



PLANNING & ENVIRONMENT DEPARTMENT

# Draft Island Plan – White Paper

## Minister's Response to consultation

27<sup>th</sup> May 2010

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Introduction & Format of Plan											
DP1014		Colin Buesnel	Dyson and Buesnel Architects		White Paper - Draft Island Plan	Neither	Endorsement of AJA response to draft Island Plan		Noted	Noted	The Minister notes the endorsement of the AJA response to the draft Plan
DP490		Mr Paul Harding	The Association of Jersey Architects		Introduction	Objecting	The AJA is particularly, extremely concerned about the growing pervasive influence of nongovernmental, nonelected, pressure groups over Planning policy and decision making in Jersey. It is becoming increasingly apparent in their influence over the Planning policy and the import given to their opinions is disproportionate to their membership. There is further concern the position they take and opinions they promulgate does not actually reflect the position and views of their own members as it is known their full membership is not always consulted on such matters. The AJA would like to point out the Planning and Building (Jersey) Law 2002 specifically lists all statutory consultee's whom the Planning Minister must consult. There is concern the views of such groups have had undue influence over writing of the 2009 Draft Plan.		Reject	The process of preparing this Island Plan is the most open, transparent and rigorous of any Island Plan that has been developed in Jersey, particularly in relation to the holding of an Examination in Public, which will subject the draft plan and its policies and proposals to independent, expert and impartial scrutiny in public. Furthermore, amendments to the law now require future substantive amendment of the draft Plan, once it enters the process of review in the States Assembly process, to continue to be subject to further public engagement and consultation. On the basis of the above, therefore, it is considered that the justification for the policies and proposals in the Plan will be openly and clearly scrutinised thus enabling the public and States members to take an informed view on the draft Plan prior to a debate on its approval and adoption, based on the wider public interest of the Island. Whilst not material to the draft Plan, individual decisions of the Minister and/or Planning Applications Panel on planning application require justification, whether for approval or rejection, and remain open to challenge through the process of first party or third party appeal processes, should it be felt that any decision is unduly based.	The Minister is not minded to accept the comments made
DP391		Mr Nicolas Jouault		Picture .1	Process	Neither	A small display and an individual at the parish hall was the bare minimum, this needs to be improved upon, perhaps ask the parish to engage teams and individuals for this and perhaps on a more		Noted	The consultation period on the draft Plan lasted for six months and officers were available to talk to individuals or groups on	Noted by the Minister

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							permanent basis.			request about any issues contained therein. The parish exhibitions were just one element of the consultation process.	
DP1015		Ray Shead	The Jersey Chamber of Commerce		Format of the Plan	Objecting	The overall document is very unwieldy and not user-friendly. It is suggested that the Planning Department should try to refine the information and make it more easily usable and in particular, the introduction of more flexibility is essential throughout the Draft Island Plan. With in the document it is stated that on occasions, "the Minister for Planning and Environment will publish Supplementary Planning Guidance" . This raises the question as to when he will he do this and perhaps it should be part of the Island Plan procurement. Timescales with regard to the publication and content of Supplementary Planning Guidance would be beneficial as it would allow the various stakeholder groups to understand what is to be reviewed.		Reject	The provision of a comprehensive and integrated planning policy framework for the Island for the next 10 years inevitably results in a relatively complex and weighty document. During the consultation process attempts were made through leaflets, exhibitions and engagement with the media and the public, to distil the key issues addressed by the draft Plan and the policies and proposals contained within it; The provision of a planning policy framework seeks to provide a constant basis against which decision-makers, applicants and the wider public can view and assess the management of land use change in the Island. Developers, and those seeking to make investment decisions, and people affected by development proposals look to the Island Plan to provide them with a degree of certainty and consistency in relation to decision-making: whilst never wholly definitive, it is important that the Island Plan provides a basis against which decisions can be made and judged. Whilst the Island Plan remains the primary material consideration when assessing development proposals, each case will be considered and judged on its own merits and it remains at the discretion of the Minister to approve a development proposal that runs contrary to the Plan, where he or she considers that there is sufficient justification to do so, and so the Island Plan and the planning system in Jersey always retains a degree of flexibility. Details relating to the development and publication of	The Minister notes the comment made and the Minister is minded to insert further details about the process for dealing with departures to the Island Plan and about the basis upon which the Minister may consider and approve development proposals that are contrary to the Island Plan. Timescales for the development of SPG is provided at Appendix A

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										supplementary planning guidance are provided at Appendix A of the draft Plan	
DP406		Mr Tony Scott Warren			Format of the Plan	Neither	L'Office du Jèrriais supports language and cultural development in Jersey and under the terms of its Partnership Agreement with the Department for Education, Sport and Culture, it is charged with working with organisations to promote Jèrriais as part of local cultural life and to encourage the use and visibility of Jèrriais in public places. The States Strategic Plan 2006-11 includes a commitment at 2.8.3 to work "to revive the language of Jèrriais." In addition, the States Cultural Strategy states that the promotion of Jèrriais is fundamental to the Island's identity. We believe that, as occurs in many other countries, there needs to be linguistic consideration during the planning process. Planning decisions affect the position and visibility of a language at community level. There would seem to be two areas where linguistic considerations need to be part of the planning process. Firstly, the European Charter for Regional or Minority Languages states in Part 3, Article 10, Section 2: In respect of the local and regional authorities on whose territory the number of residents who are users of regional or minority languages is such as to justify the measures specified below, the Parties undertake to allow and/or encourage... g. the use or adoption, if necessary in conjunction with the name in the official language(s), of traditional and correct forms of place-names in regional or minority languages. Although Jersey has not yet ratified for part 3 of the Charter, it would seem to be within States policy and the Cultural Strategy that action should be taken to ensure the survival and/or protection of traditional place-names, whether they be field-names or other names incorporating natural, historical or geographical features. For example, where a development is proposed in a field or on a green-field site, consideration should be given within the planning process to giving protection to the traditional terminology and the correct Jèrriais spelling and grammar. If it is considered inexpedient to preserve the exact form of a traditional name, then a suitable modernised version could be provided in Jèrriais to maintain the link with the area. Alongside the policy of preserving traditional names, consideration and encouragement could also be given to adding to the stock of Jèrriais names in all new developments, whether urban or rural. It may be that there is an historic connection or feature, where a Jèrriais name can be revived for a new development or the	States Strategic Plan and States Cultural Strategy	Noted	The Minister notes the comments made and will seek to ensure the retention of Jerriais for place names in the draft Plan and will consider its wider use in the planning process	The Minister notes the comments made and will seek to ensure the retention of Jerriais for place names in the draft Plan and will consider its wider use in the planning process

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							<p>special culture of Jersey can be brought forward. L'Office du Jèrriais is able and willing to assist at any time with advice in this respect, and it would be useful if the Planning and Environment Department could make the availability of this assistance known to developers. The second area is that of signage. Bilingual signage can be regarded as both a challenge and an opportunity. It may be a challenge in terms of design and/or size, but this challenge is met in many multi-lingual communities. The opportunity is that of visibility. Jèrriais has been described as Jersey's hidden treasure, and greater use of the language in signage would be a very effective way of promoting the principles of the cultural strategy and the distinctiveness of Jersey's public realm. Where signage is provided by public bodies, it would seem to be an entirely appropriate way of meeting States cultural aims. For private and commercial signage, once again it would be helpful if as part of the planning process, applicants could be reminded that bilingual signage is encouraged and that L'Office du Jèrriais is able to assist them. On the question of historic and long-standing signs, any existing Jèrriais should be preserved or replaced with modernised versions which maintain the correct grammar and spelling. In any case we would not like to see Jèrriais excluded from signage by any inadvertent Planning policy. The European Charter for Regional or Minority Languages states in Part 2 Article 7 that In determining their policy with regard to regional or minority languages, the Parties shall take into consideration the needs and wishes expressed by the groups which use such languages We hope that the needs of the Jèrriais community will encourage linguistic considerations to become a part of the planning process and be included in the final Island Plan.</p>				
DP483		Mr Charles Alluto	The National Trust for Jersey		Format of the Plan	Objecting	We think it is important to note that although the draft plan is an extremely comprehensive document it is also unwieldy in nature.	As a result the consultation process may well have benefited from the publication of a brief summary document highlighting the key policies.	Noted	A summary document was produced to assist with the public consultation events and parish exhibitions held for the Island Plan Review process. It is also relevant to note that the publicity associated with the Plan in the media sought to highlight key issues.	Noted by the Minister
DP484		Mr Charles Alluto	The National Trust for Jersey		Format of the Plan	Objecting	The Trust believes that there would have been value in highlighting the main problems and issues that have arisen in terms of the existing Island Plan and demonstrating how these have been constructively addressed in the new plan. For example has existing policy been sufficiently robust and succinct to prevent misinterpretation at officer,	Without doubt such key issues are of considerable public concern and need to be fully addressed in order to sustain confidence and trust in the Island's planning system.	Noted	Problems and issues were highlighted in the Green Paper and are summarised at the start of each chapter. The nuances of changing policy interpretation and application were also discussed in a number of the	Noted by the Minister

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							applicant or political level? If the answer is no then have measures been put in place to ensure that future policy does not suffer the same fate?			themed stakeholder workshops and also at the parish hall workshops. The previous comment of the Trust suggested that the document was unwieldy: to further highlight issues of policy interpretation in the justification for any change to policy would have made it even more so.	
DP486		Mr Paul Harding	The Association of Jersey Architects		Format of the Plan	Neither	In general the AJA congratulates the Policy & Projects division of the Planning Department for their work on preparing the 2009 Draft Plan. Overall the Plan is very well written, thorough and precise. Any subsequent criticism of specific aspects is to be taken as comment on the political and social framework that has influenced the Plan, not any reflection on Officers involved with writing the Plan.		Noted	Noted	The Ministers notes, and is appreciative, of the comments made
DP488		Mr Paul Harding	The Association of Jersey Architects		Format of the Plan	Supporting	We commend the clarity of identifying what is an Objective, an Indicator, a Proposal and a Policy. We trust this will assist with separating out overarching aims (Objective) and measures of achievement (Indicator) from the actual Policies (supplemented with SPG's / Master plans defining Proposals) that will be applied to future Planning Applications.		Noted	Noted	The Minister notes the support expressed for the format of the Plan
DP677		Mrs Sue Lissenden			Format of the Plan	Neither	Commend the easiness of the read. There are a few 'cloth-eared ' moments like assessing assets, but these are very few. Have said the document was an easy read. However the repetitions probably considered necessary as you do not expect everyone to read the whole Plan - make it tedious. Some of these could be avoided The use of acronyms, so prevalent in all fields now, made for hold-ups, as the reader sought to make sure MHW, ESA, EIA, LWM, EVA etc were understood and not confused with others. How long before the proposed Coastal National Park becomes CNP, not to be confused with some acronym referring to parking spaces for vehicles?		Noted	Noted	Noted by the Minister
Proposals Map											
DP1017		Mr Andrew Morris		Map .1	Proposals Map	Objecting	Just want to make a representation to the draft island plan for the rezoning of Oak Lane farm, St Brelade, which we recently submitted for development with the relocation of an SSI building, but was refused due to another site being more suited. We appreciate that the site is countryside zone, but this is a perfect development site and already the area is being substantially developed.	During the Planning panel meeting, Sean Power and other panel members agreed that this would be a very good site for development and didn't see any reasons another development could not be passed on this site. Adding to this, the neighbouring residences want the site to be developed to enhance the character of the area, and for these reasons we would like to request a review of the sites zoning. If you get time to visit the site, you will be able to get a better	Reject	Site does not comply with spatial strategy and does not meet with planning Minister's criteria for protecting green fields and open spaces. This includes the extension of the built-up area boundary, into the countryside, to allow for smaller-scale incremental development opportunities. The policy regime	The Minister is not minded to amend the draft Plan



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								understanding of the general planning gain the rezoning would provide.		imposed by Policy NE7 would not prevent proposals to restore and thereby enhance the character of the undeveloped area. Indeed it is important that proposals to further develop and intensify activities in this location need to be considered in relation to their potential impact upon the character of the area and thus the application of the Green Zone policy is considered to be appropriate.	
DP1038		Mr MJ Smth	J Design Limited	Map .1	Proposals Map	Objecting	On behalf of the owner of Field 836 we have been instructed to write to yourselves to request the reconsideration of this site for inclusion for rezoning for housing in the new Jersey Island Plan. The area of Field 836 under consideration for rezoning is the southern part of the field as indicated on the attached Ordnance Survey extract. This section of the field which is approximately trapezoidal in shape measures some 3172 sq.metres 10.783 acres in area. Our client would like to offer this site for rezoning specifically for the construction of homes for the over 55's. It is calculated that the site would accommodate 14 - 18 such dwellings together with appropriate amenity space, gardens and parking.	In support of this request for rezoning we would request that the following is taken into consideration :- The part of the site in question is of poor quality agricultural land which has not been cultivated for many years. The site would form a natural infill between the Talana Hotel complex and housing to the south west, and the Bagot Manor Road / Les Serres housing to the north east. The site has direct vehicular access to La Route de Longueville. The site is on the local bus network with excellent bus links to St Helier and to Gorey Village. The site is within pedestrian walking distance of local shops and other amenities. All main services are available in Longueville Road. We are aware that this site was previously considered during the Island Plan review which took place in 2007 - 2008 and that it was then decided not to proffer this site for rezoning due to an objection raised by Parish Deputies concerning the storm water catchment area, together with the apparent conflict with the existing bus lay by and landscape impact. With regard to the concerns as to the storm water catchment area, the part of the site under consideration is actually some 2.0 - 3.0m above the small stream which originates some 50.0m to the north west in field 836, and to the west of the water catchment area in field 846. There is no reason to suspect that a development in the higher part of field 836 will give rise to any adverse impact on the water catchment area or the stream, nor will it lead to any greater amount of surface water being discharged to these areas. Regarding the existing bus lay by it is feasible for this to be reconfigured to safely accommodate a vehicular access to the site and for visibility lines to be observed in both directions on La Route de Longueville. In addition the proposed development would incorporate a bus shelter for the protection of waiting passengers. Concerns as	Reject	Site does not comply with spatial strategy and does not meet with planning Minister's criteria for protecting green fields and open spaces. This includes the redefinition and extension of the built-up area boundary, into the countryside, to allow for smaller-scale incremental development opportunities. The Plan makes it clear that throughout the plan period, sufficient land is available for the provision of Category B homes within the existing built up area. There are, therefore, considered to be no grounds to identify other sources of supply to meet housing needs, including the release of additional greenfield land.	The Minister is not minded to amend the draft Plan



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								to "landscape impact" are subjective. The site is flat and is unremarkable in terms of its landscape quality, hence it is not subject to the higher levels of protection afforded by Green Zone or Zone of Outstanding Character Policies. The site is located in the Countryside Zone within which it is recognised that there is no room for restoring landscape character. It is considered that the rezoning of this site would comfortably fall within four Island Plan strategies defined in chapter 3.4 of the current Island Plan, The development of this site would also meet the six key elements of the Spatial Strategy contained in the current Island Plan in that it would: - Integrate comfortably within the existing Built Up Area Be able to make efficient use of the land Enable opportunities for using alternative means of transport other than the car Be designed to reduce environmental impacts Utilize the existing infrastructure Ensure an adequate distribution of housing development in the Parish Accordingly we request that further consideration be given to the rezoning of the southern part of this field to permit the construction of homes for the over 55's.			
DP1055	Mr George De Sousa	Mr & Mrs Carrow		Map .1	Proposals Map	Objecting	We would appreciate if the field 269 (which has a total area in excess of two verges) and possibly the adjoining field 267 would be considered for rezoning for Category A housing. Location Field 269 is currently zoned for agricultural use and located on the fringe of the built up zone in Trinity. The field is accessed via La Rue de Cambrai on the north boundary, which also serves the existing housing developments of Les Croix Close and Clos de la Ponte on the west boundary of field 269. The current usage of the field has been limited to pasture due to the installation of a public sewer by the States of Jersey without consultation running across the field with access manholes compromising the use of the field. Therefore, since the introduction of the sewer and due to the size of the field, what little interest shown by farmers has now evaporated.	Justification and Proposal As stated above the field benefits from its location due to being sited between an existing built up area and an access road, with the required level of services available to sustain a natural extension of the built up zone. Under the current draft Island Plan the rezoning has already taken into consideration part of the adjoining field located to the south-east. Our proposal would be to provide much needed category A housing with an initial feasibility study showing a provision of between 8-9 houses on field 269. These houses would have gardens and parking in excess of the minimum requirements to maintain the existing rural aspect within Trinity and with the added possibility of improving the infrastructure such as providing footpaths to Rue de Cambrai leading towards Rue du Tas de Geon. We would therefore welcome the Department's consideration of extending the rezoning to incorporate field 269 and field 267 for housing.	Reject	he proposed sites do not comply with spatial strategy and does not meet with planning Minister's criteria for protecting green fields and open spaces. This includes the extension of the built-up area boundary, into the countryside, to allow for incremental development opportunities. There are, therefore, considered to be no grounds to identify other sources of supply to meet housing needs, including the release of additional greenfield land. Policy H5 (housing in rural areas) supports the provision of new housing as part of village plan proposals put forward by the constable and this is the policy where such housing sites may be considered in the future, provided they are required to support the vitality of the village.	The Minister is not minded to amend the draft Plan
DP1082		Douglas Creedon		Map .1	Proposals Map	Objecting	Field No. 622 in St. Ouen	Thank you for meeting with us recently and as discussed and agreed, please find enclosed herewith a document prepared by residents bordering Field No. 622 in St. Ouen. This document details the objections, the reasons for the objections and presents alternative solutions	Support for zoning Field 622, St Ouen Green zone	Field 622 St Ouen is zoned as Green Zone and not proposed for Category A development in the draft Island Plan.	The Minister notes the support for zoning Field 622, St Ouen Green zone

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								<p>to the project being proposed by the Connétable of St. Ouen, which requires the rezoning of Field 622, currently designated as 'Green Zone'. The manner in which the Connétable and Parish authorities have expedited and presented the case for re-zoning, has caused us much concern. These concerns are also highlighted in the document. We would very much appreciate it if you would consider the enclosed and at a suitable time present it on our behalf to the Minister of Planning and Environment so that he is made fully aware of our objections and concerns and can raise these issues during any meetings etc., appertaining to the re-zoning of Field No. 622. We are also delivering copies of the attached document to various members of the States so that they in turn are made aware of our objections and our concerns at the way in which the Parish has progressed this matter. Should you or the Minister wish to meet or discuss any aspects of our documents, the objections or facts surrounding the preparation of the document, please do not hesitate to contact us. Once again we thank you for taking the time to meet with us and thank you in advance for your assistance in passing the enclosed document to the Minister and his committee members. Why Field 622 is not appropriate 1. Pierre Le Saux stated at the Parish Assembly that the cast boundaries of fields 622 and 623 were declared in 1973/4 to be the end of the building line of the St Ouen's village development by the first ombudsman panel ever held with reference to planning and development, States members. IDC, Parish officials and other parties formed the panel. They declared that no development would be allowed westwards beyond this line because it would be classed as an extension into the countryside and that the area was to be classed as a very sensitive area due to the close proximity and importance of the marsh. Therefore it was deemed appropriate to create a 'buffer zone'. The Marsh has not moved so the buffer must remain. 2. Rue de la Croute is a very narrow green lane and access onto the main roads at either end is extremely hazardous. The Constable referred to a traffic island as a calming measure to assist in this respect this is simply not feasible. This also means very poor access for emergency services. The impact of additional traffic on such a small narrow lane is also inappropriate. In case reference 20 07 / 03, a field was not considered appropriate for rezoning on these grounds. 3. Impact on the environment.</p>	noted.		

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								<p>Drain age is an issue as the water table is high and this will result in flooding in the surrounding area affecting the Marsh and wildlife. Further, this will prove expensive to deal with. 4. The field is higher than the road. The development would require extensive excavations, proving costly and potentially problematic for surrounding properties in close proximity. 5. The rezoning of a field of this scale, 9 verges 23 perch, is unnecessary for the likely scale of development given likely funding (as supported by Trinity development referred to above). 6. The Island Plan policy allows for the consideration of rezoning only when there are no other alternatives. This is not the case here. We have demonstrated that there are alternative sites more suitable than the Field proposed. 7. Please refer to the enclosed correspondence with Jersey Heritage' which supports and endorses the argument for the site being of historical interest'. 8. As with Field 621 in Noirmont, the Field provides a 'valuable break in the existing built-up area'. 9. The loss of agricultural land (which is leased and used all year round)" and the potential impact of traffic (as supported by the decision not to progress the rezoning of sites referenced 2007/01 - and 2007/02). Patrick Holden, director of the Soil Association has stated that governments need to consider very carefully the potential loss of agricultural land to development and that the subsequent loss of food production on a global scale is a serious threat. The Jersey Royal potato is 'owned' by Jersey and is extremely important to our island, its production must not be compromised by the loss of Green Field sites to development. Field 622 is used annually for the production of the Jersey Royal potato. The proximity of the largest worked Agricultural Unit in the Parish. 11. The Island Plan provisions of e13 &amp; 5 serve to safeguard agricultural land. This field is of a size and scale that makes it incredibly valuable and therefore worked agricultural land. This is not the case for the alternatives. We are also confident that the Department of Agriculture would have to agree with the argument for retaining this Field as green zone given its year round use and value. 12. One of only two reasons for which planning case reference P/2008/0540 was refused in August 2008 in the same location was on the grounds that it is 'an area of open and natural land within an environmentally sensitive location the creation of a new residential curtilage around the structure would result in the creeping domestication, and permanent loss, of an area of</p>			

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								<p>this open land which would be harmful to the natural character of the immediate vicinity. Par this reason, it is considered that the application fails to satisfy the requirements of Policies G2 and C5 of the Jersey Island Plan'." In further consideration of the C5 policy in the context of La Rue De La Croute, the same case cited that the 'area has a high level of protection and there is a general presumption against new development' It was acknowledged that the policy docs allow for the conversion o f existing buildings to non-intrusive residential use, mindful o f the need to keep the loss of agricultural land to an absolute minimum. These statements clearly endorse our argument. 13. What will the future hold for the western element of Field 622 and indeed the Field numbered 623 in front of it? Both very well utilised large expanses of green zone of great agricultural and environmental value and significance. Our countryside simply cannot be carved up and abused in such a reckless and cavalier manner. Having demonstrated that: - 1. There remains uncertainty in respect of the determination of funds likely to be available; 2. I f this is so; is it appropriate to seek rezoning of 5 verges 22 perch? 3. The scale of the development proposed is not relative to the funds likely to be realised and the Parish Assembly were not made aware of how the highly probable significant shortfall will be met. 4. There appears to be some co n fusion as to whether we are considering rezoning land for a development of sheltered housing for the elderly or Lifelong dwellings for the over 55's. Perhaps this needs clarification. 5. We believe that there are alternatives which may be more appropriate in terms o f scale, use and access considerations. Also that are within countryside zone rather than green zone; 6. We are of the opinion that Field 622 is not appropriate for this development or indeed rezoning at all. We consider rezoning such a large, well used agricultural field which has such historical significance and environmental sensitivity simply cannot be justified. At the November Parish Assembly, parishioners were asked to approve the undertaking of a feasibility report for the purpose of expenditure. To our knowledge, no such request has been placed before the Parishioners for development of Field 622. For all these reason s and supported by your Minister's speech at a recent Institute o f Directors meeting, your department's rejection o f other sites on common and fewer grounds, we remain hopeful that you</p>			

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								will share our concerns and conclude that Field 622 is simply not appropriate or viable for such a proposal or indeed rezoning for development of any kind.			
DP1099		Mr Mark Le Boutillier	GR Langlois	Map .1	Proposals Map	Objecting	Field 1368, St Helier (H3/2) The site is just over an acre in size and is isolated in the corner of a built up area surrounded by residential development to the north and west and roads to the south and east. The site has not been worked since Field 1370 to the north was developed for social housing some 3 years ago. As part of the development of Field 1370 there was a requirement from Planning to form a road leading to Field 1368 to serve future development. The development of this site would complete the natural extension of the 'Mon Sejour village' which was clearly intended by Planning at the time in identifying the site on the 2002 Plan. All mains services are available to serve the site. The site would yield approximately 16 family houses.	There is still a big demand for first time buyer housing and we believe that appropriate sites will still need to be found outside of the town to accommodate family homes. Sites already identified on the 2002 Island Plan for this purpose would we assume be high on any revised list of potential sites as they have already passed through a thorough planning procedure in identifying them for future development. In this regard we would request that further consideration be given to including the following 2 small sites indicated for Cat A housing on the 2002 Plan for rezoning on the new Plan.	Reject	The proposed site is undeveloped and therefore does not meet the revised spatial strategy and with the planning Minister's criteria for protecting green fields and open spaces. In addition sufficient supply of category A homes has been identified by the draft plan.	The Minister is not minded to amend the draft Plan
DP1100		Mr Mark Le Boutillier	GR Langlois	Map .1	Proposals Map	Objecting	Field 1404, Trinity (H4/19) The site is just over an acre in size and surrounded on 3 sides by a mix of commercial and residential development. There is a bus stop directly adjacent the site and the local convenience store is only a short walk away to the north. Certain food items are also available at the garage shop adjacent the site. There were previous potential access issues with this site which have now been resolved. Adequate access has been formally approved in a separate planning application to develop the bungalow 'Fairways' located between the site and the main road. The development of field 1404 would form a natural extension to 'Sion village' with additional families in the area helping to support the local shop etc. All mains services are available to serve the site. The site would yield approximately 16 family houses.	There is still a big demand for first time buyer housing and we believe that appropriate sites will still need to be found outside of the town to accommodate family homes. Sites already identified on the 2002 Island Plan for this purpose would we assume be high on any revised list of potential sites as they have already passed through a thorough planning procedure in identifying them for future development. In this regard we would request that further consideration be given to including the following 2 small sites indicated for Cat A housing on the 2002 Plan for rezoning on the new Plan.	Reject	The proposed site is undeveloped and therefore does not meet the revised spatial strategy of the 2009 plan and the Minister's criteria for protecting green fields and open spaces. A sufficient supply of category A homes has been identified by the draft plan from Brownfield sites.	The Minister is not minded to amend the draft Plan
DP1114		Richard Morin		Map .1	Proposals Map	Objecting	La Maison Des Pointes, La Mont Cambrai, St Lawrence, JE3 1JN I am grateful for the opportunity to comment on the draft Island Plan, and would be grateful if you could assist me with the following. I wrote earlier in the year to request that the anomaly with my property sitting within the green zone be addressed. The property - La Maison Des Pointes, La Mont Cambrai, St Lawrence, JE3 1JN - sits within but on the edge of the green zone, but is adjacent to a built up area to its north and east. I believe this to be an anomaly which has existed since the north part of the corner of that field was purchased and the property built. To my mind it should fit within the built up area boundary that encompasses the adjacent properties, and not the green zone. Although it is of course quite proper that the fields to the south and west are within the		Reject	Site does not comply with spatial strategy and does not meet with planning Minister's criteria for protecting green fields and open spaces. This includes the extension of the built-up area boundary, into the countryside, to allow for smaller-scale incremental development opportunities. The previous zoning anomaly has been rectified inline with the Countryside Character Appraisals evaluation of the overriding character of the area as being 'interior agricultural land' and therefore Green Zone.	The Minister is not minded to amend the draft Plan



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							green zone. To resolve this anomaly therefore, I would be grateful if, within the new Island Plan, the property could be removed from the green zone as it seems unfair that it should be treated differently to its neighbouring properties.				
DP1115		Gary Le Quesne		Map .1	Proposals Map	Objecting	<p>Query on the Proposed Island Plan - Land east of Portelet Heights Further to our meeting at your offices in November last year with Julian Skelley (co-owner of the Land) and Jason Dodd (architect) following on from the pre application letter (PAI200911245 from Lawrence Davis to Mr J Dodd) I have spent some time reviewing the planning policy and am very keen to draw your attention to the details of the site. I recently visited the consultation presentation for the proposed Island Plan at St Lawrence Parish Hall and am concerned that the whole area of Portelet Heights (where Julian lives) which is a large two storey dwelling of 6 flats +4 garage block and our land that we wish to develop (diagram I - areas marked yellow and red) is proposed to be in the new Coastal National Park zone. The coast is in fact a greater distance away from our property compared that of the Dandara Portelet development. It is also proposed our property be boarded on one side by Green zone, but we would prefer it to be included in this zone as it is a substantial cluster of buildings. I would therefore like you to take this letter as an official comment to the proposed new Island plan. With reference to our proposed plot (shown in red) there are a number of points we feel add merit to our request to use the site for residential purposes, obviously with a construction which clearly meets the planning requirements of Coastal or Green zone, in that it would "not seriously harm the amenities. character or biodiversity of the area because of its construction disturbance, siting, sea/farm . appearance, materials. noise or emissions. The proposed plot: (see attached) 1. The land is not agricultural land and has no field number. 2, Has been shown in previous Island maps over the years to have had a large unit on it and has a well and foundations evident on the property. 3. Has not reverted to a natural condition (as stated in Mr Davies letter) but has a vast amount of building materials on the area, including concrete, cement and general building rubble . This stands approximately 10ft high in places. 4. Based on point 2 and 3 could reasonably be assumed was used for residential purposes. I strongly believe that an appropriately constructed dwelling (low impact, eco friendly) would in fact seriously enhance the area of land to that of its existing state. I feel it would be</p>		Reject	<p>Portelet Heights and the associated undeveloped land and contribute towards the general character of this area which is deemed as being Cliffs and Headlands by the Countryside Character Appraisal. Any proposals to further develop activities in this location need to be considered in relation to their potential impact upon the character of the area and thus the application of the policy regime imposed by Policy NE6 is considered to be appropriate.</p>	The Minister is not minded to amend the draft Plan



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							very beneficial to meet you on the site, not only so you can give further consideration to the zoning of the Portelet Heights (where Julian lives), but also to the request of Julian and myself to use some of the land to the east of Portelet Heights to rein state a building for residential purposes (a revised planning application is currently being finalised by Jason).				
DP1116		Michael Gould		Map .1	Proposals Map	Objecting	Fields 756 & 756a, St. Saviour Following the recent piece in the Evening Post relating to the need for land for the building of houses, may I commend to you Fields 756 & 756a, St. Saviour. These are in the ownership of the company Bagatelle Farm Developments Limited, and lie to the South and East of Palace Close. Plans were submitted as long ago as 1982 which would have provided for the erection of 47 houses, and I remain completely unable to comprehend the reasons which have been advanced against such a development. The more so when I consider the many beautiful fields which have been lost to the Island in the years since.		Reject	Site does not comply with spatial strategy and does not meet with planning Minister's criteria for protecting green fields and open spaces.	The Minister is not minded to amend the draft Plan
DP1121		Mr Barry Masefield		Map .1	Proposals Map	Objecting	Request for Field 287, St. Peter to be included in built up area for over 55's development	Support stated from past and present Constables of St. Peter (see attached)	Reject	Site does not comply with spatial strategy and does not meet with planning Minister's criteria for protecting green fields and open spaces.	The Minister is not minded to amend the draft Plan
DP1122		Mr David Anderson		Map .1	Proposals Map	Objecting	Application to develop Field 189 - La Rue De L'Eglise, St Peter	I am writing further to our recent meeting at St. Peter's Parish Hall during the Island Plan Road Show. As requested by yourself, I am writing to document the conversation we had with St Peter Deputy Collin Egge that evening regarding our previous applications to build retirement homes on the above field. During our conversation Mr Egge volunteered his support of our application citing the following reasons: 1. St Peter required more retirement accommodation specifically constructed to meet the Island Plan review requirement for "Lifetime Homes". 2. The proposed development is within the boundary of an existing built-up area and doesn't "jump" the road boundary as in other applications. 3. The field is not of a high quality or of a size to be economically viable. 4. The proposed development is close to existing Parish amenities and public transport. I have also spoken with the Constable on a previous occasion, who has also indicated their support of this application. OAs per our conversation, we would like to accept your invitation to meet with the various planning concerned and parish officials to discuss the proposed development and review any issues which may arise. To assist I have attached copy of a previous application and a print out of the Island	Reject	Site does not comply with spatial strategy and does not meet with planning Minister's criteria for protecting green fields and open spaces.	The Minister is not minded to amend the draft Plan

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								Plan Map showing the location.			
DP1123	J S Carney	Mr & Mrs D Cole		Map .1	Proposals Map	Objecting	To provide an extended domestic curtilage on the east side of Craigie Hall, to incorporate the lower portion of the subject Field 151, and use the balance, to the north, as grazing for a horse.	The client maintains he has established through the Environment Division that the Field and in particular the raised area in question is of no agricultural value. Furthermore the zoning of this part of the Field under Island Plan II as C5 Green Zone was extremely harsh at the time and inappropriate considering it had been used for decades previously as a quarry and/or commercial purposes. We are mindful of the concise comments contained in John Nicholson's letter on the subject of 17th September, 2007 (copy enclosed for our information).	Reject	Site does not comply with spatial strategy and does not meet with planning Minister's criteria for protecting green fields and open spaces.	The Minister is not minded to amend the draft Plan
DP1124		R Treseder-Griffin		Map .1	Proposals Map	Objecting	Trinity Grange La Rue du Presbytere, Trinity, JE3 518 Further to my recent conversation with Kevin Pilley, Assistant Director, Planning and Building Services and the exchange of emails with him, I would comment as follows: The property in question is Trinity Grange, La Rue du Presbytere, Trinity, JE3 518. This belongs to my father, Mr. HOT Treseder-Griffin, and on 22 August 2009 there was a serious fire resulting in his injury and very extensive damage to the house. He was in intensive care and is now in a Residential Home. Trinity Grange will have to be rebuilt. As I have my father's power of attorney, I am dealing with his insurers regarding the insurance claim. The insurers will of course only pay to rebuild the property as near as possible to what was there before the fire. It makes no sense to me to just reinstate the property as it was very old, poorly designed, with only two bedrooms and one bathroom. With careful and sympathetic design the property could be brought up to a specification and standard that we all take for granted today. It could easily incorporate four bedrooms as the footprint of the property is substantial. There will obviously be a great deal of upheaval during this rebuild process . Turning now to the site plan - trinity grange.pdf that Kevin Pilley kindly sent me and the Proposals Map on your website I can see the following: This site plan shows the buildings and the garden as 569. There are roads to the West, North and East and the Southern boundary adjoins the neighbouring site marked 570 on the plan. There are trees on the Western, Northern and Southern boundaries with the Eastern boundary mainly stone wall. There has been considerable storm damage to the trees on the western boundary in the recent years. The 'Proposals Map' shows a Green area described as Field No.569 and a White area covering the existing property, which has been extended to the North East site corner. I am objecting to the Green zone area marked Field No.569 under your policy NE7		Reject	Site does not comply with spatial strategy and does not meet with planning Minister's criteria for protecting green fields and open spaces. This includes the extension of the built-up area boundary, into the countryside, to allow for smaller-scale incremental development opportunities.	The Minister is not minded to amend the draft Plan

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							and the Built-up area boundary under your policy H6 being curtailed to the North and East of Trinity Grange. This White zone boundary could be extended to incorporate Field No.569 for the following reasons: 1. The area described as Field No.569 was to my knowledge last used for agricultural purposes to grow potatoes well before my grandparents purchased this property back in the mid fifties. From the time they moved into the property and as long ago as I can remember, but certainly when I lived in the Island as a child, it was and always has been extensively laid to lawn areas with some borders and flower beds. 2. Several years ago my father was advised that this area had been rezoned as a White area and he had plans draw up for the development of a number of houses on Field No.569. However he decided not to put these plans forward to be implemented. 3. He was again approached in 2000 by J Gallichan, Connétable of Trinity, with a view to building retirement or affordable housing on Field No.569. At that time my father again decided he did not want to go down that route. 4. The area to the North and East of the property is already zoned White. Field No.568 to the West is farmland and so is Green, as is Field No.570 to the South. 5. I believe Field No.569 could serve a more constructive use by building a number of low density, high quality houses in keeping with the surrounding area and without loss of habitat/trees. This proposition would not have any adverse effect on the local community in terms of amenities or traffic flow and would conform to policy GO 1. 6. As extensive rebuild work will have to be carried out on the site to reinstate the burnt out property then it makes sense to carry out any additional work at the same time to limit upheaval and disruption. 7. This field area has changed from an Important Open Space prior to 2002, through an Important Open Space Contraction, to a Green Zone. 8. Trinity Grange is not registered as a building of local interest or indeed a site of special interest. There are past precedents to show that consideration has already been given to develop Field No.569. For the above mentioned reasons, I object to Field No.569 being considered as a Green Zone.				
DP1125		P J Thomson		Map .1	Proposals Map	Objecting	I am writing to you on behalf of the owners of Field 125 in St Clements, namely Mrs R Surcouf, Mr C Butler, Mr G Butler and myself. We would like to have our field incorporated into the Island Plan for residential housing. We would like you to note that we have the authority/from Mr M Cottillard to inform you that there is road access to our field		Reject	Site does not comply with spatial strategy and does not meet with planning Minister's criteria for protecting green fields and open spaces. This includes the extension of the built-up area boundary, into the countryside,	The Minister is not minded to amend the draft Plan

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							with sufficient splay to the coast road through the recently developed field 126. Water and drainage services have also been laid to our field boundary. I also refer you to a letter dated as far back as January 1989 (ref 1/01/17/2) when we were asked by the IDC if our field was available for residential housing development and if we had access to the main coast road. Field 125 now has housing development on both the east and south boundaries.			to allow for smaller-scale incremental development opportunities.	
DP1126	Mrs Janet Wilson	Mr Roland Osbourn e-Smith		Map .1	Proposals Map	Objecting	Field 707, La Route de Noirmont, St Brelade We were interested to note that the consultation period for the new Island Plan had been extended for a period of three months and during that time representations from the public would be entertained by the Planning Department. We were disappointed that, when the Draft Island Plan was made available, no recommendation was given to include the above field and the field adjoining it which is Field Number 706, owned by Mr Roland Osborn-Smith, as suitable for residential development. A brief visit to Field 707 and Field 706 will demonstrate it's suitability as it abuts an existing built-up area and has access to services already provided in Route de Noirmont. In fact, in the opinion of this company and Mr Osborn-Smith . Fields 706 and 707 lend themselves more easily to residential development than some of the fields identified in the Draft Island Plan produced recently. We should be most grateful if you would consider Field 707 and indeed Field 706 regarding which Mr Osborn-Smith will, I understand, write to you under separate cover. for inclusion in the Island Plan.		Reject	Site does not comply with the revised spatial strategy of the 2009 plan and does not meet with planning Minister's criteria for protecting green fields and open spaces. This includes the extension of the built-up area boundary, into the countryside, to allow for smaller-scale incremental development opportunities. The Plan identifies a sufficient supply of Category A and B homes, therefore there are considered to be no grounds to identify other sources of supply to meet housing needs, including the release of additional greenfield land.	The Minister is not minded to amend the draft Plan
DP1130		Mr Robert Le Quesne	St Clement's Growers (Jersey) Limited	Map .1	Proposals Map	Objecting	Thank you for meeting us with our architect, Lawrence Philips, on 2 November. I write to ask that the boundary between the built up zone and countryside zone currently running west to east to the north of our farm buildings at Slate House, St. Clement be moved further north to the boundary between us and out neighbour Mr Wismuller, a distance of some 20 metres. To help us develop our business we wish to apply to build an agriculture shed/store on this small area which currently is waste ground. We are establishing orchards around our property and will need facilities to aid us with fruit production and storage. We also have several excellent hay meadows and prospective customers for the hay, but need to be able to store the hay undercover during the autumn and winter. The shed would also enable us to keep our costly tractors and equipment under cover.		Reject	The policy regime imposed by NE7, Green Zone permits development on an "existing agricultural holding which is essential to the needs of agriculture and which is in accordance with Policy ERE 6 'New Agricultural Buildings, Extensions, And Horticultural Structures.'" The proposed zoning amendment to Built Up area does not comply with the spatial strategy and does not meet with planning Minister's criteria for protecting green fields and open spaces. This includes the extension of the built-up area boundary, into the countryside, to allow for smaller-scale	The Minister is not minded to amend the draft Plan

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										incremental development opportunities.	
DP1131		Mr Robert Le Quesne	St Clement's Growers (Jersey) Limited	Map .1	Proposals Map	Objecting	Fields 252 and 253 St Clement I also wish to draw your attention to another area of land in our ownership, namely fields 252 and 253. These fields have three areas of disused glasshouses on them and would be ideal for development, possibly for sheltered housing or first time buyers. The site is next to Clos de Corvez and has all the infrastructures, services and access to a new road already in place. We have sought the advice of an experienced developer and if this site could be included in the built up zone I am sure that a very worthwhile scheme could be achieved.		Reject	The site scored favourably on the suitability of sites put forward for consideration for supplying Category A homes, however other sites were judged to be more suitable. Therefore, ultimately the site failed to be selected as one of the preferred Category A development sites. Should a short fall in the supply of Category A homes arise in the future, the availability of this site to supply such homes will be taken into consideration when determining the most appropriate way in which to meet demand. The Plan makes it clear that throughout the plan period, sufficient land is available for the provision of Category B homes within the existing built up area. There are, therefore, considered to be no grounds to identify other sources of supply to meet housing needs, including extensions to the built up area.	The Minister is not minded to amend the draft Plan
DP1132		Conneta ble K Vibert	Comite des Conneta bles	Map .1	Proposals Map	Objecting	Field 622, St. Ouen I write to ask you to include in the new Island Plan, the eastern part of Field 622, St. Ouen, which the Parish wishes to develop as Senior Citizens Sheltered Housing. Please find enclosed the two copies of the location plan, two copies of the proposed drawings, the extract from Parish Assembly minutes of 17th November, 2009 as well as the minutes of the meeting held with residents on 6th February, 2009. As will be seen from the enclosed, the Parish can confirm the actual need for further sheltered accommodation and further confirm that the Parish has consulted with the neighbours and Parishioners. Should you need any further information, please contact the Parish Hall office.		Reject	Site does not comply with the spatial strategy and does not meet with planning Minister's criteria for protecting green fields and open spaces. The plan identifies a sufficient supply of category A homes. Policy H5 of the plan states that "in exceptional circumstances the Minister will support the provision of small-scale housing to support the viability and vitality of Jersey's smaller rural settlements", which includes St Ouen's Village.	The Minister is not minded to amend the draft Plan
DP1139	Mr Michael Stein	Mr G Fraser		Map .1	Proposals Map	Objecting	East Grove, La Route du Mont Mado, St John, JE3 4DS Notwithstanding that the above site is zoned as Green Zone on the Draft Proposals Map, the attached submission sets out a reasoned case why it would be reasonable and appropriate to re-zone the site as Built Up Area so that it creates an opportunity to provide new Category B Housing to help satisfy the demand for 4000 homes over the lifespan of the new Island Plan.	It is considered that the already developed site to the south of East Grove, because of its unique site characteristics and its location in this part of St John, would be ideally suited for re-zoning into the Built Up Area to allow windfall category B Housing to meet the well-documented demand for this type of housing. See attached report for full appraisal of site	Reject	The site does not comply with spatial strategy and does not meet with the planning Minister's criteria for protecting green fields and open spaces. This includes the redefinition and extension of the built-up area boundary, into the countryside, to allow for smaller-scale incremental development opportunities. The	The Minister is not minded to amend the draft Plan



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										Plan makes it clear that throughout the plan period, sufficient land is available for the provision of Category B homes within the existing built up area. There are, therefore, considered to be no grounds to identify other sources of supply to meet housing needs, including the release of additional greenfield land.	
DP1141	Mr Michael Stein	Mr G Woods		Map .1	Proposals Map	Objecting	Booster Station, Le Chemin des Pietons, St Brelade Notwithstanding that the above site is zoned as Green Zone on the Draft Proposals Map, the attached submission sets out a reasoned case why it would be reasonable and appropriate to re-zone the site as Built Up Area so that it creates an opportunity to provide new Category B Housing to help satisfy the demand for 4000 homes over the lifespan of the new Island Plan.	It is considered that the Booster Station site (and cluster of surrounding existing development), because of its unique site characteristics and its location on the edge of the Built Up Area forming part of the St Aubin's Village, would be ideally suited for re-zoning into the Built Up Area to allow windfall category B Housing to meet the well-documented demand for this type of housing. See attached report for full appraisal of site	Reject	The Countryside Character Appraisal's evaluation is that the overriding local character of the area forms an 'Enclosed Valley' and not a Built Up area. This designation remains consistent with the 2002 Island Plan Island plan designation of the land as Green Zone. Designating this built up area would contradict the established policy. The Spatial Strategy states that there is a strong desire to protect the Island's countryside, prevent the further loss of greenfield land to development, and the redefinition and extension of the built-up area boundary. Any development proposals put forward within in this location need to be considered in relation to their potential impact upon the character of the area. The application of the policy regime imposed by Policy NE7 is considered to be appropriate given the Countryside Character Appraisal evaluation of local character. The Plan makes it clear that throughout the plan period, sufficient land is available for the provision of Category B homes within the existing built up area. There are, therefore, considered to be no grounds to identify other sources of supply to meet housing needs, including the release of additional greenfield land by expanding the built up area boundary.	The Minister is not minded to amend the draft Plan
DP1142	Mr Michael	Mrs B Corniliss		Map .1	Proposals Map	Objecting	Field 797, La Rue des Sauvalleries, St Peter Notwithstanding that the above site is zoned as	It is considered that Field 797, because of its unique site characteristics and its location in this	Reject	Site does not comply with spatial strategy and does not meet with	The Minister is not minded to



Ref	Agent	Name	Org/bus.	No.	Title	Response	Suggested changes to the document:	Why you consider this to be necessary:	General Response	Detailed Officer Response	Minister's Recommendation
	Stein	en					Green Zone on the Draft Proposals Map, the attached submission sets out a reasoned case why it would be reasonable and appropriate to re-zone the site as Built Up Area so that it creates an opportunity to provide new Category A or B Housing to help satisfy the demand for 4000 homes over the lifespan of the new Island Plan.	part of St Peter, would be ideally suited for re-zoning either into the Built Up Area to allow windfall category B Housing or, alternatively, re-zoned as a site for Category A Housing to meet the well-documented demand for this type of housing. See attached report for full appraisal of site		planning Minister's criteria for protecting green fields and open spaces. This includes the extension of the built-up area boundary, into the countryside, to allow for smaller-scale incremental development opportunities. The Plan makes it clear that throughout the plan period, sufficient land is available for the provision of Category B homes within the existing built up area. In addition sufficient supply of category A homes has been identified by the draft plan. There are, therefore, considered to be no grounds to identify other sources of supply to meet housing needs, including the release of additional greenfield land.	amend the draft Plan
DP1143	Mr Michael Stein	Mr & Mrs P Richards on		Map .1	Proposals Map	Objecting	Sunnymeade, Le Mont Cochon, St Helier, JE2 3JB Notwithstanding that the above site is zoned as Green Zone on the Draft Proposals Map, the attached submission sets out a reasoned case why it would be reasonable and appropriate to re-zone the site as Built Up Area so that it creates an opportunity to provide new Category B Housing to help satisfy the demand for 4000 homes over the lifespan of the new Island Plan.	It is considered that the scrubland to the south of Sunnymeade, because of its unique site characteristics and its location on the edge of the built Up Area forming part of the Town of St Helier, would be ideally suited for re-zoning into the Built Up Area to allow windfall category B Housing to meet the well documented demand for this type of housing. See attached report for full appraisal of site	Reject	Not only are the buildings within the proposed extension to the Built up area boundary dispersed and significantly detached from the established built up area, the Countryside Character Appraisal's evaluation is that the overriding local character of the area is 'Interior Agricultural Land'. Therefore, it is clear that this is not a built up area. Development of the site does not comply with spatial strategy and does not meet with planning Minister's criteria for protecting green fields and open spaces. This includes the redefinition and extension of the built-up area boundary, into the countryside, to allow for smaller-scale incremental development opportunities. The Plan makes it clear that throughout the plan period, sufficient land is available for the provision of Category B homes within the existing built up area. There are, therefore, considered to be no grounds to identify other sources of supply to meet housing needs, including the release of additional greenfield land.	The Minister is not minded to amend the draft Plan

Ref	Agent	Name	Org/bus.	No.	Title	Response	Suggested changes to the document:	Why you consider this to be necessary:	General Response	Detailed Officer Response	Minister's Recommendation
DP1145	Mr Michael Stein	Mr Charles Prouten		Map .1	Proposals Map	Objecting	Field 783 to be re-zoned to built up area	I write in response to the Draft Island Plan White Paper in connection with the above site which I consider justifies being re-zoned into Built Up Area (as a natural extension to the existing Small Built Up Area) or re-zoned as a Category A Housing site (as has happened to the adjoining Field 785, St Ouen, which abuts to the south west), as presently the site is zoned as Green Zone (and as Green Zone in the White Paper) which precludes any new residential development taking place. This represents a missed opportunity to provide additional residential development on edge of Built Up Area sites such as this which may, because of site characteristics, be capable of accommodating more development without being harmful to the character of the area. Alternatively, the new Green Zone Policy needs to be re-drafted to enable such sites to be developed, as an exception to the presumption against development, to enable the provision of much needed Category B Housing. For instance, the site has existing development in the Built Up Area to the south and west, and Field 785 to the south west is proposed as a Category A Housing site in the White Paper. Therefore, the notion of developing this site would seem to be reasonable as it would not have an adverse impact on the landscape character of the proposed Green Zone and result in a sensible "rounding-off" of the existing Built Up Area .	Reject	Site does not comply with spatial strategy and does not meet with planning Minister's criteria for protecting green fields and open spaces. This includes the extension of the built-up area boundary, into the countryside, to allow for smaller-scale incremental development opportunities. The Plan makes it clear that throughout the plan period, sufficient land is available for the provision of Category B homes within the existing built up area. In addition sufficient supply of category A homes has been identified by the draft plan. There are, therefore, considered to be no grounds to identify other sources of supply to meet housing needs, including the release of additional greenfield land.	The Minister is not minded to amend the draft Plan
DP1146	Mr Michael Stein	Mr Michael Stein	MSPlanning Ltd	Map .1	Proposals Map	Objecting	Glasshouses at, Field 79, Broadfields, St Lawrence Re-zone redundant glasshouses into Built Up Area As is evident from the Location Map in Appendix 1, the redundant timber frame glasshouses on Field 79, St Lawrence are located within a small settlement formed around La Rue de la Frontiere, La Chanolles de Six Rue, Broadfields and La Rue des Varvots, and which reasonably could be regarded and, therefore, re-zoned as a Small Built Up Area, not unlike those at Le Mont Felard , St Lawrence and La Verte Rue/Clos des Ormes, St Lawrence. However, unlike these two settlements, this settlement was not zoned in the Island as a Small Built Up Area, notwithstanding its closer proximity to the Key Rural Settlements at Carrefour Selous, St Lawrence Church (see areas highlighted in blue on Map in Appendix 2) or St Mary's Village, which were also all re-zoned into the Built Up Area as part of the Island Plan (2002). Given that the site has not been in horticultural production for over 20 years, as a result of unfavourable market conditions and the escalating cost of fuel, the glasshouses and ancillary buildings are consequently in a state of	It is considered that this redundant glasshouse site, as a brownfield site, together with the adjoining settlement could, because of its site characteristics and its proximity to Carrefour Selous and St Mary's Village, with all their services and amenities, would make it an ideal candidate for re-zoning into the Built Up Area to allow a windfall category B House to meet the well-documented demand for this type of housing. Alternatively, Policy C20 should be revisited to allow exceptions to be made for the redevelopment of redundant glasshouses on the edge of or within existing settlements, hamlets, or groupings of buildings for residential purposes. The Planning Minister is, therefore, respectfully requested to identify this site as worthy of being recommended to the States as a site that can reasonably accommodate new residential development of Category B Housing without causing any harm to the character of the area.	Reject	The Countryside Character Appraisal's evaluation is that the overriding local character of the area is 'Interior Agricultural Land'. It is clear that in no way does this site represent a Built Up area. The few residential properties that are within the proposed 'built up area' are significantly dispersed and detached from one another. This designation remains consistent with the 2002 Island Plan Island plan designation of the land as Countryside Zone. The Spatial Strategy states that there is a strong desire to protect the Island's countryside and prevent the further loss of greenfield land to development. This includes the redefinition, and extension of the built-up area boundary into the countryside to provide smaller-scale incremental development	The Minister is not minded to amend the draft Plan

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							<p>disrepair and therefore redundant, albeit the site itself is well kept and in a tidy state. Because there is no incentive or assistance to help in the removal of redundant glasshouses, not unlike all other similar sites around the island, there is no reason to remove these and restore the land as this would be at considerable cost to the owner with no prospect of any financial return, Therefore, since becoming redundant, they are gradually worsening in their state of repair and in terms of their appearance. This being the case, I anticipate that the Land Controls &amp; Agricultural Development Section would not resist its loss to development. This is confirmed in the Statutory Services Officer's e-mail dated 24th June 2008 (See Appendix 3). Moreover, derelict or redundant glasshouse sites are now increasingly regarded as brownfield sites, by virtue of already having been developed on, and which, over time, have become increasingly unsightly. They are, therefore, reasonably regarded as better locations to develop than open green field sites. Therefore, even if this derelict glasshouse site, or the wider settlement within which it sits, is not re-zoned into Built Up Area, at least Policy C20 of the Island Plan (2002) should be revisited and revised to enable the development of such glasshouses sites where they form part of a settlement, a hamlet or a grouping of buildings, and new residential development permitted as an exception to the countryside policies relating to the Countryside Zone (Policy C6) and Green Zones (Policy C5). Therefore, at a time of significant pressure in the island for the release of additional land for Category A and B housing, and sheltered housing for the elderly (as evidenced by the recent Jersey's Housing Assessment 2008-2012 publication) it is considered timely to offer this land for re-zoning for these purposes, which under the current policy regime would be resisted, primarily because of the strong presumption set against all new residential development for sites located in the Countryside Zone, notwithstanding the clear planning merits for development. Given the particular characteristics of the site and its surrounding context, it is considered that a lower density of Category B Housing would be most appropriate. Alternatively, Policy C20 should be revisited to allow exceptions to be made for the redevelopment of redundant glasshouses on the edge of or within existing settlements, hamlets, or groupings of buildings for residential purposes, as is the case here. As is evident from the Location Map in Appendix 1, the redundant timber frame glasshouses on Field 79, St Lawrence are located</p>			<p>opportunities. In addition the plan makes it clear that there is sufficient land is available for the provision of Category B homes within the existing built up area, therefore there is no need to release additional greenfield land for development. Any development proposals put forward within in this location need to be considered in relation to their potential impact upon the character of the area. The application of the policy regime imposed by Policy NE7 is considered to be appropriate given the Countryside Character Appraisal evaluation of local character. Whilst there is a presumption against the redevelopment of redundant and derelict glasshouses for other uses unrelated to agriculture; in exceptional circumstances, Policy ERE7, Derelict and Redundant Glasshouses, permits minimal non-agricultural development in order to ensure demonstrable environmental improvement of the site by the removal of the glasshouses and any contaminated material, the reduction in the area of buildings, and the repair to the landscape.</p>	

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							<p>within a small settlement formed around La Rue de la Frontiere, La Chanolles de Six Rue, Broadfields and La Rue des Varvots, and which reasonably could be regarded and, therefore, re-zoned as a Small Built Up Area, not unlike those at Le Mont Felard , St Lawrence and La Verte Rue/Clos des Ormes, St Lawrence. However, unlike these two settlements, this settlement was not zoned in the Island as a Small Built Up Area, notwithstanding its closer proximity to the Key Rural Settlements at Carrefour Selous, St Lawrence Church (see areas highlighted in blue on Map in Appendix 2) or St Mary's Village, which were also all re-zoned into the Built Up Area as part of the Island Plan (2002). Given that the site has not been in horticultural production for over 20 years, as a result of unfavourable market conditions and the escalating cost of fuel, the glasshouses and ancillary buildings are consequently in a state of disrepair and therefore redundant, albeit the site itself is well kept and in a tidy state. Because there is no incentive or assistance to help in the removal of redundant glasshouses, not unlike all other similar sites around the island, there is no reason to remove these and restore the land as this would be at considerable cost to the owner with no prospect of any financial return, Therefore, since becoming redundant, they are gradually worsening in their state of repair and in terms of their appearance. This being the case, I anticipate that the Land Controls &amp; Agricultural Development Section would not resist its loss to development. This is confirmed in the Statutory Services Officer's e-mail dated 24th June 2008 (See Appendix 3). Moreover, derelict or redundant glasshouse sites are now increasingly regarded as brownfield sites, by virtue of already having been developed on, and which, over time, have become increasingly unsightly. They are, therefore, reasonably regarded as better locations to develop than open green field sites. Therefore, even if this derelict glasshouse site, or the wider settlement within which it sits, is not re-zoned into Built Up Area, at least Policy C20 of the Island Plan (2002) should be revisited and revised to enable the development of such glasshouses sites where they form part of a settlement, a hamlet or a grouping of buildings, and new residential development permitted as an exception to the countryside policies relating to the Countryside Zone (Policy C6) and Green Zones (Policy C5). Therefore, at a time of significant pressure in the island for the release of additional land for Category A and B housing, and sheltered housing for the elderly (as evidenced by</p>				

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							the recent Jersey's Housing Assessment 2008-2012 publication) it is considered timely to offer this land for re-zoning for these purposes, which under the current policy regime would be resisted, primarily because of the strong presumption set against all new residential development for sites located in the Countryside Zone, notwithstanding the clear planning merits for development. Given the particular characteristics of the site and its surrounding context, it is considered that a lower density of Category B Housing would be most appropriate. Alternatively, Policy C20 should be revisited to allow exceptions to be made for the redevelopment of redundant glasshouses on the edge of or within existing settlements, hamlets, or groupings of buildings for residential purposes, as is the case here.				
DP1147	Mr Michael Stein	Mr Michael Stein	MSPlanning Ltd	Map .1	Proposals Map	Objecting	Oak Lane Farm, La Route du Petit Port, St Brelade, JE3 8LN Re-Zone Land into Built Up Area As is evident from the Location Map in Appendix 1, the land at Oak Lane Farm (the site) sits within a small cluster of existing development which abuts the western extent of Built Up Area that forms the Urban Settlement Les Quennevais/Red Houses (See map in Appendix 2). Basically, the site has existing development along its northern, eastern, western and, to a lesser extent, along its southern boundaries, and is therefore essentially surrounded by development on all four sides (See Aerial Photo and photos in Appendix 3). Because it is contiguous with the Built Up Area it therefore presents itself as a suitable site for residential development. Therefore, at a time of significant pressure in the island for the release of additional land for Category A and B housing, and sheltered housing for the elderly, it is considered timely to offer this land for re-zoning for these purposes, which under the current policy regime would be resisted primarily because of the strong presumption set against development. Significantly, the owner is only interested in developing the site with a single dwelling but, which, having regard to the immediate character of the area would be in keeping with the character of the area, yet still represent an efficient use of land.	It is considered that the land to east of Oak Lane Farm, because of its site characteristics and its location in this part of St Brelade, forming part of the Urban Settlement of Les Quennevais/Red Houses with all its services and facilities, would make it an ideal candidate for re-zoning into the Built Up Area to allow a windfall category B House to meet the well-documented demand for this type of housing. The Planning Minister is, therefore, respectfully requested to identify this site as worthy of being recommended to the States as a site to be re-zoned into Built Up Area.	Reject	Site does not comply with spatial strategy and does not meet with planning Minister's criteria for protecting green fields and open spaces. This includes the extension of the built-up area boundary, into the countryside, to allow for smaller-scale incremental development opportunities. The Plan makes it clear that throughout the plan period, sufficient land is available for the provision of Category B homes within the existing built up area. There are, therefore, considered to be no grounds to identify other sources of supply to meet housing needs, including the release of additional greenfield land. The policy regime imposed by Policy NE7 would not prevent proposals to restore and thereby enhance the character of the undeveloped area. Indeed it is important that proposals to further develop and intensify activities in this location need to be considered in relation to their potential impact upon the character of the area and thus the application of the Green Zone policy is considered to be appropriate.	The Minister is not minded to amend the draft Plan
DP1148	Mr Michael Stein	Mr Michael Stein	MSPlanning Ltd	Map .1	Proposals Map	Objecting	The Grange, La Rue a Don, Grouville, JE3 9DA Re-Zone Land for Residential Purposes As is evident from the Location Map in Appendix 1, The Grange	It is considered that the land which forms The Grange (and Field 730A), together with the adjoining settlement could, because of its site	Reject	The site is significantly detached from the established built up area boundary, furthermore the	The Minister is not minded to amend the draft



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							(and Field 730A) sits on the edge of an existing settlement. However, strangely, unlike three settlements nearby (St Saviour's Hospital, Teighmore Park and Grouville Church) , it was not zoned in the Island Plan (2002) as Built Up Area, notwithstanding its closer proximity to the town of St Helier (See Appendix 2). With much of the site covered by derelict glasshouses and hard standing and with planning permission for alternative commercial use, the site is effectively a brownfield site (See Aerial Photo in Appendix 3) and which, if re-zoned into Built Up Area would usefully yield a significant number of Category B Houses and thereby reduce the need to re-zone greenfield sites. Therefore, at a time of significant pressure in the island for the release of additional non greenfield sites for Category A and B housing, and sheltered housing for the elderly, it is considered timely to offer this land for re-zoning for these purposes which, otherwise, under the current policy regime would be resisted, primarily because of the strong presumption set against development for sites located in the Countryside Zone	characteristics and its proximity to Longeuville, Bagot, Georgetown and the town of St Helier beyond, with all their services and amenities, would make it an ideal candidate for re-zoning into the Built Up Area to allow a windfall category B House to meet the well-documented demand for this type of housing. The Planning Minister is, therefore, respectfully requested to identify this site as worthy of being recommended to the States as a site to be re-zoned into Built Up Area.		Countryside Character Appraisal's evaluation is that the overriding local character of the area is 'Interior Agricultural Land'. Development of the site does not comply with spatial strategy and does not meet with planning Minister's criteria for protecting green fields and open spaces. This includes the redefinition and extension of the built-up area boundary, into the countryside, to allow for smaller-scale incremental development opportunities. The Plan makes it clear that throughout the plan period, sufficient land is available for the provision of Category B homes within the existing built up area. There are, therefore, considered to be no grounds to identify other sources of supply to meet housing needs, including the release of additional greenfield land.	Plan
DP1149	Mr Michael Stein	Mr D Gormley		Map .1	Proposals Map	Objecting	Field 1550, Westmount Road, St Helier Re-Zone Land for Residential Purposes As is evident from the Location Map in Appendix 1, the site subject to this proposal forms part of the western extent of the town of St. Helier, abuts a residential property within the Built-Up Area to the east, and west, and is less than 100m from sizable public and utility facilities including Overdale Hospital and Mulcaster House (Jersey Water), The newly completed Le Clos Vaze (Field 218) Category A Housing site lies to the north. Along the site's northern boundary is the remainder of Field 1550 (not part of this proposal) and Field 1551, safeguarded for Category A Housing lies to the south (See Aerial Photograph in Appendix 2). Given the built-up character of the area, the Folly Field site presents itself as a suitable site for residential development, albeit limited in terms of yield to probably only ten to twelve dwellings. Therefore, at a time of significant pressure in the Island for the release of additional land for Category A and B housing , and sheltered housing for the elderly, it is considered timely to offer this land for re-zoning for the purpose of Category B housing which, because of its present designation as Important Open Space, would be resisted because of the presumption against the loss of these open areas of land.	It is considered that this part of Field 1550 and the extensive garden area of Folley Field, because of its site characteristics and its location in this part of St Helier close to extensive services, would make it an ideal candidate for re-zoning into the Built-Up Area to allow windfall Category B Housing. The Planning Minister is, therefore , respectfully requested to identify this site as worthy of being recommended to the States as a site to be re-zoned into Built-Up Area.	Reject	The site is in a prominent position on the escarpment of St. Helier and any development would cause visual harm to the character and amenities of the area and to the skyline. In addition, the development of this site would not meet with planning Minister's criteria for protecting green fields and open spaces. The Plan makes it clear that throughout the plan period, sufficient land is available for the provision of Category B homes within the existing built up area. There are, therefore, considered to be no grounds to identify other sources of supply to meet housing needs, including the release of additional greenfield land.	The Minister is not minded to amend the draft Plan
DP1150	Mr	Mr S		Map .1	Proposals	Objecting	Fields 741 & 742, New York Lane, St Saviour, JE2	I write in response to the Draft Island Plan White	Reject	Site does not comply with spatial	The Minister is



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	Michael Stein	Buckley			Map		7SU Re-Zone Land for Residential Purposes	Paper in connection with the above site which I consider justifies being re-zoned into Built Up Area (as a natural extension to the existing Main Urban Settlement) or re-zoned as a Category A Housing site (as has happened to Longueville Nurseries which abuts to the east), as presently the site is zoned as Countryside Zone (or as Green Zone in the White Paper) which precludes any new residential development taking place. This represents a missed opportunity to provide additional residential development on infill sites such as this which may, because of site characteristics, be capable of accommodating more development without being harmful to the character of the area. Indeed, in recent discussions with the Housing Minister (23 rd November 2009) he agreed that it would make sense to re-zone the site for Category A Housing. Alternatively, the new Green Zone Policy needs to be re-drafted to enable such sites to be developed, as an exception to the presumption against development, to enable the provision of much needed Category B Housing. For instance, the site has existing development in the Built Up Area to the south and west, and Longueville Nurseries, to the east, is proposed as a Category A Housing site in the White Paper, therefore causing this land to be sandwiched between. Therefore, the notion of developing this site would seem to be reasonable as it would not have an adverse impact on the landscape character of the proposed Green Zone.		strategy and does not meet with planning Minister's criteria for protecting green fields and open spaces. This includes the extension of the built-up area boundary, into the countryside, to allow for smaller-scale incremental development opportunities. The Plan makes it clear that throughout the plan period, sufficient land is available for the provision of Category B homes within the existing built up area. In addition sufficient supply of category A homes has been identified by the draft plan. There are, therefore, considered to be no grounds to identify other sources of supply to meet housing needs, including the release of additional greenfield land.	not minded to amend the draft Plan
DP1151	Mr Michael Stein	Mr D Hocquard		Map .1	Proposals Map	Objecting	Le Pommeraie, Fields 341 & 342, Deloraine Road, St. Saviour Rezoning of land into built up area.	I write in response to the Draft Island Plan White Paper in connection with the above site which (together with adjoining existing development) I consider justifies being re-zoned into Built Up Area (as a natural extension to the proposed Main Urban Settlement), as presently the site is zoned as Countryside Zone (or as Green Zone in the White Paper) which precludes any new residential development taking place. This represents a missed opportunity to provide additional residential development on infill sites such as this which may, because of site characteristics, be capable of accommodating more development without being harmful to the character of the area. Alternatively, the new Green Zone Policy needs to be re-drafted to enable such sites to be developed, as an exception to the presumption against development, to enable the provision of much needed Category B Housing. For instance, the site at La Pommeraie has existing development in the Built Up Area on three sides and is located within an existing enclave of development.	Reject	Site does not comply with spatial strategy and does not meet with planning Minister's criteria for protecting green fields and open spaces. This includes the extension of the built-up area boundary, into the countryside, to allow for smaller-scale incremental development opportunities. The Plan makes it clear that throughout the plan period, sufficient land is available for the provision of Category B homes within the existing built up area. There are, therefore, considered to be no grounds to identify other sources of supply to meet housing needs, including the release of additional greenfield land.	The Minister is not minded to amend the draft Plan

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								Therefore, the notion of developing this site would seem to be reasonable as it would not have an adverse impact on the landscape character of the proposed Green Zone. As indicated in proposed policy SP1, it would also contribute to the supply of 4000 homes that are required over the Plan Period and which for various reasons detailed below, will not be able to be accommodated within the town of St Heller as predicted in the White Paper.			
DP1152	Mr Michael Stein	Mr D Langlois		Map .1	Proposals Map	Objecting	La Maisonette, La Rue de Haut, St Lawrence JE3 1JZ Re-Zone Land into Built Up Area	I write in response to the Draft Island Plan White Paper in connection with the above site which (together with adjoining existing development) I consider justifies being re-zoned into Built Up Area (as a natural extension to the proposed Secondary Urban Settlement), as presently the site is zoned as Green Zone (and as Green Zone in the White Paper) which precludes any new residential development taking place. This represents a missed opportunity to provide additional residential development on infill sites such as this which may, because of site characteristics, be capable of accommodating more development without being harmful to the character of the area. Alternatively, the new Green Zone Policy needs to be re-drafted to enable such infill sites to be developed as an exception to the presumption against development, to enable the provision of much needed Category B Housing and which, as stated above, can be delivered without harm to the character of the area. For instance, the site at La Maisonette has existing development in the Built Up Area abutting on three sides and is located within an existing enclave of development. Therefore, the notion of developing this site would seem to be reasonable as it would not have an adverse impact on the landscape character of the proposed Green Zone. As indicated in proposed policy SP1, it would also contribute to the supply of 4000 homes that are required over the Plan Period and which for various reasons detailed below, will not be able to be accommodated within the town of St Helier as predicted in the White Paper.	Reject	Site does not comply with spatial strategy and does not meet with planning Minister's criteria for protecting green fields and open spaces. This includes the extension of the built-up area boundary, into the countryside, to allow for smaller-scale incremental development opportunities.	The Minister is not minded to amend the draft Plan
DP1153		Mr Michael Stein	MSPlanning Ltd	Map .1	Proposals Map	Objecting	Ocean View, Petit Port Close, St Brelade Re-zone land into Built Up Area	I write in response to the Draft Island Plan White Paper in connection with the above site which (together with adjoining existing development) I consider justifies being re-zoned into Built Up Area (as a natural extension to the existing Urban Settlement), as presently the site is zoned as Countryside Zone (or as Green Zone in the White Paper) which precludes any new residential development taking place. This represents a	Reject	Site does not comply with spatial strategy and does not meet with planning Minister's criteria for protecting green fields and open spaces. This includes the extension of the built-up area boundary, into the countryside, to allow for smaller-scale incremental development	The Minister is not minded to amend the draft Plan

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								missed opportunity to provide additional residential development on infill sites such as this which may, because of site characteristics, be capable of accommodating more development without being harmful to the character of the area. Alternatively, the new Green Zone Policy needs to be re-drafted to enable such sites to be developed, as an exception to the presumption against development, to enable the provision of much needed Category B Housing . For instance, the site at Ocean View has existing development on three sides and is located within an existing enclave of development. Therefore, the notion of developing this site would seem to be reasonable as it would not have an adverse impact on the landscape character of the proposed Green Zone. As indicated in proposed policy SP1 , it would also contribute to the supply of 4000 homes that are required over the Plan Period and which for various reasons detailed below, will not be able to be accommodated within the town of St Helier as predicted in the White Paper.		opportunities.	
DP1154		Mr Michael Stein	MSPlanning Ltd	Map .1	Proposals Map	Objecting	Glasshouses at, La Guilleaumerie, La Rue de la Guilleaumerie, St. Saviour Re-Zone Land into Built Up Area As is evident from the Location Map in Appendix 1, the redundant and derelict glasshouses at la Guilleaumerie, St Saviour are located within a small settlement formed around La Rue de la Guilleaumerie, La Rue du Pont and La Rue du Vieux Menage and which reasonably could be regarded and, therefore, re-zoned as a Small Built Up Area, not unlike those nearby at St Saviour's Hospital, St Saviour, and Teighmore Park, Grouville. However, unlike these two settlements, this settlement was not zoned in the Island Plan (2002) as a Small Built Up Area, notwithstanding its close proximity to the Key Rural Settlements of Maufant and St Martin's Village and to the Small Rural Settlement of Victoria Village, which were, therefore, also all rezoned into Built Up Area as part of the Island Plan (2002) (Appendix 2). Given that derelict glasshouses to the south of the site have not been in horticultural production for many years, and the intact glasshouses are outmoded in terms of their construction and their useful life has come to an end because of unfavourable market conditions and the escalating cost of fuel, it is clear that these glasshouses are no longer commercially viable and are, therefore, redundant. Because there is no incentive or assistance to help in their removal, there is no reason to remove them and restore the land back to its former state, especially given the considerable cost that would be incurred to the	It is considered that this redundant glasshouse site, as a brownfield site, together with the adjoining settlement could, because of its site characteristics and its proximity to the Key Rural Settlements of Maufant and St Martin's Village and the Small Rural Settlement of Victoria Village, with all their services and amenities, would make it an ideal candidate for re-zoning into the Built Up Area to allow a windfall category B House to meet the well-documented demand for this type of housing. Alternatively, Policy C20 should be revisited to allow exceptions to be made for the redevelopment of redundant glasshouses on the edge of or within existing settlements, hamlets, or groupings of buildings for residential purposes, as is the case here. The Planning Minister is, therefore, respectfully requested to identify this site as worthy of being recommended to the States as a site that can reasonably accommodate new residential development of Category B Housing without causing any harm to the character of the area.	Reject	The proposed sites do not comply with spatial strategy. The Countryside Character Appraisal's evaluation is that the overriding local character of the area is 'Interior Agricultural Land'. The few residential properties are both, significantly detached from the built up area and dispersed. It is clear that in no way does this site represent a Built Up area. This designation remains consistent with the 2002 Island Plan Island plan designation of the land as Countryside Zone. The Spatial Strategy states that there is a strong desire to protect the Island's countryside and prevent the further loss of greenfield land to development. This includes the redefinition, and extension of the built-up area boundary into the countryside to provide smaller-scale incremental development opportunities. In addition the plan makes it clear that there is sufficient land is available for the provision of Category B homes within the existing built up area, therefore there is no need to release additional greenfield land	The Minister is not minded to amend the draft Plan

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							owner with no prospect of any financial return. This being the case, the Land Controls & Agricultural Development Section would not resist its loss to development. This is confirmed in the Statutory Services Officer's email dated 24th June 2008 (See Appendix3). Moreover, derelict or redundant glasshouse sites are now increasingly regarded as brownfield sites, by virtue of already having been developed on and which, over time, have become increasingly unsightly. They are, therefore, reasonably regarded as better locations to develop than open green field sites. Therefore, even if this derelict/redundant glasshouse site, or the wider settlement within which it sits, is not re-zoned into Built Up Area, at least Policy C20 of the Island Plan (2002) should be revisited and revised to enable the development of such redundant glasshouses sites where they form part of a settlement, a hamlet or a grouping of buildings, and provision be made to allow them as an exception to the countryside policies relating to the Countryside Zone (policy C6) and Green Zones (Policy C5). Therefore, at a time of significant pressure in the island for the release of additional land for Category A and B housing , and sheltered housing for the elderly (as evidenced by the recent Jersey's Housing Assessment 2008-2012 publication) it is considered timely to offer this land for re-zoning for these purposes, which under the current policy regime would be resisted , primarily because of the strong presumption set against all new residential development for sites located in the Countryside Zone, notwithstanding the clear planning merits for development. Given the particular characteristics of the site and its surrounding context, it is considered that a lower density of Category B Housing would be most appropriate. Alternatively, Policy C20 should be revisited to allow exceptions to be made for the redevelopment of redundant glasshouses on the edge of or within existing settlements, hamlets, or groupings of buildings for residential purposes, as is the case here.			for development. Any development proposals put forward within in this location need to be considered in relation to their potential impact upon the character of the area. The application of the policy regime imposed by Policy NE7 is considered to be appropriate given the Countryside Character Appraisal evaluation of local character. Whilst there is a presumption against the redevelopment of redundant and derelict glasshouses for other uses unrelated to agriculture; in exceptional circumstances, Policy ERE7, Derelict and Redundant Glasshouses, permits minimal non-agricultural development in order to ensure demonstrable environmental improvement of the site by the removal of the glasshouses and any contaminated material, the reduction in the area of buildings, and the repair to the landscape.	
DP1155		Mr Michael Stein	MSPlanning Ltd	Map .1	Proposals Map	Objecting	Panorama, Land to the south of, Les Fonds du Longueville, Grouville Re-Zone Land To Built Up Area As is evident from the Location Map in Appendix 1, the land to the south of Panorama sits at the centre of an existing settlement. However, strangely, unlike the two settlements nearby (Grouville Arsenal and Le Clos du Roncier), or similar settlements such as Teighmore Park , this settlement was not zoned in the Island Plan (2002) as a Small Built-Up Area, notwithstanding its closer proximity to the Urban Settlements of the Town of	It is considered that the land south of Panorama, together with the adjoining settlement could, because of its site characteristics and its Urban Settlements of the Town of St. Helier, St. Clement Coast and Longueville, with all their services and amenities, would make it an ideal candidate for re-zoning into the Built-Up Area to allow a windfall category B House to meet the well-documented demand for this type of housing. The Planning Minister is, therefore, respectfully requested to identify this site as worthy of being recommended	Reject	Site does not comply with spatial strategy and does not meet with planning Minister's criteria for protecting green fields and open spaces. This includes the redefinition and extension of the built-up area boundary, into the countryside, to allow for smaller-scale incremental development opportunities. The Plan makes sufficient provision for the supply	The Minister is not minded to amend the draft Plan

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							St. Helier and St. Clement Coast (See Map in Appendix2). Given that the site is surrounded by houses, has planning permission for a domestic use (car parking Reference P/2008/21 30) and does not display the characteristics of the Green Zone, it is essentially a brownfield site (See Aerial Photograph in Appendix 3). Within this context, it is unreasonable therefore that the current H3 designation of the site means that it is not presently favoured for development. Therefore, at a time of significant pressure in the Island for the release of additional land for Category A and B housing, and sheltered housing for the elderly (as evidenced by the Jersey's Housing Assessment 2008-2012 publication) it is considered timely to offer this land for re-zoning for these purposes, which under the current policy regime would be resisted , primarily because of the presumption set against all new residential development for sites located in the Green Zone, Countryside Zone, and the constraints of PolicyH3, notwithstanding the clear planning merits for development.	to the States as a site to be re-zoned into Built-Up Area.		of Category B homes and therefore, there are considered to be no grounds to identify other sources of supply to meet housing needs, including the release of additional undeveloped greenfield sites	
DP1156	Mr Michael Stein	Mr & Mrs Hordiern e		Map .1	Proposals Map	Objecting	Land at Brook Farm, Mont Nicolle, St Brelade, JE3 8DN Re-Zone Land to Built Up Area	I write in response to the Draft Island Plan White Paper in connection with the above site which (together with adjoining existing development) I consider justifies being re-zoned into Built Up Area (as a natural extension to the existing Built Up Area) , as presently the site is zoned as Countryside Zone (or as Green Zone in the White Paper) which precludes any new residential development taking place. This represents a missed opportunity to provide additional residential development on infill sites such as this which may, because of site characteristics, be capable of accommodating more development without being harmful to the character of the area. Alternatively, the new Green Zone Policy needs to be re-drafted to enable such sites to be developed, as an exception to the presumption against development, to enable the provision of much needed Category B Housing. For instance, the site at Brook Farm has existing development in the Built Up Area abutting on three sides. Therefore, the notion of developing this site would seem to be reasonable as it would not have an adverse impact on the landscape character of the proposed Green Zone. As indicated in proposed policy SP1, it would also contribute to the supply of 4000 homes that are required over the Plan Period and which for various reasons detailed below, will not be able to be accommodated within the town of St Helier as predicted in the White Paper.	Minded to reject	Site does not comply with spatial strategy and does not meet with planning Minister's criteria for protecting green fields and open spaces. This includes the extension of the built-up area boundary, into the countryside, to allow for smaller-scale incremental development opportunities.	The Minister is not minded to amend the draft Plan



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DP1157	Mr Michael Stein	Mr & Mrs Ashplant		Map .1	Proposals Map	Objecting	<p>Les Sapins, La Rue de la Guilleaumerie, St. Saviour As is evident from the Location Map in Appendix 1, the redundant and derelict glasshouses at Les Sapins, St Saviour are located within a small settlement formed around La Rue de la Guilleaumerie, La Rue du Pont and La Rue du Vieux Menage, St Saviour and which reasonably could be regarded and, therefore, re-zoned as a Small Built Up Area, not unlike those nearby at St Saviour's Hospital, St Saviour, and Teighmore Park, Grouville. However, unlike these two settlements, this settlement was not zoned in the Island Plan (2002) as a Small Built Up Area, notwithstanding its closer proximity to the Key Rural Settlements of Maufant and St Martin's Village and to the Small Rural Settlement of Victoria Village, which were, therefore , also all re-zoned into Built Up Area as part of the Island Plan (2002) (Appendix 2). Given that the glasshouses have not been in horticultural production for at least two years, and are now out moded in terms of their construction and therefore past their useful life and, finally, because of unfavourable market conditions and the escalating cost of fuel, it is clear that these glasshouses are no longer commercially viable and which are, therefore, effectively redundant. Because there is no incentive or assistance to help in their removal, there is no reason to remove them and restore the land back to its former state, especially given the considerable cost that would be incurred to the owner with no prospect of any financial return. This being the case, the Land Controls &amp; Agricultural Development Section would not resist its loss to development. This is confirmed in the Statutory Services Officer's e-mail dated 19th November 2008 (See Appendix 3). Moreover, derelict or redundant glasshouse sites are now increasingly regarded as brownfield sites, by virtue of already having been developed on and which, over time, have become increasingly unsightly. They are, therefore, reasonably regarded as better locations to develop than open green field sites, especially where they are surrounded by existing residential development. Therefore, even if this redundant glasshouse site, or the wider settlement within which it sits, is not re-zoned into Built Up Area, at least Policy C20 of the Island Plan (2002) should be revisited and revised to enable the development of such redundant glasshouses sites where they form part of a settlement, a hamlet or a grouping of buildings, and provision be made to allow them as an exception to the countryside policies relating to the Countryside Zone (Policy C6) and Green Zones (Policy C5). Therefore, at a time of</p>	<p>It is considered that this redundant glasshouse site, as a brownfield site, together with the adjoining settlement could, because of its site characteristics and its proximity to the Key Rural Settlements of Maufant and St Martin's Village and the Small Rural Settlement of Victoria Village, with all their services and amenities, would make it an ideal candidate for re-zoning into the Built Up Area to allow a windfall category B House to meet the well-documented demand for this type of housing. Alternatively, Policy C20 should be revisited to allow exceptions to be made for the redevelopment of redundant glasshouses on the edge of or within existing settlements, hamlets, or groupings of buildings for residential purposes, as is the case here. The Planning Minister is, therefore, respectfully requested to identify this site as worthy of being recommended to the States as a site that can reasonably accommodate new residential development of Category B Housing without causing any harm to the character of the area.</p>	Reject	<p>Does not meet the spatial Strategy The Countryside Character Appraisal's evaluation is that the overriding local character of the area is 'Interior Agricultural Land'. The few residential properties are both, significantly detached from the built up area and dispersed. It is clear that in no way does this site represent a Built Up area. This designation remains consistent with the 2002 Island Plan Island plan designation of the land as Countryside Zone. The Spatial Strategy states that there is a strong desire to protect the Island's countryside and prevent the further loss of greenfield land to development. This includes the redefinition, and extension of the built-up area boundary into the countryside to provide smaller-scale incremental development opportunities. In addition the plan makes it clear that there is sufficient land is available for the provision of Category B homes within the existing built up area, therefore there is no need to release additional greenfield land for development. Any development proposals put forward within in this location need to be considered in relation to their potential impact upon the character of the area. The application of the policy regime imposed by Policy NE7 is considered to be appropriate given the Countryside Character Appraisal evaluation of local character. Whilst there is a presumption against the redevelopment of redundant and derelict glasshouses for other uses unrelated to agriculture; in exceptional circumstances, Policy ERE7, Derelict and Redundant Glasshouses, permits minimal non-agricultural development in order to ensure demonstrable environmental improvement of</p>	The Minister is not minded to amend the draft Plan



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							significant pressure in the island for the release of additional land for Category A and B housing, and sheltered housing for the elderly (as evidenced by the recent Jersey's Housing Assessment 2008-2012 publication) it is considered timely to offer this land for re-zoning for these purposes, which under the current policy regime would be resisted, primarily because of the strong presumption set against all new residential development for sites located in the Countryside Zone, notwithstanding the clear planning merits for development. Given the particular characteristics of the site and its surrounding context, it is considered that a lower density of Category B Housing would be most appropriate. Alternatively, Policy C20 should be revisited to allow exceptions to be made for the redevelopment of redundant glasshouses on the edge of or within existing settlements, hamlets, or groupings of buildings for residential purposes, as is the case here.			the site by the removal of the glasshouses and any contaminated material, the reduction in the area of buildings, and the repair to the landscape.	
DP1158	Mr Michael Stein	P Mossop		Map .1	Proposals Map	Objecting	Field 190A, La Grande Route de St. Clement, St. Clement Re-Zone Land into Built Up Area	I write in response to the Draft Island Plan White Paper in connection with the above site which I consider justifies being re-zoned into Built Up Area, as presently the site is zoned as Green Zone (and as Green Zone in the White Paper)which precludes any new residential development taking place. This represents a missed opportunity to provide additional residential development on infill sites such as this which may, because of site characteristics, be capable of accommodating more development without being harmful to the character of the area. Alternatively, the new Green Zone Policy needs to be re-drafted to enable such sites to be developed, as an exception to the presumption against development, to enable the provision of much needed Category B Housing. For instance, the site to abuts the existing Built Up Area and has existing development to the west and south. Therefore, the notion of developing this site would seem to be reasonable as it would not have an adverse impact on the landscape character of the proposed Green Zone. As indicated in proposed policy SP1 , it would also contribute to the supply of 4000 homes that are required over the Plan Period and which for various reasons detailed below, will not be able to be accommodated within the town of St Heller as predicted in the White Paper.	Reject	Site does not comply with spatial strategy and does not meet with planning Minister's criteria for protecting green fields and open spaces. This includes the extension of the built-up area boundary, into the countryside, to allow for smaller-scale incremental development opportunities. The Plan makes it clear that throughout the plan period, sufficient land is available for the provision of Category B homes within the existing built up area. There are, therefore, considered to be no grounds to identify other sources of supply to meet housing needs, including the release of additional greenfield land.	The Minister is not minded to amend the draft Plan
DP1159	Mr Michael Stein	Mr R Amy		Map .1	Proposals Map	Objecting	Field 1017A, la Rue du Moulin du Ponterrin, Trinity Re-Zone Land for Residential Purposes	I write in response to the Draft Island Plan White Paper in connection with the above site which I consider justifies being re-zoned into Built Up Area, as presently the site is zoned as Countryside Zone (or as Green Zone in the White Paper)which	Reject	The site does not comply with spatial strategy and does not meet with planning Minister's criteria for protecting green fields and open spaces. This includes	The Minister is not minded to amend the draft Plan

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								precludes any new residential development taking place. This represents a missed opportunity to provide additional residential development on infill sites such as this which may, because of site characteristics, be capable of accommodating more development without being harmful to the character of the area. Alternatively, the new Green Zone Policy needs to be re-drafted to enable such sites to be developed, as an exception to the presumption against development, to enable the provision of much needed Category B Housing . For instance, the site has existing development on three sides abutting the existing Built Up Area. Therefore, the notion of developing this site would seem to be reasonable as it would not have an adverse impact on the landscape character of the proposed Green Zone. As indicated in proposed policy SP1, it would also contribute to the supply of 4000 homes that are required over the Plan Period and which for various reasons detailed below, will not be able to be accommodated within the town of St Helier as predicted in the White Paper.		the redefinition and extension of the built-up area boundary, into the countryside, to allow for smaller-scale incremental development opportunities. The Plan makes it clear that throughout the plan period, sufficient land is available for the provision of Category B homes within the existing built up area. There are, therefore, considered to be no grounds to identify other sources of supply to meet housing needs, including the release of additional greenfield land.	
DP1160	Mr Michael Stein	Mr Le Quesne M		Map .1	Proposals Map	Objecting	Field 1017A, la Rue du Moulin du Ponterrin, Trinity Re-Zone Land for Residential Purposes	I write in response to the Draft Island Plan White Paper in connection with the above site which I consider justifies being re-zoned into Built Up Area, as presently the site is zoned as Countryside Zone (or as Green Zone in the White Paper)which precludes any new residential development taking place. This represents a missed opportunity to provide additional residential development on infill sites such as this which may, because of site characteristics, be capable of accommodating more development without being harmful to the character of the area. Alternatively, the new Green Zone Policy needs to be re-drafted to enable such sites to be developed, as an exception to the presumption against development, to enable the provision of much needed Category B Housing . For instance, the site has existing development on three sides abutting the existing Built Up Area. Therefore, the notion of developing this site would seem to be reasonable as it would not have an adverse impact on the landscape character of the proposed Green Zone. As indicated in proposed policy SP1, it would also contribute to the supply of 4000 homes that are required over the Plan Period and which for various reasons detailed below, will not be able to be accommodated within the town of St Helier as predicted in the White Paper.	Reject	The site does not comply with spatial strategy and does not meet with planning Minister's criteria for protecting green fields and open spaces. This includes the redefinition and extension of the built-up area boundary, into the countryside, to allow for smaller-scale incremental development opportunities. The Plan makes it clear that throughout the plan period, sufficient land is available for the provision of Category B homes within the existing built up area. There are, therefore, considered to be no grounds to identify other sources of supply to meet housing needs, including the release of additional greenfield land.	The Minister is not minded to amend the draft Plan
DP1168		Kevin Pilley		Map .1	Proposals Map	Neither	Key on Town Proposals Map needs amendment: should change 'Potential Pedestrian Priority Street	To correct an error	Amend error		Minister minded to amend error

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							(Proposal 17)' to 'Pedestrian Priority (Proposal 18)'				
DP1171		Mr and Mrs Lees-Baker		Map .1	Proposals Map	Objecting	Field 622, Rue de la Croute, St Ouen, should not be rezoned for sheltered housing. (Objecting)	With regard to field 622 we have set out our particular concerns in a letter already submitted to your department. Generally, sheltered housing should be considered on an Island wide basis taking into account the needs of the elderly in all Parishes as a demonstration of joined up Government thinking.	Support for zoning Field 622, St Ouen Green zone noted.	Field 622 St Ouen is zoned as Green Zone and not proposed for Category A development in the draft Island Plan.	The Minister notes the support for zoning Field 622, St Ouen Green zone
DP1183		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
DP1184		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
DP141	Mr James Naish	Jim Naish	Biarritz Hotel	Map .1	Proposals Map	Objecting	Our Client, the owner of Seafield House, Milbrook, would like the land to the east of Seafield House rezoned out of 'Protected Open Space' as it is his garden and is entirely separate to the gardens of Seafield House itself (A listed building).	The Eastern part of the Seafield House garden should not be zoned as 'Protected Open Space' because: 1. It is not part of the Listed building 2. It cannot be seen from the public roads at either end of the land. 3. It is not a rational or logical area of zoning and appears to have been done by guessing from the ordnance survey or aerial map rather than see what is sensible in reality. 4. It has been subject to several planning permission enquiries over the recent years and is deemed to form an integral part of the commercial viability of the estate. 5. Peter Thorne and Peter Le Gresley both felt that the land did not deserve the zoning in the current island Plan of 'Important Open Space' and would even merit some limited development. 6. The field number allocated (F 882) has been wrongly applied. Prior to the previous Island Plan it was wrongly designated as it has never been agricultural land since the building was built (prior to any planning laws!). The land was taken out of the incorrect agricultural designation and now seems to have slipped back into it.	Reject	The extent of land to the east of Seafield House that is objected to is not made explicit in the representation. It is considered, however, that the area of open space associated with Seafield forms a contiguous area of mature trees and parkland that is characteristic of other parkland and the settings of large houses in the locality (Coronation Park and Millbrook Manor) and as such contributes towards the visual amenity and character of the area. These aspects, are thus considered to be relevant material considerations that ought to be taken into account in any consideration of a development proposal at Seafield and that, in this context, Policy SCO4 remains pertinent.	The Minister is not minded to amend the draft Plan
DP146		Mrs J		Map .1	Proposals	Objecting	Field 739 St Peter I am writing to you as the owner		Reject	Field 739 St Peter does not	The Minister is

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		Egre			Map		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 affords. 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. Specifically objecting to development of Samares Nursery site and proposes instead the development of field 739 St. Peter for first time buyer or sheltered housing.			comply with spatial strategy and does not meet with planning Minister's criteria for protecting green fields and open spaces. This includes the redefinition and extension of the built-up area boundary, into the countryside, to allow for smaller-scale incremental development opportunities.	not minded to amend the draft Plan
DP237		Elizabeth O'Connor		Map .1	Proposals Map	Supporting	I am writing in support of the proposed Built Up Area Boundary for St Mary. I live to the north of field 502 which is adjacent to a property called Plaisance, La Rue de la Vallee. Having lived in St Mary for over 36 years, I have an intimate knowledge of Plaisance and believe that this farm, which has recently been designated as a Site of Special Interest, together with the fields which surround it, contribute to the historic interest of St Mary as one of the least developed of the rural Parishes. I note that the fields surrounding Plaisance have been excluded from the built up area on the proposals map, and I am writing to support this. I would also like to suggest that they be zoned as Protected Open Space.		Noted	Support for the designation of the extents of the Built Up Area of St Mary's village is noted. Field 502 falls outside of the Built Up Area and is designated Green Zone, the field is afforded a high level of protection, accordingly therefore the additional zoning of Protected Open space is unnecessary.	Support is noted by the Minister
DP243		Mr Mike Alexandre		Map .1	Proposals Map	Objecting	The draft Island plan indicates that field 641 is to remain in the urban area. This we believe is wrong and we have petitioned against it. Please return field 641, St Peters, to the green zone.	Field 641 is not suitable for building on and should never have been moved from agricultural land to urban in the 2002 Island plan. the land to the west of La Rue de La Pointe must remain for farming.	Minded to not amend the established boundary of the Built Up	The site in question was zoned by the 2002 Island Plan as part of the St Peters village Built Up area. The thick hedgerow along the western boundary of the site provides a clear distinction between the Countryside Character Appraisals' evaluation of the land as forming part of the	The Minister is not minded to amend the draft Plan

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									Area.	villages the built up area, not as part of interior agricultural land of the Western Plateau beyond this boundary. The site fits the spatial strategy preference for locating development within the built up area and not in open countryside and therefore minded to not amend the boundary of the established built up area.	
DP244		Mr John Jackson	Environment Division	Map .1	Proposals Map	Objecting	Field 641 St peter should be zoned in the green zone (NE7) and removed from the Built up area	To preserve the current boundary of St Peter along la Rue de la Pointe Preserve the landscape and amenity of the area Maintain an important environmental habitat Preserve high quality agricultural land for crop production Uphold and conserve planning sub committee decisions "that field 641 should never be built on" Field 641 was erroneously zoned in the built up area in 2002 against previous planning decisions.	Minded to not amend the established boundary of the Built Up Area.	The site in question was zoned by the 2002 Island Plan as part of the St Peters village Built Up area. The thick hedgerow along the western boundary of the site provides a clear distinction between the Countryside Character Appraisals' evaluation of the land as forming part of the villages the built up area, not as part of interior agricultural land of the Western Plateau beyond this boundary. The site fits the spatial strategy preference for locating development within the built up area and not in open countryside and therefore minded to not amend the boundary of the established built up area.	The Minister is not minded to amend the draft Plan
DP245		Gill Morgan		Map .1	Proposals Map	Objecting	The re zoning of field 641 (from SP1) back into the green zone (NE7), where it was erroneously put in the 2002 Plan. It is clearly in the countryside zone and it has been commented on by the last 2 planning committees, which have met to refuse planning permission on it that it should never be built on. field	As previously explained above. + important wildlife area: toads, pipistrel bats, etc. To preserve the character and amenity of the area and retain the natural boundary of the countryside along La Rue de la Pointe.	Minded to not amend the established boundary of the Built Up Area.	The site in question was zoned by the 2002 Island Plan as part of the St Peters village Built Up area. The thick hedgerow along the western boundary of the site provides a clear distinction between the Countryside Character Appraisals' evaluation of the land as forming part of the villages the built up area, not as part of interior agricultural land of the Western Plateau beyond this boundary. The site fits the spatial strategy preference for locating development within the built up area and not in open countryside and therefore minded to not amend the boundary of the established built up area.	The Minister is not minded to amend the draft Plan
DP246		Mr Alan Le		Map .1	Proposals Map	Objecting	That field 641 be returned to the green zone (NE7) - It seems this may have been a mistake or perhaps it	Rue de la Pointe is the obvious boundary between the built up area and the countryside.	Minded to not	The site in question was zoned by the 2002 Island Plan as part of	The Minister is not minded to



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		Rossigno I					was a "slip of the pen" to include it previously.	Developments have so far been rejected by the planning panel unanimously, and it has been stated that building should never be allowed in that field. Any development here would seriously spoil the neighbourhood. Until recently this field was used for growing - the soil is good quality and it is a viable size for agricultural use.	amend the established boundary of the Built Up Area	the St Peters village Built Up area. The thick hedgerow along the western boundary of the site provides a clear distinction between the Countryside Character Appraisals' evaluation of the land as forming part of the villages the built up area, not as part of interior agricultural land of the Western Plateau beyond this boundary. The site fits the spatial strategy preference for locating development within the built up area and not in open countryside and therefore minded to not amend the boundary of the established built up area.	amend the draft Plan
DP248		Elaine Le Rossigno I		Map .1	Proposals Map	Objecting	Field 641 should be removed from the built up area and re-zoned in green zone (NE7)	The development proposed has already been turned down unanimously by 2 different planning panels. It has never been suggested that this would be a good field to develop. If any building were to be undertaken, it would be to the detriment of amenities presently enjoyed by the community and a great detriment to the flora and fauna who have populated the area. The field has always been agricultural land and should continue to be so, and it would appear that a mistake in zoning was made in the first place.	Minded to not amend the established boundary of the Built Up Area.	The site in question was zoned by the 2002 Island Plan as part of the St Peters village Built Up area. The thick hedgerow along the western boundary of the site provides a clear distinction between the Countryside Character Appraisals' evaluations of the land as forming part of the villages the built up area, not as part of interior agricultural land of the Western Plateau beyond this boundary. The site fits the spatial strategy preference for locating development within the built up area and not in open countryside and therefore minded to not amend the boundary of the established built up area.	The Minister is not minded to amend the draft Plan
DP249		Bill Jones		Map .1	Proposals Map	Objecting	Adamant that field 641 is placed back in the GREEN ZONE (NE7 ). Fact that it was placed out of the green zone in the 2002 Island plan is a DISGRACE	Why? Rue de la Pointe forms a natural boundary in St. Peter's Parish! St. Peter's has more than it's share of housing provision - new buyers, retired and family homes. There should be NO MORE development to the west of La rue de la Pointe. PLEASE !!	Minded to not amend the established boundary of the Built Up Area.	The site in question was zoned by the 2002 Island Plan as part of the St Peters village Built Up area. The thick hedgerow along the western boundary of the site provides a clear distinction between the Countryside Character Appraisals' evaluations of the land as forming part of the villages the built up area, not as part of interior agricultural land of the Western Plateau beyond this boundary. The site fits the spatial strategy preference for locating development within the	The Minister is not minded to amend the draft Plan

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										built up area and not in open countryside and therefore minded to not amend the boundary of the established built up area.	
DP250		Sue Jones		Map .1	Proposals Map	Objecting	Suggestion : Field 641 is placed back in the green zone (NE7) where it deserves to be. Island plan of 2002 placed it inappropriately out of its natural status i.e. Green Zone.	St. Peters Parish has made generous provision for additional housing FACT! Rue de la Pointe forms a natural boundary between green zones and built up area FACT! Observation of the draft Plan 2009 indicates that field 641 stands out in isolation FACT! Development on west side would be detrimental to wildlife, e.g. toads, bats & flora. FACT! Rue de la Pointe is a busy, bust road. Safety of all road users, especially pedestrians is of prime concern! Development on field 641 would imply exits and entrance at narrowest part of la Rue de la Pointe FACT!	Minded to not amend the established boundary of the Built Up Area.	Field 641 is not zoned for the purposes of providing additional Category A homes. The site in question was zoned by the 2002 Island Plan as part of the St Peters village Built Up area. The thick hedgerow along the western boundary of the site provides a clear distinction between the Countryside Character Appraisals' evaluations of the land as forming part of the villages the built up area, not as part of interior agricultural land of the Western Plateau beyond this boundary. The site fits the spatial strategy preference for locating development within the built up area and not in open countryside and therefore minded to not amend the boundary of the established built up area. The natural environment section of the plan sets a series of policies that protect the Islands biodiversity. Should Field 641 or any other site west of La Rue de la Pointe contain wildlife and habitats for species scheduled in accordance with The Conservation of Wildlife (Jersey) Law 2000, the policy regime imposed by Policy NE2 is considered to be appropriate to protect such species. The width of la Rue de la Pointe at the entrance to Field 641 is approximately 6 metres. The narrowest part of La Rue de la Pointe measures a width of approximately 3.5 metres.	The Minister is not minded to amend the draft Plan
DP251		Jayne Jackson		Map .1	Proposals Map	Objecting	I would like to suggest that field 641 (La Rue de la Pointe, St. Peter) is rezoned from Building zone to Green Zone	Because of the environmental importance that field 641 has within the community of St. Peter and given the fact that on 3 occasions the planning committee has rejected any applications to build on their plot of land, in addition that this committee has commented that "...this land should never be built on" It is therefore vital to	Minded to not amend the established boundary	Field 641 is not zoned for the purposes of providing additional Category A homes. The site in question was zoned by the 2002 Island Plan as part of the St Peters village Built Up area. The thick hedgerow along the	The Minister is not minded to amend the draft Plan

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								protect these types of field so that the land is preserved for future generations and that the environment is maintained enhancing the nature and boundary of the Parish.	of the Built Up Area.	western boundary of the site provides a clear distinction between the Countryside Character Appraisals' evaluations of the land as forming part of the villages the built up area, not as part of interior agricultural land of the Western Plateau beyond this boundary. The site fits the spatial strategy preference for locating development within the built up area and not in open countryside and therefore minded to not amend the boundary of the established built up area.	
DP252		Mr Michael Holley		Map .1	Proposals Map	Objecting	Re-zone field 641 into Green Zone.	I believe any building on field 641 would be a precursor to further ribbon development along west side of La Rue de la Pointe, which already forms the natural boundary between the existing built up area of St. Peters' village and the countryside. Field 641 has been used as an allotment to grow vegetables, and is good potential site for small scale market gardening or allotments.	Minded to reject amendment to built up area boundary, support for use of site as allotments noted.	1. The site in question was zoned by the 2002 Island Plan as part of the St Peters village Built Up area. The thick hedgerow along the western boundary of the site provides a clear distinction between the Countryside Character Appraisals' evaluation of the land as forming part of the villages the built up area, not as part of interior agricultural land of the Western Plateau beyond this boundary. The site fits the spatial strategy preference for locating development within the built up area and not in open countryside and therefore minded to not amend the boundary of the established built up area. 2. Proposals Policy SCO6 permits the development of allotments that are within the built up area and not on land safeguarded for agriculture.	The Minister is not minded to amend the draft Plan
DP264		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
DP32		Bill Sarre	CBRE	Map .1	Proposals Map	Neither	I have reviewed the Draft Island Plan in relation to a family holding at Bel Royal and enclose a plan outlining this holding. My suggestion is to amend the Built Up Zone, as presently drawn, as this fails to take into account buildings adjoining the Built Up Zone, but does include a grassed area to the north.	I also enclose copy plans of the existing buildings and greenhouses and in light of their existence and their proximity to the new housing estate, it would seem sensible for the boundary to be slightly amended to include these buildings. see attached letter	1. Reject extending the boundary of the built up area to include	Site does not comply with spatial strategy and does not meet with planning Minister's criteria for protecting green fields and open spaces. This includes the redefinition and extension of the built-up area boundary, into the countryside, to allow for smaller-	1. The Minister is minded to reject extending the boundary of the built up area to include 'The Gables'. 2. The Minister is

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									'The Gables' 2. amend the draft Plan to address minor anomalies and inconsistencies, as follows: (a) the lawned play area sites and the southernmost car park (intended in large part to serve the wider community / public amenity area) should be excluded from the built-up area and included in the Green Zone and the Protected Open Space designation; (the other 2 car parking areas and community building site should	scale incremental development opportunities. The land immediately to the east of the housing at La Providence, has been granted planning permission for the road entrance to the development, a community building, car parking and play areas. The play areas have subsequently been laid to grass and the community building will shortly be under construction. In the current IP this land did not form part of the zoned housing site (H2(1). In fact, it was in the 'Countryside Zone' (C6) and was also designated as 'Important Open Space' (BE8). There is another anomaly to the west of the housing site. Some landscaped peripheral amenity areas and a large part of the landscaped berm has been included in the built-up area. The developer was unable to acquire Field 862 to include within the required public amenity area, because of the unwillingness of the owner to sell. Nevertheless, the field is an important part of the natural wetland and warrants the same degree of protection as the surrounding fields. The assertion is made that there remains a significant degree of scepticism concerning the La Providence development: in response, it is relevant to note that the application process was subject to an unprecedented amount of public consultation; the developers had to address numerous and demanding planning requirements arising from the identified issues; and the decision to grant planning consent was the subject of a Committee of Inquiry, which considered all outstanding points of concern. The purpose of the Island Plan consultation process has been to be open and transparent and provide people	mindened to amend the draft Plan to address minor anomalies and inconsistencies, as follows: (a) the lawned play area sites and the southernmost car park (intended in large part to serve the wider community / public amenity area) should be excluded from the built-up area and included in the Green Zone and the Protected Open Space designation; (the other 2 car parking areas and community building site should remain in the built-up area); (b) the track and the landscaped areas to the west of the community building site should be excluded from the built-up area and included in the Green Zone; (c) to the west of the housing site part of the landscaped peripheral amenity areas and a large part of the landscaped berm has been included in the built-up area. This area should be excluded from the built-up area and included in the Green Zone and

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									remain in the built-up area); (b) the track and the landscaped areas to the west of the community building site should be excluded from the built-up area and included in the Green Zone; (c) to the west of the housing site part of the landscaped peripheral amenity areas and a large part of the landscaped berm has been included in the built-up area. This area should be excluded from the built-up area and included in the Green	with an opportunity to comment: the Minister will consider and respond to any such points raised with a view to amending the draft Plan, where necessary.	the Protected Open Space designation. (d) Field 862 should be designated as Protected Open Space as well as Green Zone.



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									Zone and the Protected Open Space designation. (d) Field 862 should be designated as Protected Open Space as well as Green Zone.		
DP349	Mr James Naish	Mr Lambert Caree		Map .1	Proposals Map	Objecting	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
DP351		Mr David Bisson		Map .1	Proposals Map	Objecting	I question why the Inland Coastal Park does not extend to the SE corner of the Island?		Reject	The importance of the inter-tidal area of the Island's South East coast is well established. The area between Gorey Pier and seaward edge of the tanker berth was designated by the States in 2000 as a Ramsar, a wetland of international importance. The Ramsar designation places clear obligations on the States to conserve the area and ensure wise use. The intention of the Coastal National Park policy is to afford the highest level of planning protection to the Islands most sensitive and valued natural landscapes and areas above the mean high water mark. The Countryside Character Appraisal provides an assessment of Jersey's environment and identifies clear character areas. The Appraisal evaluates these areas in order to determine	The Minister is not minded to amend the draft Plan

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										environmental importance and identify levels of protection. The Appraisal does not identify the St Clement-St Saviour Coastal Plain, as one of the Islands most sensitive environments. According the designating this area Coastal National Park, would be inappropriate given the character and sensitivity of the environment.	
DP356		Mr John Scally	Beaulieu Convent School	Map .1	Proposals Map	Objecting	On behalf of the Trustees of Beaulieu Convent School I wish to raise objection to the inclusion of land at Beaulieu Convent School as protected open space. There are two reasons for this objection: 1. It is the Schools intention over the coming years to develop this area for use as a Sports Hall. This is an urgent necessity for the School's curriculum as the existing facilities are completely inadequate. Fund raising for this important project is underway. 2. In the unlikely event that the School should close it may be necessary to consider an alternative use for this site, such as residential use. The retention of this area as a protected open area would severely impact upon the value of the land. John Scally Chair of Trustees Beaulieu Convent School	1. The land will be required for the construction of a Sports Hall 2. In the unlikely event that the School should cease to operate an alternative use such as residential use will be sought and this protection could therefore severely diminish the value of the land.	Reject points 1 and 2	No plan of the site is provided but it has been assumed that this would affect existing open space/ playing pitches around the existing school. Proposed development of a sports hall: any proposal to replace outdoor sports facilities with indoor sports facilities could be considered and assessed in relation to SCO4 (1) and (4) where its impact could be considered in terms of the overall benefit to the school in terms of the quality and access to sports facilities. Redevelopment of the school site, including open space: the potential closure of the school and redevelopment of the whole site is a matter that can be considered under Policy SCO1, which does not preclude redevelopment, but only in demonstrably exceptional circumstances. Dependent on the type of open space, Policy SCO4 need not preclude the redevelopment of open space on the site (i.e. if it can be demonstrated that there are school sports facilities that are no longer required as a result of the loss of the school, then SCO4(1) would not preclude development for other uses). The impact of planning policy on the value of the land is not a material consideration	The Minister is not minded to amend the draft Plan as the matters raised are dealt with by the draft Plan.
DP361		Mr David Killip		Map .1	Proposals Map	Objecting	Further to our comments on 23/11/09 we would like to add that we believe that Field 236 should be retained in the proposed Island Plan as a site to be safeguarded for Category A Housing.	Field 236 is just 0.7 of an acre excluding the banks & hedgerows so is ideally suited for such a development for the following reasons: All mains services are available. It is less than a 5 minute walk down a country lane from the heart of St	Reject	The proposed sites do not comply with spatial strategy and does not meet with planning Minister's criteria for protecting green fields and open spaces.	The Minister is not minded to amend the draft Plan

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								John village and all amenities. It is within a built up area and the St John Village settlement zone. Situated off a quiet lane, La Rue du Cimetiere where safe vehicle access & egress could be provided with good lines of vision. The field is too small to be of any value for agricultural use and has not been used as such for at least 33 years. Public transport is close at hand. The field is already bordered with established trees which would help screen it from general view and is situated where there would be limited impact on the area. It was identified as a suitable site for Category A Housing in the 2002 Island Plan. We understand there are no other sites to be safeguarded for Category A Housing in St John and currently there are no homes under construction, pending or reserved specifically for first time buyers in the Parish. It is not directly overlooked by neighbouring properties so should not raise objections.		This includes the extension of the built-up area boundary, into the countryside, to allow for incremental development opportunities. There are, therefore, considered to be no grounds to identify other sources of supply to meet housing needs, including the release of additional greenfield land. Policy H5 (housing in rural areas) supports the provision of new housing as part of village plan proposals put forward by the constable and this is the policy where such housing sites may be considered in the future, provided they are required to support the vitality of the village.	
DP368		Mr Howard Snowden	Jersey Water	Map .1	Proposals Map	Objecting	Coastal National Park Ideally, we would request that the boundary of the Park be changed to exclude the Val de la Mare Reservoir.	Coastal National Park We note that the proposal for a Coastal National Park includes the area where Val de la Mare Reservoir is located. This reservoir is the second largest surface water storage reservoir on the Island and is essential for the maintenance of adequate water supply for the Island. In October 2009, Jersey Water completed its Water Resource Management Plan (WRMP), which sets out how the company will supply water during the next 25 years. This report was undertaken by international water and environmental consultants, Montgomery Watson Harza Ltd. The report identifies that by 2032, if we do not reduce demand and increase water resource capacity, there could be a shortfall of 26% between water available and demand. This forecast is based on a 1 in 50 year drought with mid climate change and population increases over this period. A contribution to the cost of producing the WRMP has been made by the States Planning & Environment department and its conclusions have been supported by its officers (Water Resources Section). There are two water resource projects which are planned to be undertaken. The first project, which is planned to be progressed in 2010, will be to increase the water abstracted from the sand aquifer in the St Ouen's Bay area. It is estimated that the existing 5 borehole sources operated by Jersey Water abstract 20% of the water that is potentially available. The proposed expansion of water abstraction will require a planning approval and a licence under the Water Resources (Jersey) Law 2007. A much larger and	Reject	Should proposals to increase the capacity of Val de la Mare Reservoir come forward within the plan period, the Coastal National Park designation would be unlikely to 'seriously hinder and delay the extension of the Reservoir'. As well as the Reservoir's zoning designation, development proposals of this nature would be considered with regard to a range of Plan Policies, this includes Policy SP2 Efficient Use of Resources; Policy SP3 Sequential Approach to Development, and Policy SP 4 Protecting the Natural and Historic Environment.	The Minister is not minded to amend the draft Plan

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								future project will be the expansion of the Val de la Mare Reservoir, from its existing storage capacity of 900 ML to 2,100 ML. It is proposed to achieve this by raising the height of the dam by nine metres. Jersey Water owns sufficient land around the reservoir to accommodate the new higher top water level. The expansion will require abandonment of the existing peripheral footpaths and new footpaths to be created at a higher level. The timescale for expansion of the reservoir is not yet determined, but at the present time it is felt that it could be required between 2015 and 2020. This will be reviewed in 2014, when it is planned to update and review the WRMP. Some preliminary design work will commence in 2010, to allow construction timescales and costs to be determined. The geology in Jersey does not support adequate volumes of ground water needed for a public water supply. Therefore, we are reliant on the collection and storage of surface waters for the majority of our natural fresh water resources. The only alternative being desalinated water which is energy-intensive to produce and is not an environmentally sustainable proposition, other than as a standby resource. Given our limited natural water resources, we would request that the project to expand Val de la Mare Reservoir, which will be essential in providing a secure water supply in future years, is noted in the Island Plan. Ideally, we would also request that the boundary of the Park be changed to exclude the Reservoir. Whilst the project will require planning permission and an Environmental Impact Assessment to be undertaken, the inclusion of the Reservoir within the boundary of the National Park could seriously hinder and delay the extension of the Reservoir. This could impact on the ability of the Company to implement its WRMP and therefore has the potential to affect the long-term security of Island's water supply.			
DP378		Mr Nigel Perree		Map .1	Proposals Map	Objecting	Propose that the (hardcore) area to the North of the farm shed (Homestead, St John - West of field 166, South of field 165) is incorporated into the built up area. Secondly, that the area to the north of the hardcore is considered for gardens	This area in question is hardcore The area was used to store farm implements That the area is of no agricultural use The grassy area has not been cultivated since the farm shed was built and was used to store farm implements and potato boxes.	Reject	Site does not comply with spatial strategy and does not meet with planning Minister's criteria for protecting green fields and open spaces. This includes the extension of the built-up area boundary, into the countryside, to allow for smaller-scale incremental development opportunities.	The Minister is not minded to amend the draft Plan
DP381		Mr Andrew Lewis		Map .1	Proposals Map	Objecting	Propose that the (hardcore) area to the North of the farm shed (Homestead, St John - West of field 166, South of field 165) is incorporated into the	This area in question is hardcore · The area was used to store farm implements · That the area is of no agricultural use The grassy area has not been	Reject	Site does not comply with spatial strategy and does not meet with planning Minister's criteria for	The Minister is not minded to amend the draft

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							built up area. Secondly, that the area to the north of the hardcore is considered for gardens this is to allow a young local family who's family have farmed this land for many years but it is no longer in agricultural use or has any meaningful benefit to the agricultural sector. The area has always been hard standing and there seems no logical reason why it cannot be incorporated within the landscaping of the proposed development which would be designed in keeping with the rural environment. In making such an amendment this will have a positive impact on the area by improving what is otherwise a derelict open space.	cultivated since the farm shed was built and was used to store farm implements and potato boxes.		protecting green fields and open spaces. This includes the extension of the built-up area boundary, into the countryside, to allow for smaller-scale incremental development opportunities.	Plan
DP382		Mr Robin Troy		Map .1	Proposals Map	Objecting	Boundary to Coastal National Park I object to the inclusion of field 125 St John and the triangular grassed areas to the East of the Loop Road as part of the Coastal National Park.	Field 125 St John has a bank along its eastern and northern limit towards the Loop Road and is hidden from general view from the east by the trees and general vegetation, from the west by the Ronez quarry and block yard and from the South by a bank. The plan should be redrawn so that the limit of the Coastal National Park follows the east side of the southern section of the Loop Road and then follows to the east of the small triangular area of land to the east of the Loop Road. The inclusion of field 125 and the triangular area of land to the east of the eastern arm of the Loop Road in the Coastal National Park would affect the use of that area by the Jersey Kart & Motor Club during its various events. The youth of this Island are, year in year out, more and more disaffected by the indifference show towards them and their interests. This Island needs to support its youth and the leisure facilities and sports which are primarily enjoyed by them, which must be allowed to develop in a sensible and appropriate way. Sport and Leisure facilities, by their very nature, often necessitate large/open areas and are unsuitable to the Built-up Zone. Many promises have been made to find the Jersey Kart & Motor Club a site for a permanent track by politicians and the States of Jersey not least by the Vice President of Planning and Environment Committee in his speech to the States Assembly on the 23rd July 1996 as follows: "...the Planning and Environment Committee is conscious that the States wish to find a suitable site for the Kart Club and will endeavour to assist the Sport, Leisure and Recreation Committee and the Jersey Kart Club to find a suitable site." The Loop Road should be designated as a special development area for the development of a permanent kart track by the Jersey Kart & Motor Club and as a leisure facility.	Reject	Field 125 and the associated land are undeveloped and contribute towards the general character of this part of the coast. Any proposals to further develop leisure activities in this location need to be considered in relation to their potential impact upon the countryside character of the area and thus the application of the policy regime imposed by Policy NE6 is considered to be appropriate.	The Minister is not minded to amend the draft Plan
DP386		Mr Andrew		Map .1	Proposals Map	Objecting	That consideration be given to the designation of field 525 in St John, for Community use only. This	If field 525 is not preserved for such a purpose, there is no other stretch of land in St John that is	Reject	Field 525, St John is not being proposed by the Minister in the	The Minister is not minded to



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		Lewis					field is the only piece of land that has direct access to St Johns School without the need for pedestrians to cross a road. This in turn would ease traffic circulation, particularly at school pick up times and ensure safe access to the facilities. This field is the only piece of land that is attached to the St Johns school enabling access to open space without crossing a main road the strategic importance of this land for the possible future development of community facilities in the parish should not be underestimated. I also attach a report produced in 2006 which outlines a possible solution to dramatically improving the facilities at the school and community facilities at no cost to the public purse. Such a solution could not be achieved without this piece of land. Although for the time being the proposed asset swap with the Butlin Trust is not progressing. Alternative methods of funding are being explored but would be more difficult to achieve without field 525 being rezoned for community use only.	better situated for community use. I would therefore urge you to give this request your favourable consideration.		draft Island Plan for development. Policies SC7 will enable the Minister to determine such proposals.	amend the draft Plan
DP408		Mrs Christine Gill		Map .1	Proposals Map	Neither	I am unable to find the specific area in the document so will comment here about proposals to rezone the Jersey Steel site in Goose Green Marsh. This area is traditionally wetland, of great importance both as a sink for excess water and as a resource for wildlife (e.g. visiting geese and many other species of bird in the surrounding area). It has already been severely impacted by the La Providence development. Any further development must be strongly resisted. The roads are already completely inadequate for the current volume of traffic and the access to the Jersey Steel site is not good. We do not want a road pushed through the Perquage, which is a lifeline for pedestrians and cyclists, leisure walkers, shoppers, etc. If Jersey Steel is to leave, then the land should be allowed to revert to wetland, and to contribute to the 'green lung' in the area.		Noted	There is no proposal to rezone the Jersey Steel site: it is identified and designated as an existing industrial site, and accordingly protected by Policy EIW2, where it is explicitly named. There is, however, an error on the Proposals Map, where the site is identified as not being subject to this policy: this requires amendment	The Minister is minded to correct an error on the Proposals Map to identify the site of Jersey Steel as being subject to Policy EIW2: protection of Existing Industrial Sites
DP409		Mr Steven Harris		Map .1	Proposals Map	Objecting	I write to propose an amendment to the draft Island Plan. I propose that the whole of the Netherlee plot is zoned as Built-up Area . Netherlee is at the edge of Gorey village on Le Chemin des Maltieres. The whole site area is approximately 2625 Square Metres. Attachment A is a map produced by Jersey Mapping showing the full domestic curtilage of Netherlee alongside Field 148. Attachment B is a map of the area produced as part of the draft Island Plan. See Attached Letter	Netherlee was originally built in 1948 in a section of Field 148 by and for the manager of Les Maltieres farm (now Parcq des Maltieres Housing Estate). The house was sectioned off from Field 148 by the creation of a large garden running the full length of the Field 148 boundary. The garden/domestic curtilage has always stretched the full length of the site. Last year the States of Jersey rezoned Field 148, directly adjoining Netherlee, for the construction of 20 lifelong dwellings for the over 55s. The new zoning of Field 148, combined with the existing built-up area zoning of a section of the Netherlee plot, has left the existing countryside section of the Netherlee	Reject	Site does not comply with spatial strategy and does not meet with planning Minister's criteria for protecting green fields and open spaces. This includes the extension of the built-up area boundary, into the countryside, to allow for smaller-scale incremental development opportunities. The Plan makes it clear that throughout the plan period, sufficient land is available for the provision of Category B homes within the existing built up	The Minister is not minded to amend the draft Plan

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								<p>plot as an anomaly. Planning permission is currently being sought by the owner of Field 148 to build the 20 houses, 5 of which will directly border the Netherlee plot. Netherlee and its garden are in 2 zones - Built-up Area and Countryside Zone. The boundary between the two zones is a line arbitrarily drawn through Netherlee's garden without any consideration or reference to the domestic curtilage of the site (see Attachment C). This straddling of 2 zones is unusual for domestic properties. Approximately one third of the site area is in the Built-up Area and two thirds in the Countryside Zone. The new zoning of Field 148 has created a built-up area bordering the whole length of the Netherlee plot. Our neighbouring houses and gardens on Le Chemin des Maltieres, the houses and gardens less than 30 metres away on Rue Horman and the houses and gardens of the Parc des Maltieres Housing Estate adjoining Field 148 are all in the Built-up Area. The Netherlee plot does not flood and it is not part of the Grouville Marsh flood plain. It is not part of, or bordering the Grouville Marsh Site of Special Interest. The Netherlee plot is not a field or a wetland ; it is just a domestic garden. The Netherlee site was visited on 9 January 2008 by Deputy Anne Pryke in her role as Assistant Planning Minister and Mr T Gottard, Principal Planner. Two months later I was told by the Planning Department that if Field 148 was rezoned for lifelong dwellings the Netherlee plot would be subsequently rezoned to Built-up Area. Grouville Constable Dan Murphy has also visited the site and he fully supports the rezoning of all the Netherlee plot to Built-up Area. Constable Murphy has written a letter to the Island Plan Review team in support of rezoning (see Attachment D). See Attached Letter</p>		area. There are, therefore, considered to be no grounds to identify other sources of supply to meet housing needs, including the release of additional greenfield land.	
DP411		Mr Robin Troy		Map .1	Proposals Map	Objecting	<p>The Jersey Kart &amp; Motor Club now appeals against the placing of the Site in the 2002 Island Plan as green zone and zone of outstanding character, that the boundary of the green zone/zone of outstanding character should be amended at La Route du Nord to take the Site out of these zones, so that the Site is regarded as white zone and/or that the Site should be rezoned as a tourism and leisure area, in proper recognition of the two above permits and the Club's use of the Site over the last 12 race seasons. See attached letter</p>	<p>In summary, the Jersey Kart &amp; Motor Club considers and requests by way of appeal the following: 1. A review of the zoning for the Site in the 2002 Island Plan; 2. That the Loop Road, Fields 115, 117, 125 and surrounding lands should not have been maintained within the green zone/zone of outstanding character, especially in view of policies relating to development of recreational resources; 3. That by reason of the grant of permits in 1998 and 2002 the Loop Road, Fields 115, 117, 125 and surrounding lands should immediately be rezoned as white zone and/or a tourism and recreational area; 4. That the placing of the Site in the Green zone and zone of outstanding character (notwithstanding the Vice-</p>	Reject	<p>Field 125 and the associated land are undeveloped and contribute towards the general character of this part of the coast. Any proposals to further develop leisure activities in this location need to be considered in relation to their potential impact upon the countryside character of the area and thus the application of the policy regime imposed by Policy NE6 is considered to be appropriate.</p>	<p>The Minister is not minded to amend the draft Plan</p>

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								President's undertaking to the Sates in 1996) may hamper the Club in its ambitions for a permanent track and the development of its sport and a permanent kart facility; 5. That the rezoned Loop Road be reflected in the amendments to the draft 2009 Island Plan, on it's re-issue after the consultation period has ended. See attached letter			
DP42	Mr James Naish	Jim Naish	Biarritz Hotel	Map .1	Proposals Map	Objecting	The outline of the suggested 'Coastal National Park' encompasses private property on domestic and commercial properties and are clearly not 'National' property. We suggest that the designated Parkland is removed from the gardens of The Biarritz Hotel and is restricted to the undeveloped and uncultivated coastal headlands.	We object very strongly to the inclusion of the Biarritz Hotel gardens as these are not only looked after and cultivated by the Hotel but have also been subject to recent and past planning applications and are intended to be so in the near future as they form an integral part of the developing commercial strategy of the Hotel. To restrict the private use of this land by the tenuous restriction of designated parkland is unreasonable and will be strongly resisted. We note that the National Parklands do not include any of the property on the Plemont Holiday Village despite being far more applicable to that designation. We would ask that consistency be applied and that The Biarritz gardens be removed from the parkland even if the Plemont Village becomes included..	Reject	The intention of the Coastal National Park policy is provide the highest level of planning protection to the Islands most valued and sensitive landscapes and natural areas. The designation does not mean that all areas within this zone will become public parks or open to unrestricted public access. In this instance the designation of Coastal National Park seeks to protect the open nature of the Biarritz Hotel gardens and protect the character and landscape of the headland at Le Grouin from the encroachment of development. It is important to note that whilst the policy seeks to restrict development, expectations are afforded to "proposals for new or extended cultural and tourism attractions are sensitively related to the distinctive landscape character and heritage of the area and are in accordance with Policy NE 8 'Access and Awareness' and Policy EVE 3 'Tourism Support Facilities in the Countryside'".	The Minister is not minded to amend the draft Plan
DP43		Mrs Jennifer Holley		Map .1	Proposals Map	Objecting	Field 641 St. Peter I write on behalf of a large group opposed to the development of field 641 [including the application pending at the time of writing (P/2009/1421)} . In March 2009 we were given reason to hope that the field would be rezoned to the Green or Countryside Zone in the course of the Island Plan Review. We were very disappointed to find on inspection of the Proposals Map that field 641 remains in the Built-Up Area. Whether this is due to oversight or intent we do not know. We ask that the draft Plan be amended to include the field within the Green Zone. This letter and accompanying documents explain why we believe this should be done.	On 16 October 2009 two of our group, Mike Alexandre and Bill Jones, visited the Planning Offices at South Hill and spoke to your colleague Kevin Pilley, Assistant Director, Policy and Projects, about Field 641 and the draft Island Plan. Mr Pilley advised that, due to time constraints on the Island Plan Review Team, it would be better to send in a joint letter of representation from neighbouring residents rather than for the residents to send in individual letters as before. That is why we are making such an approach on this occasion. EARLIER IN 2009 19 March 2009 - The Planning Applications Panel met to determine P/2008/0074 (as amended) and noted that the proposal would have a substantial impact on the character and amenity of the area. A large number of objections	Minded to not amend the established boundary of the Built Up Area.	The site in question was zoned by the 2002 Island Plan as part of the St Peters village Built Up area. The thick hedgerow along the western boundary of the site provides a clear distinction between the Countryside Character Appraisals' evaluations of the land as forming part of the villages the built up area, not as part of interior agricultural land of the Western Plateau beyond this boundary. The site fits the spatial strategy preference for locating development within the built up area and not in open	The Minister is not minded to amend the draft Plan

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								from local residents had indicated the amenity value of the field. The Planning Department had recommended refusal on the grounds that the proposed development would significantly alter the character and amenity value of the site, contrary to policies G2(ii) and H8(ii) of the 2002 Island Plan. The Planning Applications Panel endorsed tile recommendation and refused the application on these grounds.		countryside and therefore minded to not amend the boundary of the established built up area.	
DP441		deputy rob duhamel		Map .1	Proposals Map	Objecting	I would like to appeal against the proposed BUA Contraction and ask whether I should also submit an in principle planning application to ensure that the whole property stays within the existing zone.	I contacted you and others at the Department in November last year, before and since to enquire into the reasons for an Island Plan Built Up Area Contraction proposal which would affect my property. The range of buildings known as Douro Terrace was envisioned in 1834 as to comprise eight units but circumstances arose that left the terrace unfinished. The developer ran out of funds. The three sites to the east of No.5 were excavated and have formed part of NOS'S domestic curtilage ever since. I bought the property in 1985. Mistakes were made in drawing up the built up area within a past Island plan document and I had the then Committee under the presidency of John Le Sueur rectify the errors and to correctly place Douro Terrace and my garden in the Green Backdrop built up area. The lawn and shared vegetable gardens to the south were also so designated. This designation has continued to present. The new proposal suggests a split zoning which will leave my house in the Green Backdrop Area and my garden in the new Green Zone. I have looked at the zoning changes on the map and have found very few examples of other properties being similarly affected. I am told that the usual practice is to keep the whole of a property in one zone or another and that the proposal for my property is an oversight which did not take into account the walled boundaries and single ownership. There are other large garden areas which form part of the properties on the edge of the built up area for example at Les Varines, St Saviour which are not being split zoned. A policy inconsistency therefore arises should the new designation proceed.	Reject	The site has been included within the green zone in accordance with the Minister's criteria for protecting open spaces and greenfields, and to restrict the opportunities for smaller scale incremental development into the countryside. In defining the extent of the Built up area boundary, consideration is given to development that has taken place. Not to land that was once intended to be built upon. Elevated by the escarpment, the site occupies a prominent position and therefore the impact of development of this site would extend over wide area of below. These characteristics differentiate this site significantly from the properties in Les Varines which sit on top of the plateaux and are hidden on three sides by existing development. The Island Plan Review: Policy and Zoning Amendments Schedule contains a schedule of Built Up Area boundary amendments. Other examples where the policy of amending the built up area boundary in sensitive areas include; - 5 amendments concerning prominent land on the edge of the Built Up Area - 16 amendments concerning open land and fields on the edge of the Built Up Area. - 11 amendments that reflect a more accurate Built Up Area	The Minister is not minded to amend the draft Plan



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										boundary reflecting development.	
DP455		Mr Charles Alluto	The National Trust for Jersey	Map .1	Proposals Map	Objecting	(i) The Trust notes that it is proposed that the National Park boundary embraces all those parts of the Island of highly sensitive and valuable landscape quality, in addition to St Ouens Bay that is vulnerable to change and damage and which warrants the highest level of protection against development. The Trust is of the view that the current proposed boundaries unfortunately fail to achieve this objective especially in relation to the north coast and the land above the escarpment of St Ouen's Bay.	The Trust believes the Countryside Character Appraisal does not indicate that it is simply the north coast heathlands (Character Type A1) that are worthy of protection, as currently designated, but rather the immediate coastal landscape including such unique areas as Crabbé. Please see Character Types and Recommendations for D1, E1, E3, and E4 which fully endorse high levels of protection and therefore support the Trust's recommendation. Visitors and locals alike are familiar with the concept of a national park protecting wider landscape value and it is incomprehensible as to why Jersey should not be adopting a similar approach in terms of its designation. The Trust would therefore like to request that the boundaries are revised as per the attached document, and that our coastline is given the recognition and protection it truly deserves.	Reject	The CCA identifies these areas as being of 'high' landscape value (as opposed to 'very high', applied to those other areas within the CNP) and, whilst sensitive, the proposed policy regime set out in NE7, together with the use of the CCA as a tool, as set out at Proposal 4, would provide an appropriate policy regime for these areas.	The Minister is not minded to amend the draft Plan
DP487		Mr Paul Harding	The Association of Jersey Architects	Map .1	Proposals Map	Supporting	The AJA would like to specifically commend the clarity of the Island Plan Proposal Maps accompanying the Plan, which are a distinct improvement on the 2002 Island Plan maps.		Noted		The Minister notes support
DP512		Mr Paul Harding	The Association of Jersey Architects	Map .1	Proposals Map	Objecting	We are extremely concerned with an almost unnoticed 'reverse rezoning' in the 2009 Draft Plan that proposes expansion of the Green Zone by contracting the Built-Up area. This only becomes apparent right at back of the accompanying 'Policy and Zoning Amendments Schedule' where it is clarified the Built-Up Area amendments results in "a net reduction of land designated as Built Up Area by 113 acres". This conceivably equates to losing some 3,300 future dwelling capacity at an average yield of 30 houses/acre!! We consider this is a major structural flaw in the 2009 Draft Plan.	The 2009 Draft Plan fails to give any foundation or reasoning behind such a significant reduction of the Built-Up Area. The Strategic Options survey gave no basis for such a change, referring to containing development within the existing Built-Up area as it was defined in 2008, never mentioning it was intended to significantly reduce the Built-Up Area. Subsequent para. 6.51 anticipates that 4,625 homes will be found within the remaining reduced Built-Up Area during the Plan period to meet the projected demand for 4,000 homes over the same period. This anticipation is based on substantially increasing density of housing in St Helier (including the Waterfront) by over 2,500 homes. If this does not transpire the Plans predictions suggest there will be a shortfall in excess of 1,000 homes. Where is the replacement housing to be found? The AJA submits there is no case for reducing the Built-Up Area extent. Rather there is potential for rationalising and consolidating the Built-Up area boundary to maintain and ensure future housing provision, without having any adverse impact on the Green Zone and while maintaining the strongest protection of our Countryside.	Reject	The Spatial Strategy clearly states that there is a strong desire to protect the Islands countryside and that there is little support for the "extension of the built-up area boundary, into the countryside, to allow for smaller-scale incremental development opportunities". Furthermore whilst there has been overall a net reduction in the total area of land allocated as Built Up Area, this does not equate to lost of 113 acres of 'developable' land. Table 3 of the Policy and Zoning Amendments clearly sets out the justification for amending the boundary of the Built-Up Area. Of the Built Up Area boundary contractions, a total an area of 66.7 acres, were previously also zoned as Important Open Space and therefore protected from development. The other significant reason for the perceived 'net' loss of land within the 2002 Built-Up area boundary	The Minister is not minded to amend the draft Plan



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										can be accounted by the removal of the undeveloped 2002 H3 and H4 greenfield housing sites, (50 acres).	
DP559		Deputy John Le Fondre		Map .1	Proposals Map	Objecting	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
DP585		Deputy John Le Fondre		Map .1	Proposals Map	Neither	Open Space - specific remark concerning St Lawrence. The development of La Providence (St Peter's Valley) was allowed to encroach into an area of Important Open Space for the purposes of building a community centre and one or two other minor matters. The Community has yet to be constructed, and I note that the area previously earmarked as important open space has now been rezoned to be built up area. This therefore raises the spectre of formally green field, having had the protection breached, now being potentially redeveloped through a 'stealth' rezoning. Hopefully this is just a slip of the pen, however there is still a significant degree of scepticism in St Lawrence and parts of St Peter concerning that development, and this would not assist matters. In my view this area should be redesignated as some form of protected open space, albeit a mixture of hard and soft landscaping In addition I note that the fields immediately below the La Providence development that were originally purchased by the developer have been designated protected open space. However the field that is surrounded on 3 sides by this zoning, has not in itself been zoned as a protected open space. To me this seems to be an anomaly, which I raise purely for consistency.		Amend plan	The land immediately to the east of the housing at La Providence, has been granted planning permission for the road entrance to the development, a community building, car parking and play areas. The play areas have subsequently been laid to grass and the community building will shortly be under construction. In the current IP this land did not form part of the zoned housing site (H2(1). In fact, it was in the 'Countryside Zone' (C6) and was also designated as 'Important Open Space' (BE8). There is another anomaly to the west of the housing site. Some landscaped peripheral amenity areas and a large part of the landscaped berm has been included in the built-up area. The developer was unable to acquire Field 862 to include within the required public amenity area, because of the unwillingness of the owner to sell. Nevertheless, the field is an important part of the natural wetland and warrants the same degree of protection as the surrounding fields. The assertion is made that there remains a significant degree of scepticism concerning the La Providence development: in response, it is relevant to note that the application process was subject to an unprecedented amount of public consultation;	The Minister is minded to amend the draft Plan to address minor anomalies and inconsistencies, as follows: (a) the lawned play area sites and the southernmost car park (intended in large part to serve the wider community / public amenity area) should be excluded from the built-up area and included in the Green Zone and the Protected Open Space designation; (the other 2 car parking areas and community building site should remain in the built-up area); (b) the track and the landscaped areas to the west of the community building site should be excluded from the built-up area and included in the Green Zone; (c) to

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										the developers had to address numerous and demanding planning requirements arising from the identified issues; and the decision to grant planning consent was the subject of a Committee of Inquiry, which considered all outstanding points of concern. The purpose of the Island Plan consultation process has been to be open and transparent and provide people with an opportunity to comment: the Minister will consider and respond to any such points raised with a view to amending the draft Plan, where necessary.	the west of the housing site part of the landscaped peripheral amenity areas and a large part of the landscaped berm has been included in the built-up area. This area should be excluded from the built-up area and included in the Green Zone and the Protected Open Space designation. (d) Field 862 should be designated as Protected Open Space as well as Green Zone.
DP625		Deputy Rondel		Map .1	Proposals Map	Objecting	I write re Mrs. M.Perree of Homestead St John re the Draft Island Plan 2009. As Parish Deputy I have represented the Family over many years, reference this Area of Land and the farm outbuildings, the last occasion was for change of use as a skip yard for Regs Skips all to no avail. Given the outbuildings and area of Hard standing at the rear of Homestead have been vacant over many years, will the review panel give consideration to including the Hard standing area in the built up area of the draft island plan 2009, so the new dwellings to be put on this site can make full use of this small area, further to this the small paddock to the north of the hard standing be for domestic use of the property.		Reject	Site does not comply with spatial strategy and does not meet with planning Minister's criteria for protecting green fields and open spaces. This includes the extension of the built-up area boundary, into the countryside, to allow for smaller-scale incremental development opportunities.	The Minister is not minded to amend the draft Plan
DP629	Mark Fauvel	Mr & Mrs B Maindonald		Map .1	Proposals Map	Objecting	I have at the end of last week been instructed by my clients, Mr. & Mrs. B. Maindonald of Cornfields and his mother, Mrs. M. Maindonald, to seek zoning of their land which includes field 652A to be designated as Built Up Area in the Proposed New Island Plan.	Currently, the group of houses that comprise the fairly dense Hamlet along La Ruelle de Faldouet, La Rue D'Aval, La Grande Route de Faldouet, Le Mont Gabard and La Ruelle Gabard are shown as in the Countryside Zone of the 2002 Island Plan, and are proposed as being within the Green Zone of the proposed New Island Plan. Please see the property owned by my client within the dotted red line and the extent of the built area shaded yellow on the attached 0.5. Map extracts, for your information. New houses have been built within this area during the life of the existing Island Plan and we are puzzled why this hamlet was not originally designated as Built Up Area in the 2002 Island Plan, as clearly the Hamlet constitutes a built up area, as other groups of houses are close	Reject	The Countryside Character Appraisal's evaluation is that the overriding local character of the area is 'Interior Agricultural Land' and not a Built Up area. This designation remains consistent with the 2002 Island Plan Island plan designation of the land as Green Zone. Site does not comply with spatial strategy and does not meet with planning Minister's criteria for protecting green fields and open spaces. This includes the redefinition and extension of the built-up area boundary, into the countryside, to allow for	The Minister is not minded to amend the draft Plan

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								by. We believe this particular site could very easily constitute "infill land" to provide much needed housing for parishioners or the wide r island population as well as his own families siblings and my client is keen to pursue the building of a number of houses on this land behind his and his mother's house, which includes field 652A. Please note that due to existing trees and hedges there is minimal overlooking or intrusion into the countryside and with further tree planting this potential site could assist the housing needs of the island without being detrimental to its beauty. In addition, if this site was zoned to assist future housing, I have a developer who has expressed a very keen interest in providing an exemplar development of "Affordable Eco Homes" to a standard not yet seen within the island.		smaller-scale incremental development opportunities. Any development proposals put forward within in this location need to be considered in relation to their potential impact upon the character of the area. The application of the policy regime imposed by Policy NE7 is considered to be appropriate given the character of the local area. Site does not comply with spatial strategy and does not meet with planning Minister's criteria for protecting green fields and open spaces. This includes the extension of the built-up area boundary, into the countryside, to allow for smaller-scale incremental development opportunities.	
DP654		Zelah Limited	Zelah	Map .1	Proposals Map	Objecting	Land at Rue du Huquet St Martin I should like to put forward the above land for inclusion as Land for Development in the New Island Plan Review. There is currently a residential commercial Office building on the site, and planning was previously granted for a residential unit. The site is outlined in Red on the enclosed OS Map and a Letter from the Department of Agriculture & Fisheries is also enclosed. Opposite the Site & Coloured Green is a residential care Home- The Ronceray Retirement Home. Might I suggest that the site would be suitable for a single storey Specialist E.M.I. Unit ( Elderly Mentally Infirm) which are in very short supply in the Island and for which there is undoubtedly a growing demand.		Reject	Site does not comply with spatial strategy and does not meet with planning Minister's criteria for protecting green fields and open spaces.	The Minister is not minded to amend the draft Plan
DP655		A J Sullivan		Map .1	Proposals Map	Objecting	Field 745 St Saviour Following our discussions recently at St Saviour's Parish Hall, I would be grateful if you would put forward my request that the above field be considered for removal from the Green Zone under the new Island Plan and considered for use for a single residential unit. I have attached a copy of a site plan with the area marked in red. The site has road access, mains water, drainage and electricity. As can be seen from the site plan it is surrounded by developed land, 770A now being in commercial use. It can only be seen from the upper floors of the high rise blocks at Le Squez, the boundary to the South being a high granite wall. The land has been confirmed as unsuitable for agricultural use. A development of one unit would improve the condition of the eastern boundary giving improved security to the		Reject	Site does not comply with spatial strategy and does not meet with planning Minister's criteria for protecting green fields and open spaces. This includes the redefinition and extension of the built-up area boundary, into the countryside, to allow for smaller-scale incremental development opportunities. The Plan makes it clear that throughout the plan period, sufficient land is available for the provision of Category B homes within the existing built up area. There are, therefore, considered to be no grounds to identify other sources of supply	The Minister is not minded to amend the draft Plan

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							adjacent property in respect of the hillside, which caused severe problems some years ago and has never been fully resolved. A Clearly defined building line to the North could easily be established. Should it be of any assistance I have an enlarged site plan available together with ground sections on a North / South axis, which clearly demonstrate that there would be no detrimental 'overlooking' of adjacent units. Any further information you may require can be provided. The field has been in my possession since the early eighties, having retained it when I sold off the adjacent property , La Freminerie.			to meet housing needs, including the release of additional greenfield land.	
DP669		Deputy James Reed	Education, Sport and Culture	Map .1	Proposals Map	Objecting	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 '. 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 to the above sites, the Ministerial Team recommends the status presently afforded under Policy sea 1 of the Island Plan should be extended to the following - (iv) Field behind Grouville School: The owner of the field between the school playground and La Rue des Pres has expressed an interest in making the southern part of this field available to the school ,		Noted, and minded to accept proposals to safeguard additional land for educational purposes, where the evidence of need can be demonstrated.	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	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.

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							subject to planning permission being granted for the development of the northern part of the field for housing, and discussions have taken place between the owner of the land and the Property Holdings Department in this connection. The Ministerial Team would welcome the acquisition of this land for use as an outdoor play area for the school, and in this connection would ask for this land to be recognised under Policy SCO 1. (v) Field 782, St. Ouen: Field 782 adjoins the grounds at Les Landes School, and although it is currently used for farming , it is possible that it may become available in future for acquisition for use by the school, e.g. as an extension to the existing outdoor play area and playing field . The Ministerial Team would welcome the designation of the field under Policy SeQ 1, as this would then give the States first option in the event of this land becoming available. (vi) First Tower School. St. Helier: The field at the foot of Tower Road, next to the junction between Tower Road and Bellozanne Road, is currently used for agricultural purposes, but it is understood this land may also become available in the foreseeable future. In this event, the Ministerial Team would welcome the acquisition of the land for conversion to a playing field for First Tower School , and therefore proposes that it be designated under Policy SCO 1.			another form of open space that has a greater community benefit provided that the requirement for additional open space at Grouville School can be justified, particularly when Field 263 has only recently been provided and when the school also has relatively extensive grounds and access to Field 304. Field 782, St. Ouen: the further safeguarding of land to provide appropriate facilities to Les Landes School would be supported where there is demonstrable evidence of need Field 1533, St. Helier: the further safeguarding of land to provide appropriate facilities to First Tower School would be supported where there is demonstrable evidence of need	
DP67		Senator Sarah Ferguson		Map .1	Proposals Map	Objecting	I note on the map for St Brelades Bay that the western boundary for the designated park area includes the path down to the beach owned by the Biarritz Hotel Limited. This is entirely unreasonable. It is in the interests of the company to keep this link to the beach for the convenience of its clients. However, subjecting it to the strictures required for a "reserve" would limit our use of it as well as perpetrating the view that because it is a "park" it is for public use. It is essential for the hotel as our access to the beach and this designation, for example, would prevent our improving the access. If we intend to improve our eco activity, this particular area would be the obvious place for locating a geothermal system. I must protest at this designation of this narrow strip of land and ask that it revert to the original designation.		Reject	The intention of the Coastal National Park policy is provide the highest level of planning protection to the Islands most valued and sensitive landscapes and natural areas. The designation does not mean that all areas within this zone will become public parks or open to unrestricted public access. In this instance the designation of Coastal National Park seeks to protect the open nature of the Biarritz Hotel gardens and protect the character and landscape of the headland at Le Grouin from the encroachment of development. It is important to note that whilst the policy seeks to restrict development, expectations are afforded to "proposals for new or extended cultural and tourism attractions are sensitively related to the distinctive landscape character	The Minister is not minded to amend the draft Plan



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										and heritage of the area and are in accordance with Policy NE 8 'Access and Awareness' and Policy EVE 3 'Tourism Support Facilities in the Countryside'.	
DP670		Constable Dan Murphy		Map .1	Proposals Map	Objecting	Recommendation to amend the Draft Island Plan for the zoning of Netherlee, Le Chemin des Maltieres, Grouville, JE3 9EB.	Field 148 has been rezoned specifically for the development of 20 lifelong dwellings for some of my Parishioners and other Island residents. Netherlee borders Field 148 along its entire North West border and I would support the rezoning of the Netherlee site to Built up Area. The plot is well out of proportion to the dilapidated 3 bed roomed house that stands on it and I consider the plot would be ideal for new family homes. Netherlee is closer to Gorey Village than Field 148 and all the location reasons for the rezoning of Field 148 apply equally to the Netherlee plot. The current zoning takes no account of the physical characteristics of the plot, or the reality of the new Built up Area of field 148. The Parish would be served by the entire Netherlee plot being zoned as a Built up Area. I therefore recommend that a revision is made to the Draft Island Plan to designate the whole of the Netherlee plot as a Built up Area.	Reject	Site does not comply with spatial strategy and does not meet with planning Minister's criteria for protecting green fields and open spaces. This includes the extension of the built-up area boundary, into the countryside, to allow for smaller-scale incremental development opportunities. The Plan makes it clear that throughout the plan period, sufficient land is available for the provision of Category B homes within the existing built up area. There are, therefore, considered to be no grounds to identify other sources of supply to meet housing needs, including the release of additional greenfield land.	The Minister is not minded to amend the draft Plan
DP671		Mr Patrick McCarthy		Map .1	Proposals Map	Objecting	Revision of Island Plan--re. Field 263A Grouville I am writing to you to make a representation regarding the proposed revision of the Island Plan with reference to the above field in Grouville. I am aware that as matters stand, it is intended to designate this small piece of land as Protected Open Space within the area of Grouville Primary School. I am also aware that the Education Department is very keen to acquire a significant portion of my land in order to extend the available amenity space for pupils at the school. In particular, the southern half of Field 263A would make a natural 'bridge' between the existing school playground to the East and the recently created sports field (formerly Field 263) to the West. Furthermore, the acquisition of this land would help the school to alleviate a serious ongoing parking problem that afflicts the surrounding roads every day for both parents and staff. Despite having reached an agreement, negotiations to purchase this land on behalf of the public were aborted by Property Services at the last minute some years ago, even though I was (and remain) a willing seller. As a result of this decision, it seems that the land is effectively blighted for the foreseeable future. Thus, if the intention is to provide land for Grouville School via the proposed designation, then it is difficult to see how that might happen. I would like to suggest that the		Minded to reject zoning Field 263a for the purposes of providing housing land. Minded to amend the draft Plan, at SCO1 and the Proposals Map, to support the further safeguarding of land for educational purposes	Site does not comply with the planning Minister's criteria for protecting green fields and open spaces. The Plan makes sufficient provision for the supply of Category A homes and therefore, there are considered to be no grounds to identify other sources of supply to meet housing needs, including the release of additional undeveloped greenfield sites. In addition the department is minded to accept proposals put forward by the Education Sport and Culture to safeguard land additional land for educational purposes, where the evidence of need can be demonstrated. This includes part of Field 263a for the use by Grouville School.	The Minister is minded to reject zoning Field 263a for the purposes of providing housing land. 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 of part of Field 263a, where there is justifiable evidence of need.

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							<p>entire field is not intrinsically an important open space, as described in the draft Island Plan (Table 7.1, Typographies of open space in Jersey) especially given that it is hidden from public view and access is via a privately owned driveway. It seems to me that the proposed designation is an inflexible approach to the best use of the land. It might look neat and tidy on the Island Plan map, but in reality, it could result in the field becoming increasingly neglected, overgrown by unsightly weeds, yet surrounded by housing and school boundary fences for years to come. Where is the sense in that? Would it not be better to take a pragmatic approach that could be of real benefit to the whole community in a number of ways? My proposal is as follows: a) The southern half of the field would be gifted to the public for use as amenity space by Grouville School b) The remaining, northern, half of the land would be designated as Category A housing, but with a condition that only a limited number of low-rise retirement homes would be permitted to be built (in such a way as to minimise the impact on neighbouring properties) I would refer you to Policy SC04 of the proposed Island Plan which states that open space will be protected "except where it can be demonstrated that: 1. its loss will have no serious impact on the adequacy, quality and accessibility of provision of the type of open space affected by the proposal; or 2. alternative replacement provision of the same or better extent, quality and accessibility of open space can be provided; or 3. the proposal will be of greater community or Island benefit than the existing open space resource; and 4. its loss would not seriously harm the character and appearance of the locality. On all counts, I believe that my proposal can be seen to be meeting these requirements. Furthermore, I would argue that it would also meet the requirement of Policy SC05, relating to the "enhancement" of open space. Please also bear in mind that my proposal would only result in the loss of part of the existing open space, whilst the most significant portion would clearly be enhanced by its usefulness and accessibility to the pupils of Grouville Primary School. I believe that this proposal should find favour across a wide spectrum of opinion: public, political and professional, offering as it does a common sense way out of the current impasse. I trust you will give careful consideration to my representation, and I await your response with interest.</p>		of part of Field 263a, where there is justifiable evidence of need.		
DP672		J B		Map .1	Proposals	Objecting	My representation concerns the requested rezoning		Reject	Site does not comply with spatial	The Minister is

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		McLean			Map		of a 9 vergee field (Field 530) which my wife and I own next to our home 5 Welton Way, off Princes Tower Road in St Saviour. It is my opinion, that, taking account of both the wider housing considerations and also the locational and detailed suitability of Field 530 for housing as outlined above, there is a reasonable case for the requested re-zoning of Field 530 for either inclusion in the adjacent built-up area boundary or alternatively it's re-zoning for Category A retirement homes.			strategy and does not meet with planning Minister's criteria for protecting green fields and open spaces. This includes the redefinition and extension of the built-up area boundary, into the countryside, to allow for smaller-scale incremental development opportunities. The Plan makes sufficient provision for the supply of Category A homes and therefore, there are considered to be no grounds to identify other sources of supply to meet housing needs, including the release of additional undeveloped greenfield sites	not minded to amend the draft Plan
DP685		Miss M C Pinglaux		Map .1	Proposals Map	Objecting	I am writing with reference to the property named Ocean View, Petit Port Close, St. Brelade JE3 8HJ and field no 398a belonging to my parent s Mr & Mrs Alain Pinglaux. Recently an application has been submitted requesting a change of zone from countryside zone to built up area, as this would bring the zones in line with the neighbours.	The reason for the request is not only so the zones are brought in line with the neighbours either side but also with a view that both my sister and I may be able to build a property on the land. I currently live in a one bedroom flat in Quennevais Parade which is not ideal as I work shifts. On occasions I have to attempt to sleep during the day which at times is very difficult due to the noise surrounding the busy area that I live. I have always been a resident of St. Brelade as have my family . In the future I would like to bring up my own family in the area of which I was brought up in. Due to the development of one of the neighbours who have built an extension on the original dwelling and also added an additional two dwellings on the land. I feel it would only be fair that the areas are all zoned giving the same opportunities to build. The dwellings that both my sister and I have in mind would be to house a small family.	Reject	Site does not comply with spatial strategy and does not meet with planning Minister's criteria for protecting green fields and open spaces. This includes the extension of the built-up area boundary, into the countryside, to allow for smaller-scale incremental development opportunities.	The Minister is not minded to amend the draft Plan
DP686		Mrs Donna Jacklin		Map .1	Proposals Map	Objecting	Ocean View, Petit Port Close, La Route du Petit Port. St Brelade, JE3 8HJ - Re-zone land into Built up Area - Field No 398a	I am writing with reference to the above and to request consideration to re-zone part of my parents (Mr & Mrs Pinglaux) land. My parents purchased Ocean-View over 20 years ago, with the hope that they could, in the future provide land for both my sister and I to build on. With the expense of property in Jersey being so very high, this was the only way for my parents to hopefully be able to keep us (my sister and I) housed without being driven away by the expense of the Island. I believe that the planning department are only encouraging the development of the Town area. I currently live in town and it is not a suitable situation for my young family to be brought up in. My husband runs his own business, and the Parish have decided to drive out the working man, by banning any commercial vehicles from the town	Reject	Site does not comply with spatial strategy and does not meet with planning Minister's criteria for protecting green fields and open spaces. This includes the extension of the built-up area boundary, into the countryside, to allow for smaller-scale incremental development opportunities.	The Minister is not minded to amend the draft Plan

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								<p>streets. My children are exposed to drunken behaviour both on the town streets and in the parks. The town parks are not safe for children to play on due to dangers of needles and drunks being present . In addition, I am not able to get a place for my daughter at a school in town, but have been allocated a space at Bel Royal, which is not practical. However should we be granted permission to build, my daughter would be placed at La Moye School which is a short walk away. Prior to my parents applying for the re-zone, I telephoned the planning department and spoke to one of your officers , who, when she looked at our proposed area, did not see any reason why my parents building zone should not be brought in line with the neighbours next door as they have carried out a large amount of development over the past few years (see example No 1). Over the years my parents' neighbours have been granted permission to build quite substantial buildings, when originally the size of the property on the land was the same as my parents. (see example No 2). At present the field (agricultural land) has now disappeared, there are now two large houses, and a large extension on the original bungalow, with swimming pool, pool house and aviaries. The additional main house is considerably larger than the old shed which was demolished to allow the construction of this house, the two bed roomed house has been built on Countryside zone, so has the aviaries, the swimming pool, the pool house and the extension to original bungalow (unfortunately due to t he date of the photograph this does not show the bungalow extension).Therefore we see no reason why our request should not be permitted (see example No 3). As already stressed, my parents wish to make a safe and secure home for both of their daughters, so that we (my sister and I) can raise our families in a safe and secure environment. Taking the above into consideration, and the fact that the building on my parents land will be to house their children (therefore essential), I am sure that you would agreed, that due to the changes permitted to their neighbours (with similar land size originally), that it would be fair and reasonable to allow the re-zoning. I am hoping that you will find my request favourable, as my parents have worked very hard, and deserve to have the same planning rights as the neighbours next door, so that they can provide for their children too. I look forward to hearing from you in due course.</p>			

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DP687	Mr Michael Stein	Mr Alan Pinglaux		Map .1	Proposals Map	Objecting	Ocean View La Route du Petit Port St Brelade JE3 8HJ Re-zone land into Built Up Area	We have employed MS Planning to help us support our case to re-zone part of our land. After great expense, we feel that the reports issued by MS Planning and sent to you, give full details of why the land should be granted permission to re-zone. However, in order to stress how important this is to our family, we feel it is best to write in to you personally to express our feelings on the matter of re-zoning. We feel justified in asking you to consider our request to re-zone the small part of our land (as outlined by MS Planning) to the Built Up Area category, as this would bring us in line with our neighbour. We are requesting to re-zone in order to accommodate our children , we are a Jersey born family I was born in this parish As you would hopefully understand, it is our worst fears that, should you turn down our request, our children and grandchildren will have no option by to move overseas, as raising a family and purchasing a property is very expensive in Jersey.	Reject	Site does not comply with spatial strategy and does not meet with planning Minister's criteria for protecting green fields and open spaces. This includes the extension of the built-up area boundary, into the countryside, to allow for smaller-scale incremental development opportunities.	The Minister is not minded to amend the draft Plan
DP712		Mr Alistair Coates	Clos du Pressoir Resident s' Associati on	Map .1	Proposals Map	Objecting	Request to re-zone Field 588 / 589 (Clinique Pinel) St Saviour to Important Open Space	The Residents Committee has no objection to the principle of designating the built form of Clinique Pinel /Hosewood House as Built-up Area as we appreciate that the Health Department may need to rationalise their assets sometime in the future. However , w e strongly believe that the green area that sits immediately to the north of La Route de la Hougue Bie and east of La Ruettes des Ecorvces (Fields 588 /589) should be designated as an Important Open Space similar to the area immediately north of the principal St Saviours Hospital directly opposite the site. Attached is a plan showing what we believe to be an acceptable compromise in this in stance and one which will help maintain the rural character of the area, while allowing for some amount of new homes to be built. It will also help consolidate the Built-up Area and prevent the further encroachment of residential development s into the Island's open countryside. Our principal reasons for requesting this Plan amendment are as follows: - - The retention of the green area as an Important Open Space would visually link the two hospital sites and serve as a reminder of the Island's social history. It would also serve to strengthen the area's landscape character which is typified in the upper eastern segment of the island by open, undeveloped land along the roadside, interspersed with relatively small clusters of development. -The road between St Helier & Maufant is a continuous ribbon of development. When the Jersey Dairy site at Five Oaks is developed, this could act as a catalyst for extending a limb of development from	Reject	Field 603 is zoned as Protected Open Space because it is an active part of the setting, intrinsically linked to the built form of St Saviour's hospital, unlike Fields 588/589. This a very small built up area, surrounded by the green zone it is therefore well served by a wide variety of green and open spaces with opportunities for informal recreation activities. Most notability this includes Queens Valley Reservoir.	The Minister is not minded to amend the draft Plan



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								Five Oaks, east wards. The road from Five Oaks to La Hougue Ric and beyond to Gouray is predominantly rural in character. Further erosion of this character will be likely to detrimentally impact upon the intrinsic landscape character of this Eastern Plateau. - The development of the whole of the Clinique Pinel site would be likely to give rise to increased levels of private car trip generation owing to the lack of facilities within walking or safe cycling distance and an infrequent bus service. Such a proposal is, accordingly, considered to be contrary to the States' Objectives which seek to support Departments and agencies in developing programs to help achieve a reduction in the need to travel through a land-use strategy and development policies that influence the location of development relative to transport provision. - The retention of the green area would release a valuable asset for families of any new development here, by allowing an accessible amenity space for informal play, or allotment gardens etc. We hope that you will give due consideration to our modest request.			
DP714		Mr & Mrs NJ & J Fromage		Map .1	Proposals Map	Neither	We are writing to ask if you could give consideration to our application being included in the revised Island Plan. We would hope to build two first time buyer homes, (I believe Category B), in the section of Field 873 still in our ownership. Our plan would be to build these homes adjacent to La Verte Rue thereby enabling the remainder of the field between our selves and the new section of the retirement homes to be used as curtilage. As you will have seen from our previous letters we have access to all services, As mentioned previously, we recently sold a section of Field 873 to the Parish of Trinity thereby enabling them to maximise the 2nd phase of their retirement home development and after being approached by the Parish regarding surface water drainage, we have also agreed to the Parish 's request to take their surface water drains across our land as the facility serving the existing retirement homes will be done away with as part of the new development scheme. Field 873 is surrounded North, East and West by land which has been white zoned. To the East of La Verte Rue is Field 816, to the North is the small triangle piece of land Field 817 and to the West is the new retirement home development. Also part of our Field 873 was changed to domestic curtilage when we bought the property in 1995. I look forward to hearing from you on this matter.		Reject	Site does not comply with spatial strategy and does not meet with planning Minister's criteria for protecting green fields and open spaces. This includes the extension of the built-up area boundary, into the countryside, to allow for smaller-scale incremental development opportunities. The Plan makes it clear that throughout the plan period, sufficient land is available for the provision of Category B homes within the existing built up area. There are, therefore, considered to be no grounds to identify other sources of supply to meet housing needs, including the release of additional greenfield land.	The Minister is not minded to amend the draft Plan
DP715		Mr John Reynel		Map .1	Proposals Map	Objecting	I am aware that the current Island Plan Which was approved by the States of Jersey in 2002, is now in	The green paper for the revision to the island plan, under section GD1 "General Development Control	Reject	Site does not comply with spatial strategy and does not meet with	The Minister is not minded to

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							<p>the process of being reviewed and is available for consultation. I understand that at the moment representations can be submitted to the Planning and Environment Department for consideration of amendment or inclusion into the next Island Plan. On this basis, I should be grateful if you would give your consideration , under the Island Planning Review 2008 - 2023, the proposal for rezoning an area of land for development known as the corner field, adjacent to fields 713 &amp; 715, situated on the east end of La Rue des Caberettes in St. Martin.</p>	<p>Policies " 1.6 Sustainable development, asks how a "development can contribute towards a more sustainable form and pattern of development in Jersey". The policy also asks what effects the development would have on the local environment and its effects on the surrounding area, neighbours land and buildings. The policy also seeks to ensure that any new development has some value, and that it fits in with the travel and transport policies. Finally the policy seeks to ensure that development achieves design quality. I believe that a development within this, or similar parcels of land can fit into the policy of sustainable development and would contribute towards a more sustainable form and pattern of development within Jersey. A development within similar areas of land adjacent to existing properties would actually complete these localised developed areas, by forming complete smaller rural residential zones and without having destroyed large workable fields. It is also worthy of mention that areas of land such as the triangular shaped field mentioned above will have many of the major services they require running close by. Some small infill pieces of land, such as in the fields mentioned above, a water borehole and foul drainage, or may be present within adjacent roads again as in the land mentioned above, such as electricity, telephones cables and a possibly even a gas supply. Development proposals of this nature should not automatically be seen as encroachment into the countryside and thus rejected out of hand, particularly when they do not create any major inroads into open spaces or contribute to a loss of good workable agricultural land or wild habitats. They could be regarded as an opportunity to provide additional homes. Over the period of time that I have been endeavouring to obtain planning permission for development within the above mentioned piece of land, (which I was informed by the farming fraternity and the former Agricultural and Fisheries Department), had no agricultural value due to its size and shape, the need for more development land and thus provision of affordable dwellings has become even more urgent. The constant refusal of planning permission on what, in my view, is suitable infill land has continued to exacerbate the problem that the States of Jersey face of not being able to provide family homes for many local residents. Infill developments of this nature need not destroy the aesthetic, commercial or environmental aspects of the country side our quality of life, as</p>		<p>planning Minister's criteria for protecting green fields and open spaces. This includes the redefinition and extension of the built-up area boundary, into the countryside, to allow for smaller-scale incremental development opportunities. The Plan makes it clear that throughout the plan period, sufficient land is available for the provision of Category B homes within the existing built up area. There are, therefore, considered to be no grounds to identify other sources of supply to meet housing needs, including the release of additional greenfield land.</p>	<p>amend the draft Plan</p>

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								<p>minor developments can be sympathetically screened from agricultural and sensitive land by hedgerows and suitable tree planting. Many of these small pieces of land are often separated by other man made features such as roads, houses and even old farm buildings. Development of this nature, if carried out in an aesthetically pleasing way, does need to impact on its neighbour's enjoyment of their own properties. This is the case regarding the corner field, adjacent to fields 713 and 715 in St. Martin, in that the surrounding properties are facing away from the piece of land. With good quality design these smaller developments can be pleasantly, sympathetically and even environmentally screened so as to maintain a good quality of living for any surrounding properties. Over the years, I have witnessed numerous properties being developed in areas on open headlands and in areas of aesthetically and environmentally sensitive land. These areas can only be described as encroachment into green zones and it appears, for no other reason than personal status or financial gain. I, like many people, support Planning and Environment's wishes to prevent undesirable or unsympathetic developments within the green zones and agricultural areas. Arable land and wildlife habitats, such as St Catherine's woods can never be replaced once lost to development. However, there must be some allowances made for small scale developments that do not impose themselves unfavourably on the country side and would go some way towards providing additional valuable housing the Islands population, even if within existing rural areas. May I ask that those officials involved in the current planning review look again at the proposed policies on development within the green backdrop zones. If any housing can be gained by these minor developments, such as in the area of land mentioned above, or other areas of a similar nature and can be shown to provide potential infill development opportunities, without being detrimental to the open country side, then amendments to the Islands development plan 2008 to 2032 should be identified and put forward.</p>			
DP716	Mrs Stephanie Steedman	Lady Sheila Butlin		Map .1	Proposals Map	Objecting	Request for Reconsideration -Island Plan Review - Old Garden,Blair Adam House, Les Chenolles, St John KEPlanning has been instructed by the owners of the above site to request your reconsideration of the decision not to include it as suitable for the construction of new development within the new		Reject	Site does not comply with spatial strategy and does not meet with planning Minister's criteria for protecting green fields and open spaces. This includes the extension of the built-up area	The Minister is not minded to amend the draft Plan

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							<p>The Jersey Island Plan. A map showing the location of the site is included as Figure 1. The request for consideration dated 5th August 2008 and submitted as part of the Island Plan Review, suggested that the site is suitable for rezoning to allow a limited amount of new housing to be built. The number that was suggested was indicative and the owners of the site have requested that the principle of new residential development only, is considered as part of this appeal. It was proposed in the original submission that allowing the site to be developed for residential purposes offers significant advantages for the local area and results in very little harm to the character of the Island: The site is not open, nor does it involve agricultural land. Building on this site will be seen within the context of the buildings of the surrounding building group. Building on this site makes the best use of the remnant of an estate which character has been changed beyond recognition. It is hard to see what harm could result from allowing building on this area. Two large and prominent conifer hedges are removed and are replaced with hedges comprising native species. The replacement of two large leylandii hedges with hedges and trees comprising native species, improves the opportunity for habitats for native species to be created at the site. The development of the site does not result in the need for new infrastructure. On the basis of the arguments put forward, the Minister is respectfully requested to reconsider the decision not to include the site at Blair Adam House as suitable for residential development. The site could either be included within the proposed Built-Up Area of the new plan; or, parameters could be set, clarifying that sites such as this, are suitable for residential development under the aims and principles set out in the new plan. One way of doing this could be achieved by expanding the definition of Brownfield sites to include sites such as this which are appropriate to redevelop, taking into account local context and considerations. Thank-you for taking the time to consider this representation and please do not hesitate to contact KEPlanning if there are any queries or points which require clarification.</p>			boundary, into the countryside, to allow for smaller-scale incremental development opportunities. The Plan makes it clear that throughout the plan period, sufficient land is available for the provision of Category B homes within the existing built up area. There are, therefore, considered to be no grounds to identify other sources of supply to meet housing needs, including the release of additional greenfield land.	
DP717		Mr Kenneth Renouard		Map .1	Proposals Map	Neither	<p>The proposed policy for redundant greenhouse sites is currently rather vague. As the glasshouse industries are in decline, I believe there should be more emphasis and incentives to encourage the redevelopment of those sites. I personally own two redundant greenhouses sites in the Boulivot &amp; lounville area. I have spoken to potential developers who have indicated that they would be</p>		reject	<p>The Spatial Strategy sets out a desire to protect the Island's countryside and prevent the further loss of greenfield land to development. This includes the redefinition, and extension of the built-up area boundary into the countryside to provide smaller-</p>	<p>The Minister is not minded to amend the draft Plan</p>

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							interested in working with me. I have also spoken with many of our neighbours and the consensus has been that they would all prefer to see a sympathetic residential development in the place of the redundant glasshouses, which are unsightly and currently beyond economic repair. Therefore, I would like to put forward my above mentioned two sites for re-zoning for residential development. The sites are Rainbow Nurseries on le Boulivot de Haut and on Rue de Tapon. I know of similar sites throughout the island, and believe that many of these could also be re-zoned to the benefit of the whole island.			scale incremental development opportunities. In addition the plan makes it clear that there is sufficient land is available for the provision of Category B homes within the existing built up area, therefore there is no need to release additional greenfield land for development. Any development proposals put forward within in this location need to be considered in relation to their potential impact upon the character of the area. The countryside character appraisals evaluation of the land is that it is 'Interior Agricultural Land' and therefore the application of the policy regime imposed by Policy NE7 is considered to be appropriate. Whilst there is a presumption against the redevelopment of redundant and derelict glasshouses for other uses unrelated to agriculture; in exceptional circumstances, Policy ERE7, Derelict and Redundant Glasshouses, permits minimal non-agricultural development in order to ensure demonstrable environmental improvement of the site by the removal of the glasshouses and any contaminated material, the reduction in the area of buildings, and the repair to the landscape.	
DP720		Mr John Payn		Map .1	Proposals Map	Neither	Further to my recent conversation with Mr Roger Corfield, please find my submissions regarding Field No. 803, known as Clos Fondant, Rue des Vignes, St Peter. This field is situated directly east of St Peter's Garden Centre and part of the field is currently used as an unofficial overspill car park. Mrs Elizabeth Ashworth of Planning & Environment has assured me that the ongoing application for car parking will be favourably looked upon. I am writing to request that t he entire Field No. 803 be included in the New Island Plan as a designated plot for building either housing or commercial development. I submit that the field is very difficult to work and situated between housing and St Peter's Garden Centre. There are houses to the east and south of the field. The houses to the east are new buildings and ongoing developments. I would be pleased to		Reject	Site does not comply with spatial strategy and does not meet with planning Minister's criteria for protecting green fields and open spaces. This includes the redefinition and extension of the built-up area boundary, into the countryside, to allow for smaller-scale incremental development opportunities. The Plan makes it clear that throughout the plan period, sufficient land is available for the provision of Category B homes within the existing built up area. There are, therefore, considered to be no grounds to identify other sources of supply	The Minister is not minded to amend the draft Plan



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							discuss this with you when you return from vacation.			to meet housing needs, including the release of additional greenfield land.	
DP721		Alison Le Cornu		Map .1	Proposals Map	Objecting	Field 573, Grouville I am writing you as a joint owner of the above-named field in Grouville in light of the recent publication of the draft Island Plan, in which it has been categorised within the Green Zone. We 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 of the Island Plan.	I and the other members of my family who jointly own the field (all of whom are resident in Jersey) would like to request that this field be considered for re-categorisation. We understand that fields within the Green Zone are not eligible for development. As we are keenly aware of the shortage of affordable accommodation as well as accommodation for Jersey's aging population, we would like to be in a position to apply to the Planning and Environment Department to develop the field at some point in the not-too-distant future. If it were possible to categorise the field in the Island Plan so that this would be a real possibility we think it would be of real benefit both to the Parish of Grouville and to the Island as a whole. The field has a one-storey construction on it, which is divided into two main sections each of which is subdivided into two and which has a total surface area of approximately 350 to 400 square feet. In the past it was used as living accommodation by French labourers. More recently it has been used by a local farmer to store farming equipment and straw or hay, with the rest of the field being used to graze horses. The building is not appropriate housing for modern life: it has no toilet or washing facilities, no kitchen or clearly designated uses for the individual spaces, although local people who remember it being inhabited say it used to be reasonably well equipped; it is constructed of prefabricated slabs and wood, with a corrugated iron roof; it is now in a very poor state of repair and would need extensive redevelopment work done on it were it to be made habitable. The remainder of the field has always, since it has been in the possession of our family (now at least three generations), been used either for grazing horses or it has been left fallow. To our knowledge, and within our memory, it has not been used for agricultural purposes. The field backs onto a small development of seven houses which were built at the end of the 1980s as part of the newly-constructed Le Clos Mallet. We think that a small section of Field 573 may have been used as part of the development of Le Clos Mallet, which was undertaken by our family in conjunction with North Jersey Construction. It is opposite an individual, occupied, house on the other side of La Rue du Puits Mahaut. The position of both these areas of housing means that the development of Field 573 would not encroach	Reject	The does not comply with spatial strategy and does not meet with planning Minister's criteria for protecting green fields and open spaces. The Plan makes it clear that throughout the plan period, provided all of the policies are adopted, sufficient land is available for the provision of Category A homes. There are, therefore, considered to be no grounds for the release of additional greenfield land.	The Minister is not minded to amend the draft Plan

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								significantly into the surrounding Green Zone, as we demonstrate on the attached digimap plan.			
DP759		Paul Harding	The Association of Jersey Architects	Map .1	Proposals Map	Neither	AJA Members appreciate the difficult task facing the Planning Department in balancing the competing demands and needs of the Island that can be summarised as - Provision of Housing for residents; Provision of Social, Commerce and Recreational facilities; Protection of the Environment; Protection of the Island's Heritage; and importantly flexibility to accommodate changes in the future circumstances of the Island. Given Jersey's finite land area every square metre is precious and land use presents complex decisions about how Jersey will progress in the future - with the Island Plan setting the framework ? and the AJA considers there are many commendable aspects of the 2009 Draft Island Plan. However there are some major issues and defects that, as we have set out above, need reconsideration. The overall combined thrust and effect of the Policies is unreasonably anti-development, against the Island's demonstrable need to, build ? particularly new housing. Contracting the Built-Up Area by about 113 acres (the summary section on Built-Up area boundary changes needs clarification) while seeking to provide an additional 4,600 homes over the Plan period is doomed to failure. This is unsustainable and fails to learn from previous experience - we have been here before. The Built-Up area deserves consolidation and lateral thinking rather than reduction. There is a need to rethink substantive parts, but not most, of the 2009 Draft Island Plan. We hope the final re-worked Plan will be much more visionary (especially about providing Housing) - creative and liberating rather than restrictive. As the 2009 Draft Plan stands at present commerce will be handicapped and housing provision stifled over the next 10 years. The AJA sincerely hopes this does not occur and implores you to reconsider the approach currently within the 2009 Draft Island Plan and arrange re-drafting of the sections we have highlighted.		comments noted	With specific regard to the loss of 113 acres of built up area, this includes all of the protected open space, such as the parks, playing fields, etc that is within in the built up area. Therefore, these areas, even under the previous plan would not be able to be developed and so there is therefore not a net loss of 113 acres of developable land through the re-zoning changes of the draft Plan.	Noted by the Minister
DP762		A H Harris		Map .1	Proposals Map	Supporting	St. Mary - Field 498 should not be altered as it is a green field coming up to the skirts of a 13th Century Church, and that setting should be maintained. I support Field 498 being protected open space. The cemetery and the amenity land in front of the Old Rectory also form part of this setting.		Noted	Noted	The Minister notes the support for the designation of F498 and land around the Church as protected open space
DP763		A H Harris		Map .1	Proposals Map	Neither	St. Mary - Field 502 - I support this being designated as Green Zone, but would also like to ensure that it		Reject	Field 502 falls outside of the Built Up Area and is designated Green	The Minister is not minded to

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							is a protected open space. I hope this zoning actually means that the extension of domestic curtilages and gardens will not be allowed. Field 502 is agricultural land, and any attempt to build upon it or convert it to domestic garden would affect the setting of La Plaisance, a designated SSI, and should be roundly opposed. Important indigenous trees in the area should be protected.			Zone, the field is afforded a high level of protection, accordingly therefore the additional zoning of Protected Open space is unnecessary.	amend the draft Plan
DP764		A H Harris		Map .1	Proposals Map	Supporting	St. Clement - the coast road going eastwards to Le Hocq opens out at that point to magnificent views of the beach, inter-tidal zone and towers and is one of the finest views in the Island. We are all entitled to this view as we pass by! No building should be allowed in such areas.		Noted	This area along coast road through St Clements and into Grouville is designate as Shoreline Zone. Development proposals within this zone that obstruct public views to the foreshore and sea will not be permitted.	The Minister notes the support for the designation of the coast road along St Clements as Shoreline Zone.
DP768		P Le Saux		Map .1	Proposals Map	Objecting	All headlands should be given National Park Status the headlands must be preserved at all costs and extended into Plan 2009 Green Zone as far as possible the Corbiere headland should have a northern boundary line extending Mont Sohier/ Le Mont Arthur. The Noirmont headland should have a northern boundary line extending La Pulente Hill/La Ruelle Sergente/La Blanch Charriere. Northern Headlands should have a southern boundary as defined on the 2002 Plan by the Green Zone.	I think an Open Space/Bufferzone is required to promote the aims of the Coastal National Park Status and form a buffer and bigger corridor for natural beauty and wildlife to succeed. It also gives more protection to headlands, Agricultural Land, Wetland, Marshes, Water Resources, Biodiversity, etc. Building these silly estates in places of Natural Beauty does more harm than good with the introduction of cats and dogs, and pollution. The outcome is nature is being forced out and nesting sites destroyed. People need large open space to get away from it all - wildlife need large open space to mark their territories and their hunting areas and keep away from creeping domestication and predators. What is the point of going for a quiet walk along a coastal path or across a headland when you have got housing estates and eyesores a few feet away. I think we have got to protect our large open spaces now whilst we have still got a chance. Sadly it is too late for the Noirmont and Corbiere headlands but it is not too late to try and salvage what is left of these headlands.	Reject	The definition of the Coastal National Park is based on an objective assessment of the landscape quality and character of the Island, as set out in the Countryside Character Appraisal, and to embrace wider areas as proposed, has no evidential basis in terms of landscape character and quality.	The Minister is not minded to amend the draft Plan
DP778	Mr Michael Stein	Mr Michael Stein	MSPlanning Ltd	Map .1	Proposals Map	Objecting	Caesarean Tennis Club, Les Grand Vaux, St Helier, JE2 4NA Retain Site as Built Up Area in Draft Island Plan	I write in connection with the above site which is presently zoned as Built Up Area in the island Plan 2002. You mayor may not be aware, but the club is considering re-locating to another site because the existing premises at Grand Vaux are no longer appropriate for a club with a growing membership. Also, because its existing facilities, especially the dome (the indoor tennis facility), are coming to the end of their useful life, re-investment in these costly replacement facilities would not make sense if it were to succeed in relocating to another site. Indeed, an in-principle application to develop the site for residential purposes is currently being kept in abeyance	Reject	The sports facilities provided by the Caesarean Tennis Club make a valuable contribution to sport, leisure and recreation in the Island and, accordingly, warrant protection under the policy regime provided by Policy SCO4. The aspirations of the club to improve its facilities are to be welcomed and would be facilitated by Policy SCO5. Likewise, SCO4 would not preclude the redevelopment of the existing facility, subject to the	The Minister is not minded to amend the draft Plan

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								because Policy TR4 presumes against the loss of recreational resources and, therefore, permission cannot be granted until permission has been granted for its re-location to another site. We are therefore pleased to see that the site is still proposed to be zoned as Built Up Area in the Draft Island Plan, albeit following correspondence with Mr Pilley, Assistant Director of Policy & Projects, he indicated in an e-mail to me that " we will consider this matter with in the context of the Draft Island Plan and consider an amendment to address this matter. " By this, he means proposing to re-zone it as Open Space. However, if this occurs, it will be counterproductive as it will make it much more difficult for the club to progress its plans to re-locate and we will continue to be in the same position as we are in now because the lack of a permit for its existing site effectively prevents it from progressing plans for the alternative site with any degree of confidence or certainty and which, ironically, therefore places the wellbeing of the club in jeopardy because of the inadequacy of the exiting site. Moreover, we are aware that the Draft Island Plan aims to prevent new development on green field sites and seeks to direct most new development into the town of St Helier. Our view, however, is that the town of St Helier will fail to deliver the yield of residential units which has been predicted in the Draft Island Plan for the reasons given in Appendix 1. This, therefore, makes it even more important that sites such as this site at Grand Vaux are not constrained from being able to yield residential developments that will help to address the shortfall of 4000 homes needed over the Plan period. Indeed, in our initial discussions with the planners, this was regarded as an ideal site for residential development. However, if the Caesarean's site at Grand Vaux is re-zoned as Open Space, we will find ourselves in the same situation we found ourselves in now, and the opportunity of re-locating to a larger site, providing improved and modern facilities will be lost, to the detriment of the club and the island. I would therefore be grateful if you would refer this reasoned request to the Planning Inspector so we might be able to address this issue at his Examination in Public.		tests set out in the policy.	
DP779	Mr Michael Stein	Mr Michael Stein	MSPlanning Ltd	Map .1	Proposals Map	Objecting	Field 530A, Princes Tower Road, St Saviour, Re-Zone into Built Up Area	I write in response to the Draft Island Plan White Paper in connection with the above site which I consider justifies being re-zoned into Built Up Area (as a natural extension to the Town of St Helier), as presently the site is zoned as a Countryside Zone (or Green Zone in the White Paper) which	Reject	Site does not comply with spatial strategy and does not meet with planning Minister's criteria for protecting green fields and open spaces. This includes the redefinition and extension of the	The Minister is not minded to amend the draft Plan

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								precludes any new residential development taking place. This represents a missed opportunity to provide an holistic residential scheme in harmony with the redevelopment of the Jersey Dairy site (which is in the Built Up Area) which it adjoins, that is on the edge of the Town of St Helier and which, because of its site characteristics, would be capable of accommodating more development without being harmful to the character of the area.		built-up area boundary, into the countryside, to allow for smaller-scale incremental development opportunities. The Plan makes it clear that throughout the plan period, sufficient land is available for the provision of Category B homes within the existing built up area. There are, therefore, considered to be no grounds to identify other sources of supply to meet housing needs, including the release of additional greenfield land.	
DP780	Mr Michael Stein	Mr Michael Stein	MSPlanning Ltd	Map .1	Proposals Map	Objecting	Field 669, La Rue des Grantez, St Ouen, Re-Zone for Residential Purposes	I write further to the White Paper produced as part of the current Draft Island Plan Review. Notwithstanding that the above site is zoned as Green Zone on the Draft Proposals Map, the attached submission sets out a reasoned case why it would be reasonable and appropriate to re-zone the site as Built Up Area so that it creates an opportunity to provide new Category B Housing to help satisfy the demand for 4000 homes over the lifespan of the new Island Plan. I would therefore be grateful if you would refer this case to the Independent Inspector for consideration at his Examination in Public.	Reject	The Countryside Character Appraisal's evaluation is that the overriding local character of the area is 'Interior Agricultural Land' and not a Built Up area. This designation remains consistent with the 2002 Island Plan Island plan designation of the land as Green Zone. Designating this built up area would contradict the established policy. The Spatial Strategy states that there is a strong desire to protect the Island's countryside, prevent the further loss of greenfield land to development, and the redefinition and extension of the built-up area boundary. Any development proposals put forward within in this location need to be considered in relation to their potential impact upon the character of the area. The application of the policy regime imposed by Policy NE7 is considered to be appropriate given the Countryside Character Appraisal evaluation of local character. The Spatial Strategy states that there is a strong desire to protect the Island's countryside, prevent the further loss of greenfield land to development, and the redefinition and extension of the built-up area boundary. Any development proposals put forward within in this location need to be considered in relation	The Minister is not minded to amend the draft Plan



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										to their potential impact upon the character of the area. The application of the policy regime imposed by Policy NE7 is considered to be appropriate given the Countryside Character Appraisal evaluation of local character.	
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>	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.
DP792	Mr Michael Stein	Mr Michael Stein	MSPlanning Ltd	Map .1	Proposals Map	Objecting	Area of Wasteland to north of Field 681, La Rue de la Bachauderie, St Saviour Re-Zone Land into Built Up Area	<p>I write in response to the Draft Island Plan White Paper in connection with the above site which (together with adjoining existing development) I consider justifies being re-zoned into Built Up Area (as a natural extension to the existing Urban Settlement), as presently the site is zoned as Countryside Zone (or as Green Zone in the White</p>	Reject	<p>Site does not comply with spatial strategy and does not meet with planning Minister's criteria for protecting green fields and open spaces. This includes the redefinition and extension of the built-up area boundary, into the</p>	<p>The Minister is not minded to amend the draft Plan</p>

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								Paper) which precludes any new residential development taking place. I would refer you and the Inspector to the Planning Statement I submitted to you on 23rd September 2009 and which sets out a comprehensive and reasoned case for the re-zoning of this land into Built Up Area (see attached). This represents a missed opportunity to provide additional residential development on infill sites such as this which may, because of site characteristics, be capable of accommodating more development without being harmful to the character of the area. The case has however been strengthened by virtue of the fact that the recently developed Category A Housing site to the north and west is proposed to be re-zoned as Built Up Area.		countryside, to allow for smaller-scale incremental development opportunities. The Plan makes it clear that throughout the plan period, sufficient land is available for the provision of Category B homes within the existing built up area. There are, therefore, considered to be no grounds to identify other sources of supply to meet housing needs, including the release of additional greenfield land.	
DP793	Mr Michael Stein	Mr Michael Stein	MSPlanning Ltd	Map .1	Proposals Map	Objecting	Bienvenue Farm, La Grande Route de St. Laurent, St. Lawrence Re-Zone land into the Built-Up Area	I write in response to the Draft Island Plan White Paper and to the proposal to re-zone the above site into the Green Zone and the adjacent land as a Warehousing/industrial site as an extension to the existing Thistlegrove Industrial Estate. Because Beinvenue Farm is already developed land adjacent to a primary road and served by the public foul sewer, and is surrounded by development including residential uses, it is an ideal candidate for rezoning. The re-zoning would enable the development of much needed family housing on land which will not be viable for commercial agricultural and critically, also protect the amenity of the existing residential property Thistlegrove against the possible future extension of the Industrial Zone onto this land. 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.	Reject	Site does not comply with spatial strategy and does not meet with planning Minister's criteria for protecting green fields and open spaces. This includes the redefinition and extension of the built-up area boundary, into the countryside, to allow for smaller-scale incremental development opportunities. The Plan makes it clear that throughout the plan period, sufficient land is available for the provision of Category B homes within the existing built up area. There are, therefore, considered to be no grounds to identify other sources of supply to meet housing needs, including the release of additional greenfield land. The proposed green zone for this site would provide better protection to the property Thistlegrove from any potential further extensions to the light industrial area or indeed other residential development.	The Minister is not minded to amend the draft Plan
DP794	Mr Michael Stein	Mr Michael Stein	MSPlanning Ltd	Map .1	Proposals Map	Objecting	Fields 1551 & 1552, Westmount Road, St Helier Re-Zone land for Residential Development.	I write in response to the Draft Island Plan White Paper in connection with the above site which I consider justifies being re-zoned into Built Up Area (as a natural extension to the Town of St Helier), as presently the site is zoned as a Site for Further Consideration for Category A Housing for which an application is presently submitted (or Green Zone in the White Paper which precludes any new residential development taking place). I would refer you and the Inspector to the Planning Statement I submitted to you on 17th September	Reject	Site does not comply with spatial strategy and does not meet with planning Minister's criteria for protecting green fields and open spaces. This includes the redefinition and extension of the built-up area boundary, into the countryside, to allow for smaller-scale incremental development opportunities. The Plan makes it clear that throughout the plan	The Minister is not minded to amend the draft Plan

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								2009 and which sets out a comprehensive and reasoned case for the re-zoning of this land into Built Up Area.		period, sufficient land is available for the provision of Category B homes within the existing built up area. There are, therefore, considered to be no grounds to identify other sources of supply to meet housing needs, including the release of additional greenfield land.	
DP795	Mr Michael Stein	Mr Michael Stein	MSPlanning Ltd	Map .1	Proposals Map	Objecting	Houguemont, La Rue D'Aval, St Martin, JE3 6ER Re-Zone Land to Built Up Area	I write in response to the Draft Island Plan White Paper in connection with the above site which (together with adjoining existing development) I consider justifies being re-zoned into Built Up Area (as a natural extension to the existing Small Built Up Area of Teighmore Park, Grouville), as presently the site is zoned as Countryside Zone (or as Green Zone in the White Paper) which precludes any new residential development taking place. I would refer you and the Inspector to the Planning Statement I submitted to you on 9th September 2009 and which sets out a comprehensive and reasoned case for the re-zoning of this land into Built Up Area (see attached).	Reject	Site does not comply with spatial strategy and does not meet with planning Minister's criteria for protecting green fields and open spaces. This includes the extension of the built-up area boundary, into the countryside, to allow for smaller-scale incremental development opportunities.	The Minister is not minded to amend the draft Plan
DP797	Mr Michael Stein	Mr Michael Stein	MSPlanning Ltd	Map .1	Proposals Map	Neither	Longueville Nurseries, New York Lane, St. Saviour Re-Zone Retail Site for Category A Housing	I write in response to the Draft Island Plan White Paper and to the proposal to re-zone half of the above site for Category A Housing. This submission supports the Planning Minister's proposal to re-zone half the site (Policy H2 (4)), for Category A Housing but also advises re-zoning of the remainder of the site to the north for the same purpose to ensure the efficient use of already developed land. 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 a sustainable site given its location on the edge of the Main Urban Settlement, and its proximity to local shops and services. We are therefore suggesting the removal of the proposal to return of half the site to pasture or woodland to enable much needed Category A Housing which would also enable the remediation of previous development on the site which has included the in-filling of this brownfield site with demolition material. 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.	Support for zoning Longueville Nurseries for Category A housing purposes noted. Extending the development site north, rejected.	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	Minister minded to remove this site from the Plan

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										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.	
DP798	Mr Michael Stein	Mr Michael Stein	MSPlanning Ltd	Map .1	Proposals Map	Objecting	CTV Site, La Pouquelaye, St Helier Maintain site as part of the Built-Up Area	I write in response to the Draft Island Plan White Paper and to the proposal to maintain the CTV site within the Built-Up Area. Because, the character of the site is dominated by the existing commercial building, car parking and forms part of a continuous area of developed land that spreads out from central St. Helier it is entirely appropriate that the site should be maintained within the Built-Up Area. 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.	Noted and supported	The site is zoned as built up area under the revised draft proposals map and will be subject to the new affordable housing policy (H3).	Noted by Minister
DP799		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. There is a need to amend the draft Plan to state, at 7.53, 3rd bullet, that: 'La Collette 2 coastal park: the planning framework for the use of land at the La Collette 2 reclamation facility envisages that provision of a significant area of open space at the completion of the reclamation activity. Whilst this space is	The Minister is minded to amend the draft Plan

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										unlikely to be publicly accessible, on account of its location within the safety zones for adjacent hazardous installations, it will provide an important visual buffer and screen to the industrial uses and buildings at La Collette 2.'	
DP800		Managing Director Carlo Riva Riva Architects Ltd		Map .1	Proposals Map	Objecting	Re-zone land forming part of the Countryside Zone and identified as H3-10 in the 2002 Island Plan, and which is proposed to become Green Zone in the Draft 2009 Island Plan into a Category A Housing Site.	PARTICULARS ASSOCIATED WITH FIELDS 888 +890 Areas The two fields are not commercially used for agriculture. They ceased being cultivated approximately 15 years ago. The topography of the fields are generally level. There is no reason to assume that there should be any land contamination issues. The verges and vegetation which currently enclose the fields make a positive contribution to their character and should be sought to be retained and enhanced. Such measures would increase environmental connectivity and ensure the presence of historical continuity to the site. Field888 - approximately 2,790m' (1 .55 verges) Field 890- approximately 2,016m' (1.12 verges) Approximate Total 4,806m' (1.19 acres 2.67 verges) Densities on such out of town sites can vary between 10-15 dwellings per acre. Hence the development yield could be: 12-17 units The Planning Department records suggest a potential yield of 17 homes, however, the enclosed sketch proposals illustrate a potential yield of 14 N° 3 bedroom dwellings. Given the site constraints and increased housing standards, this appears a more realistic figure. All mains services are available. Field 890 may currently be accessed through the adjoining property to its West (Mon Desir). which itself is accessed through St Peters Ironworks. This is not ideal for redevelopment purposes. and so access would be through Field 888. which has a direct, single vehicular access to La Rue Cappelain. Adequate visibility splays may be achieved onto this Parish road, although improvements may be gained by agreement with the owners of the property to the North (Villa Elmar). Site Context - The area around La Rue Cappelain has experienced a tangible amount Built-Environment of development during the course of the current Island Plan, as sites become consolidated and redeveloped. No disenable architectural character could be described as typifying the area, although recent developments tend to be steering the area towards a 'contemporary' interpretation of traditional forms using traditional materials. The recently approved proposals for the Avis Headquarters site to the	Reject	The proposed site is undeveloped and therefore does not meet the revised spatial strategy of the 2009 plan and the Minister's criteria for protecting green fields and open spaces. A sufficient supply of category A homes has been identified by the draft plan from brownfield sites.	The Minister is not minded to amend the draft Plan



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								<p>North of Field 888 is certainly an example of this form of development. Public Consultation It is understood that 'informal' support has been obtained from the Parish of St Peter Connétable regarding the proposed redevelopment of the fields in question. The owners of certain neighbouring properties/premises around the fields have also expressed their support for the development proposals. Northern boundary. This is marked along its entire length, by the 'Avis Headquarters' site, the owners of which are potential development partners to the site in question. Western boundary. This boundary is delineated by two properties ' Alfriston Lodge' and 'Mon Desir', the property owned by the proprietors of Field 890. Southern boundary. Field 890 bounds with parts of Fields 891 and 892. Eastern boundary. The rear gardens to three dwellings mark this boundary. Development Programme It would be advantageous to the neighbouring environment to consider the development of Fields 888 and 890, and the redevelopment of the 'Avis Headquarters' site as an entirety. The benefits would be to reduce the extent of the development period, and to reduce development costs. CASE FOR RE-ZONING H3 Sites Both H3 and H4 sites were zoned as potential 'Need' housing developments for the second half of the duration of the 2002 Island Plan. Subject to the identification of the Island's housing requirements, such sites would be carefully assessed to determine the contribution they might be able to make in reducing the housing need shortfall. While the majority of the sites designated by the 2002 Island Plan have been successfully developed in recent years, this is not the case for all. As the September 2009 (Draft) Jersey Island Plan clearly indicates, there is a need to provide new homes. In fact the document suggests 4,000 over its 10-year validity period . Notwithstanding, the comment made in Clause 6.33 of the Draft 2009 Plan document, it is contended that the H3-10 does have a material contribution to make in meeting Island-wide housing needs. This proposal further challenges the statement made in Clause 6.76 that: 'These (H3 &amp; H4 sites) have all been systematically evaluated to determine those that could help appropriately meet the Island' identified housing need'. The proposed Spatial Strategy as defined in the Draft 2009 Island Plan Strategy is clearly ambitious, as it 'seeks to concentrate new development over the Plan period in the Island's</p>			

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								<p>Built-Up Area, and particularly St Helier, is dependant upon the release of land and the realisation of development opportunities in the Island's urban areas'. Clause 6.58 goes on to suggest that there are risks associated with meeting this objective, for as Clause 6.81 confirms 'that unless higher density development yields are generally realised on all development sites.....it will not be possible to meet all the identified needs for housing without zoning additional housing sites'. We contend that Fields 888 and 890 may help make a small contribution to reducing the Spatial Strategy gamble. Parish Vibrancy Although the Draft 2009 Plan does not recognise the Parish of St Peter as being a village settlement in need of extra dwellings to increase its vibrancy, the Parish itself has expressed some support of the proposed redevelopment of Fields 888 and 890. The positive contribution that the development of up to 14 dwellings to the parish community should not be underestimated. Travel The proposed site lies enclose proximity to one of the Island's main bus routes. It further benefits from good vehicular 'permeability' in that it has a variety of options of road links to Town, Red Houses and other parts of the Islands. QUALITY OF DEVELOPMENT Efficient Site Even the most cursory of site assessments confirms that the fields may be efficiently developed in a manner which maximises yield to communal circulation areas. The proposed dwellings may also be accessed in such a way that the private amenity areas will benefit from good, sunny aspects. Mitigation measures will need to be introduced to minimise the impact of the development onto adjoining properties to the East. This will need to guide site layout and the proposed landscaping designs. There is no reason to assume that this would not be successful however. Design Precedent The proximity and the extent of the proposed 'Avis Headquarters' site will clearly serve as a potential design generator for the development of Fields 888 and 890. The quality of this site is implicit in the fact that it received a planning consent under the terms of current Planning Policy and Guidance. SERVICE CHECKS All service checks associated with the site have been carried out. The service providers have been notified of the potential housing yield on the site and have responded accordingly. Jersey Telecoms On 15 February 2010, Jersey Telecoms commented as follows: '... At this present moment in time we do not foresee any abnormal</p>			

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								<p>circumstances to accommodate your proposed development....' Transport &amp; On 9 February 2010, Transport &amp; Technical Services Department Technical Services commented as follows: 'A public foul sewer is available in La Rue Cappelain to the North West that has the capacity for the increase in flow from the proposals'. It is acknowledged that a communal pumping chamber may be required to serve the proposed development. Surface water will need to be disposed of within the site by the use of permeable paving and soakaways'. Jersey Water 9 February 2010, Jersey Water commented as follows: .... Jersey Water has an 8 cast iron water main in La Rue de Cappelain, running past the proposed entrance to the site. This will be more than sufficient to supply the development.. '. CONCLUSION The above and enclosures have endeavoured to establish the case in support for the re-zoning of fields 888 and 890. The Need for family Category A Housing is clearly advocated in the States Strategic Plan 2009 - 2014. There is no current economic value to the site. The proposed redevelopment plans have been given good parochial and adjacent neighbour support. The development design could potentially contribute positively to the character of the area and help to clearly delineate the difference between the built up and adjoining rural areas. In essence. it is suggested that the development of this site will contribute to the greater Island community, and as such the proposal to re-zone should be supported.</p>			
DP801	Mr Michael Stein	Mr Michael Stein	MSPlanning Ltd	Map .1	Proposals Map	Objecting	Mont Matlhieu (Land at), Le Mont Matlhieu, St Ouen Case to Re-Zone into Built Up Area to enable Residential Development	<p>Notwithstanding that the above site is zoned as Green Zone on the Draft Proposals Map, the attached submission sets out a reasoned case why it would be reasonable and appropriate to re-zone the site as Built Up Area so that it creates an opportunity to provide new Category B Housing to help satisfy the demand for 4000 homes over the lifespan of the new Island Plan. I would therefore be grateful if you would refer this case to the Independent Inspector for consideration at his Examination in Public, This case seeks to have the area of established wasteland to the east of the existing cluster of development (see location map and aerial photo in Appendix 1) on the brow of Mont Matthieu re-zoned from Green Zone to Built Up Area to provide an appropriate opportunity for residential development that will help to meet the much publicised shortfall of both Category A and Category B Housing in the island. The site has been vacant wasteland for a number of decades, seemingly having been a residual piece of land left</p>	Reject	<p>The Countryside Character Appraisal's evaluation is that the overriding local character of the area is C3 St Ouen's Bay Escarpment. The Appraisals' assessment of this area is that it is distinctive and provides the backdrop to wide St Ouens coastal plain below, furthermore this is a very highly sensitive area and any development here is likely to have an adverse impact over a large area of the bay below. Therefore application of the Policy regime imposed Policy NE6, Coastal National Park is considered to be appropriate for determining development proposals given the character of the area. Development of the site fails the spatial strategy sets out</p>	<p>The Minister is not minded to amend the draft Plan</p>

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								over after the development of the residential development to the west that occurred in the 1960s. As it is serviced by some tracks (probably left over from the development of the land to the south - see photos in Appendix 2) it has been used for various unauthorised uses, including the parking of vehicles for the existing dwellings to the south west, unauthorised vehicle dumping and, even more concerning, there is evidence of the land being used for fly tipping. Although the owner has made repeated attempts to keep the land clear of all these unauthorised uses or activities, she has been unable to control this. Additional to this, there are parts of the land which have been overtaken by invasive brambles and bracken and which provide little or no ecological value, or landscape value.		the principle of preventing the further loss of greenfield land to development, and the redefinition and extension of the built-up area boundary into the countryside.	
DP803	Mr Michael Stein	Mr Michael Stein	MSPlanning Ltd	Map .1	Proposals Map	Objecting	Villa Devereux, La Route Orange, St Brelade Re-Zone Land into Built Up Area	I write in response to the Draft Island Plan White Paper in connection with the above site which (together with adjoining existing development) I consider justifies being re-zoned into Built Up Area (as a natural extension to the existing Urban Settlement), as presently the site is zoned as Countryside Zone (or as Green Zone in the White Paper) which precludes any new residential development taking place. I would refer you and the Inspector to the Planning Statement I submitted to you on 24th November and which sets out a comprehensive and reasoned case for the re-zoning of this land into Built Up Area. Basically, this represents a missed opportunity to provide additional residential development on infill sites such as this which may, because of site characteristics, be capable of accommodating more development without being harmful to the character of the area. Alternatively, the new Green Zone Policy needs to be re-drafted to enable such sites to be developed, as an exception to the presumption against development, to enable the provision of much needed Category B Housing.	Reject	Site does not comply with spatial strategy and does not meet with planning Minister's criteria for protecting green fields and open spaces. This includes the extension of the built-up area boundary, into the countryside, to allow for smaller-scale incremental development opportunities. In addition the northern boundary of the site forms one of the last remaining gaps in the built environment along La Route de Orange. Development of this gap would be detrimental to the character of the local area.	The Minister is not minded to amend the draft Plan
DP807		Mr Jeremy Harris		Map .1	Proposals Map	Objecting	Field 525, St. John - Field 525 was identified in the 2002 Island Plan as a 'site for further consideration for Category A Housing', and a copy of the relevant paragraph is given below (my emphasis)- Field 525, La Rue de la Mare Ballam, St. John 8.124. Field 525 is a large flat field of 1.9 acres (4.3 verges) in arable use on the south side of St John's Village. There is a modern housing development on the north side of the site and a boundary of mature trees on the south side. The site could provide approximately 14 homes as well as land (0.8 acres) for an extension to facilities at St John's Primary School. A pedestrian route could be achieved through the school site and		Noted, and minded to accept proposal to safeguard western part of the site for school playing field,	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	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

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							thereby to other village shops and services. Access for vehicles would be from La Rue de la Mare Ballam.' In late 2007 the ESC Department was invited to comment on a proposal that at least part of this field should be used 'to enable the expansion of educational facilities' at St. John 's School. Field 525 was being discussed at that time in the context of a proposal to sell off the Recreation Ground at St. John and to use the proceeds for the creation of similar facilities closer to the village centre. The matter was discussed with the head teacher at St. John's School, and a letter was subsequently sent by the ESC Minister to the Planning Minister which set out the department's position (copy attached as Appendix Four). St. John 's School has again been contacted by the ESC Department (in February 2010) as a consequence of the current public consultation on the draft Island Plan, and it has confirmed that it would strongly support the retention Field 525 , St. John, in the new Island Plan , i.e., on the basis that at least part of the field should be retained for educational purposes, e.g. for a playing field and/or for additional parking/dropping off space. The ESC Department also supports the view that part of Field 525 should be designated for educational/ community purposes. Taking into account the location of the school and playground, it would be more appropriate if the western part of the field were designated for this purpose, as this would be adjacent to the school premises.		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.	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. Provision of additional facilities for car parking and access arrangements is not justifiable and acceptable in the Green Zone on the basis of facilitating car use and the potential adverse impact on the countryside.	would be minded to support an amendment of the Plan. The Minister is not minded to accept proposal to safeguard land for the purposes of facilitating car-borne access to the site and additional car parking.
DP854		J.S Carney		Map .1	Proposals Map	Objecting	Garden of Cliff house to be removed from built up area and placed in green backdrop or green zone.	We write to you on behalf of the beneficial owners of Dolphin Cottage and The Porthole Guest House Hotel in the immediate vicinity of the above mentioned site/garden, your file reference P/2006/1103. We submit that the proposed ongoing 'White Zoning' of this part of the land under The (Draft) Jersey island Plan, September, 2009 is flawed and incorrect. We enclose a site plan in order to be absolutely clear as to the parameters of land at issue. We make this assertion upon the basis that 3 previous Planning (1 excellent architectural/engineering design and so on) application to build a detached unit upon the site have all been rejected latterly under Policy G2 of (i, ii, iv & vi), General Development considerations G3 (i, ii & iv), Quality of Design H8 (ii, iii, iv, vii & viii), Housing Development Within a Built Up Area and BE9 Conservation Areas of Jersey Island Plan 2002. Furthermore, the site is narrow and steeply sloping closely surrounded by other buildings, and only accessible for construction, and thereafter by a narrow lane with	Reject	The site is, as stated, "surrounded on all four sides" and clearly forms part of St Aubin's village urban area. It is therefore designated built up area. Development applications are concerned upon there merits, inappropriate proposals which do not satisfy plan policies will be refused permission.	The Minister is not minded to amend the draft Plan



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								<p>buildings close to its edge, many of them of considerable age. Due to the narrowness and steep grading to the site, there is no space on site for storage of materials and equipment during the construction. The site is also within a Potential Conservation area, and a Tourist Destination Area, reflecting the historic character and importance of the Island's recreational tourism and facilities. This site forms part of the elevated green backdrop area of St. Aubins behind the Bulwarks. Any construction being considered therefore, would need to be of such a scale and volume that the materials to be excavated and the length of disruptive construction process would have an unreasonably harmful impact upon amenities and residents, and the character of the area as a whole. The last development proposal therefore had been deemed to fail to satisfy the Department's Policy G2, (i, ii, vii, viii &amp; x) , General Development Considerations HB, (ii, iii &amp; iv) , Housing Development Within a Built Up Area and BE9 Conservation Areas of Jersey Island Plan 2002. The fact of the matter is that the site comprises geotechnically/historically an unstable hillside. The site is surrounded on all four sides by existing houses of mainly vernacular traditional architectural type size and appearance, which would be very sensitive to any vibration caused by excavation, underpinning or large scale groundworks, piling , and construction and so on. In order to be financially viable, any Unit upon the site has to be of a certain size , which is so large as to necessitate substantial excavation into the hillside, creating problems with access, protection of neighbouring properties, the road , removal of spoil and so on. Furthermore, the one way narrow access 7.5 tonne weight restricted road is steeply sloping , has no pavement at present, and any ingress/egress to the site presents several almost insurmountable vehicular/pedestrian safety problems. We would therefore seek a more sympathetic Zoning of this particular area of land which has been the subject of considerable concern and debate to the residents of St. Aubin recently and for many years during the consideration of the above mentioned Application, which fully tested the various parameters of the site, and was found to be unacceptable. Finally, should any aspect whatsoever herein require more detailed verification please do not hesitate to telephone our office in the first instance any weekday morning, since we tend to be on site with clients in the afternoon.</p>			

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DP855		Advocate Nigel Weston		Map .1	Proposals Map	Objecting	High Gorse , Field 1534, Tower Road, St Helier	I am writing in relation to the above-mentioned site, in response to the current consultation on the Draft Jersey Island Plan. I also refer to and rely on my letter and enclosures of 8 November 2008 to Senator Freddie Cohen (the "Proposal"), which included a full description of the site and its location. Also included were certain maps and diagrams, and a range of photographs from the air and various vantage points inside and outside the site. Copies were provided to the Minister and the Planning & Environment Department both at the time of writing and subsequently, but please let me know if any further copies are required. The Draft Island Plan gives rise to two major issues in relation to the site. These are as follows:- 1. it proposes re-zoning an important part of the site from white zone to green zone; and 2. it does not accommodate the application set out in the Proposal. For the purposes of the consultation process, kindly regard this letter as my formal objection to each of these. Both are dealt with in more detail below.	Reject	The site has been included within the green zone in accordance with the Minister's criteria for protecting open spaces and green fields. This includes restricting the extension of the built-up area boundary, into open fields and the countryside to allow for smaller-scale incremental development opportunities. In defining the extent of the Built up area boundary, consideration is given to development that has taken place. Not to land that is, or at any time in the past intended to be built upon. In this instance defining and extent of the built up area is highly apparent. There is a clear distinction between the developed land west of Field 1534, and the undeveloped land to the east. This includes the northern part of Field 1534. All proposals put forward before the adoption of the Draft 2009 Plan will be determined, duly and fairly, in accordance with the policies and principles of the 2002 Plan. The impact of planning policy on the value of the land is not a material consideration.	The Minister is not minded to amend the draft Plan
DP866		Mrs Jennifer Holley		Map .1	Proposals Map	Objecting	I write again on behalf of a large group of residents asking that field 641 be rezoned from Built-Up Area in the draft Island Plan to Green Zone. Since my letter to you of 16 November 2009 the last proposal for development of the field (P/2009/142I) was rejected by the Planning Applications Panel on 15 December 2009 with this decision confirmed by the Panel on 28 January 2010. The reason given for refusal of permission was as follows: "The proposed development would, by virtue of the introduction of a dwelling into an open and undeveloped parcel of land, result in the loss of prominent open land and would unreasonably affect 'the character and amenity of the area and unreasonably impact on the local environment by reason of visual intrusion, contrary to the provisions of Policies G2(i) G2(ii) and H8(ii) of the Jersey Island Plan, 2002. " We are grateful for this decision and believe that it gives a strong indication in favour of the rezoning of field 641. My last letter included signatures of 107 residents, mainly from neighbouring households, in		Minded to not amend the established boundary of the Built Up Area.	The site in question was zoned by the 2002 Island Plan as part of the St Peters village Built Up area. The thick hedgerow along the western boundary of the site provides a clear distinction between the Countryside Character Appraisals' evaluation of the land as forming part of the villages the built up area, not as part of interior agricultural land of the Western Plateau beyond this boundary. The site fits the spatial strategy preference for locating development within the built up area and not in open countryside and therefore minded to not amend the boundary of the established built up area.	The Minister is not minded to amend the draft Plan

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							support of the request for the field to be included in the Green Zone. Since then, wider support has been gained from another 142 individuals, whose signatures, names and addresses appear on the enclosed 13 pages of petition to the Minister for Planning and the Environment. Please add these documents to our previous representations to the Minister. We ask that a rezoning amendment to the draft Island Plan be recommended to the inspector appointed under the Planning and Building (Island Plan) (Jersey) Order 2009. Our group would be pleased to send one or more representatives to a hearing arranged by the inspector should further explanation be required.				
DP888		Mr John Way		Map .1	Proposals Map	Objecting	1. My dwelling La Maison du Long champ, La Route du Petit Port, St Brelade is currently in the Built Up Area. The building attached to the east of Maison du Long champ, which is the cottage was understood to be in the BUA too, however on the boundary of the Countryside Zone. On the proposals it is shown in the Countryside or new Green Zone?. For clarity, could this be changed to the Built Up Area? 2. The large building to the south of the cottage is currently in the countryside zone. Would this be able to be considered to go into the Built Up Area? It borders the road known as La Route du Petit Port and is west of our pond in field 398. This addition would be a sensible and continues addition to the Built Up Area. 3. The land directly to the north of La Maison du Long camp is Countryside Zone, currently going into the Green Zone. I would appreciate these boundaries being maintained as proposed as their is currently no outbuildings on this piece of land and I feel it would be a detrimental impact on La Maison du Long champ and other properties, should this piece of land be changed into the Built Up Area. The land in question is field B398, the most westerly part, bordering the boundary of Ocean View, Petit Port Close, owned by Mr and Mrs Alain Pinglaux.		Reject Built Up Area boundary extension s. Support for retaining Field 398 as Green Zone noted.	1 and 2: Site does not comply with spatial strategy and does not meet with planning Minister's criteria for protecting green fields and open spaces. This includes the extension of the built-up area boundary, into the countryside, to allow for smaller-scale incremental development opportunities. 3: Green Zone boundary support noted	The Minister is not minded to amend the draft Plan
DP890		James Ransom	Longueville Garden Centre	Map .1	Proposals Map	Objecting	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		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	Minister minded to support request to remove site from Plan.

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							(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.			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.	
DP892		Susan Brown		Map .1	Proposals Map	Supporting	SUBMISSION TO ISLAND PLAN CONSULTATION PROCESS IN RESPECT OF FIELD 263A I write on behalf of a group of five families who live in homes next to field 263A. In the last five years we have made previous submissions regarding this field which will be on file. As part of the new Island Plan consultation process we wish to make a submission urging the retention of this piece of land's current designation of Important Open Space.	There is a history of protection of this land from development dating back to the 1982. In that year the States' Assembly rejected a proposal to rezone the land for housing. A similar proposal in 1989 was withdrawn prior to debate. In 1987 the Island Plan designated the land part of the Sensitive Landscape Area in the restricted zone. This protected status was further upheld by a Planning Committee decision to refuse planning permission for a single dwelling in 1994. Finally in 2002 the Island Plan gave the land the protected status of Important Open Space which carries the highest presumption against development and should not be dispensed with other than for truly exceptional reasons. In 2004 the field's owner Mr McCarthy submitted a further planning application, at the invitation of the Committee. Permission was eventually refused by your decision as Minister in 2006. That decision resulted in Mr McCarthy appealing to the Royal Court and I have enclosed the written judgement of the case, dated March 2007. The Royal Court upheld the decision to deny	Support for zoning Field 263a as Protected Open Space noted, however minded to amend the draft Plan, at SCO1 and the Proposals Map, to support the further safeguarding of	The support for zoning Field 263A, Grouville as Protected Open Space is noted. Nevertheless the department is minded to accept proposals put forward by the Education Sport and Culture department to safeguard land additional land for educational purposes, where the evidence of need can be demonstrated. This includes Field 263a for the use by Grouville School. 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 requirement for additional open space at Grouville School can be justified,	The Minister notes the support for zoning Field 263a as Protected Open Space, however 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 of part of Field 263a, where there is justifiable evidence of need.

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								<p>planning permission and the judgement makes several points which are relevant to the current situation. In its introduction to the case the Royal Court judgement notes that "During negotiations with the Planning Department....the appellant offered to relinquish part of it (the field) for the use of the school if he were granted development permission for housing on the remaining part." In engaging in such negotiations, the judgement states "The procedures adopted by the Committee left a great deal to be desired. It confused its planning function with its desire to assist the acquisition of land for the benefit of Grouville school. This was not, as it erroneously determined, a "planning gain". It was not a planning consideration at all." (para 45) While the Royal Court was critical of the planning authorities it noted that "equally the appellant must bear some responsibility for making a suggestion which the Committee could not properly accept." (para 46) We are aware that Mr McCarthy has again been canvassing for support for this 'deal'. In its judgement the Royal Court reviewed the history of the field's protected status and noted that during 2002 the Property Services Department (then part of the Planning Department) began negotiations with Mr McCarthy for the acquisition of the whole field. This action was prompted by a Project brought to the States' Assembly by the Planning Committee in January 2002. (Project 188/2001, enclosed) The States' gave its approval for the purchase, compulsorily if necessary, of field 263A and its immediate neighbour field 263 for the future use of Grouville Primary School. That Project clearly made the case for acquiring the whole of both fields, stating that "this would take into account any possible future need for the school or changes in guidelines and is in accordance with good planning principles. The Committee believes that it would be short-sighted to rezone just the barest minimum space for the current number of pupils." The Project continued, "The Committee did consider an earlier suggestion to acquire only part of the two fields but rejected the notion because it would be a constraint on future development of the school for any reason. Too many of our schools already suffer in this respect." To imagine that this particular school will not need to expand in the medium-term seems implausible given the new housing developments already approved for this parish (with more to be considered) and the explicit policy drive to increase the island's overall population in the</p>	land for educational purposes of part of Field 263a, where there is justifiable evidence of need.	particularly when Field 263 has only recently been provided and when the school also has relatively extensive grounds and access to Field 304.	



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								<p>coming years. Grouville Primary School is bordered on three sides by existing buildings. Field 263A is the only piece of available land adjacent to the school which could accommodate its expansion. It would seem reckless at this time to jettison the existing policy of securing this land to meet the inevitable future needs of the school. Returning to the negotiations between the Property Services Department and Mr McCarthy in 2002, the field was valued at £310,000. It is worth noting that the adjoining field 263 was compulsorily purchased for £25,000 having been valued as agricultural land. It was made possible for Mr McCarthy's much smaller field to achieve such an inflated valuation by the mechanism of a Planning Committee decision in July 2002 which, extraordinarily, was unminuted. (para 8 Royal court judgement) In the absence of Planning Committee minutes it was stated in the affidavit of a Planning Department official that the Committee had decided that the protected status of the land was only in place in order to secure it for possible future use of the school and that the field might have been classed as being part of the 'built-up area' and thus the owner might have had a legitimate expectation of development being allowed had the Important Open Space designation not been in place. The history of the land as noted earlier suggests that this is not the case; decisions to defend this land from development have been made consistently since 1982, irrespective of the school's needs. The inflated value of field 263A made compulsory purchase unaffordable and Mr McCarthy's 'offer' regarding the school's acquisition of the lower part of the field came into play. In June 2005 the Planning Committee lodged a Project to remove the Important Open Space designation of field 263A in order to retrospectively legitimise its ultra vires decision to grant 'in principle' development permission. The Project was defeated by a substantial majority in the States' Assembly on June 28 2005 and the Committee therefore had no choice but to refuse planning permission; that decision was subsequently upheld by yourself as Minister in 2006. The Royal Court judgement of March 2007 concluded "It is hard to avoid the immediate conclusion that the history of this application is not a model of how planning procedures should be conducted." (para 20) It judged that the behind the scenes agreements reached between the Committee and Mr McCarthy denied the right of public consultation and were "a parody of due process." (para 45)</p>			

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								<p>Finally, as reported in the Royal Court judgement, in your refusal to allow the building of two houses on this field you found that "the resulting development would result in the loss of part of an area of Important Open Space and would unreasonably affect the character and amenity of the area." (Intro) This decision echoes the previous. Planning Committee decision of 1994 to refuse an application to build one house on the grounds that it would be "detrimental to the amenity of neighbours". It seems to us that the issue of loss of amenity has a history of being considered as a serious impediment to development and we trust that this consideration will continue to be respected. As a group of neighbours of the school and members of the Grouville community we are prepared to sacrifice some degree of our personal amenity for the benefit of our local school's future expansion. This is a world away from having that amenity taken away to allow one individual to profit from building two houses on a piece of land that has been consistently protected from development for the last twenty-eight years. In conclusion, we respectfully urge you as our elected representative to uphold the spirit of the 2002 Island Plan and its 1987 predecessor and maintain the protection against development of field 263A so that it remains a valued open space in our community and continues to be available for the future use of the local primary school. Yours sincerely Susan Brown On behalf of Jill and Mo Matthews Lynne Troy and Brian Troy James Silvester and Jackie George Eugene and Mandy O'Donnell John Hodge and Susan Brown</p>			
DP897		Mr Mike Waddington		Map .1	Proposals Map	Objecting	Field 1341, St Helier-Island Plan Inclusion Having met with you and Deputy Duhamel and our client on 30.12.2009 and recent meeting on site, we would like to submit the inclusion of this site for consideration under the new Island Plan.	<p>We think it could make excellent use of land currently not used, on the fringe of St Helier. Our proposal would be for an apartment scheme cut into the steeply sloping lower section of the site. This could provide: 1. Much needed residential accommodation without adversely affecting either agriculture or the green backdrop. 2. An opportunity to improve the green backdrop with a green roof balcony edged development and significant planting scheme of appropriate new trees. 3. A public walk/nature trail within the new copse. 4. Footpath to St Helier 5. A scheme that could set a new benchmark for environmental performance.</p>	Reject	<p>Site does not comply with spatial strategy and does not meet with planning Minister's criteria for protecting green fields and open spaces. This includes the redefinition and extension of the built-up area boundary, into the countryside, to allow for smaller-scale incremental development opportunities. The Plan makes it clear that throughout the plan period, sufficient land is available for the provision of Category B homes within the existing built up area. There are, therefore, considered to be no grounds to identify other sources of supply to meet housing needs, including</p>	The Minister is not minded to amend the draft Plan

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										the release of additional greenfield land. Development proposals to enhance the local environment and character of the area through appropriate landscaping and improved public access would be permitted under the policy regime imposed by Policy NE7.	
DP900		Mr Peter Troy	North Jersey Construction Ltd	Map .1	Proposals Map	Objecting	Field 155 Rue des Maltieres, Grouville This site is on the fringe of development at the rear of Grouville and is currently utilised as garden allotments . We suggest that the garden allotments, which are unsightly, could be relocated, and either housing or a hotel complex with conference facilities placed on the site.	We have never submitted plans for the site but have had discussions with the Chief Officer of Economic Development (Mike King) who has expressed support for a Hotel complex on the site, which would aid the tourism industry that has been in a state of decline for many years. The current Assistant Minister of Planning Deputy Duhamel has visited the site and recognises that it has potential, and of course we recognise that any development would have to proceed through the Planning process . We would be interested in an eco-friendly development cut into the site, which slope backwards to a quarry at the rear and would like to continue discussions in bringing forward development in the near future. Derek Mason, architect, has done some work with us on this site, the content of which now needs some revision, but we are keen to progress this site further. Attached is a location plan with the site highlighted.	Reject	The site is zoned as a 'Protected Open Space' and provides allotment space, a much sought after community use. Therefore the site does not comply with spatial strategy and does not meet with planning Minister's criteria for protecting green fields and open spaces. This includes the extension of the built-up area boundary, into the countryside, to allow for smaller-scale incremental development opportunities. The Plan makes it clear that throughout the plan period, sufficient land is available for the provision of Category B homes within the existing built up area. There are, therefore, considered to be no grounds to identify other sources of supply to meet housing needs, including the release of additional greenfield land.	The Minister is not minded to amend the draft Plan
DP901		Mr Peter Troy	North Jersey Construction Ltd	Map .1	Proposals Map	Objecting	Field 128 St. Clement and consenting neighbours Field 127 This site is at Samares St. Clement, and we own field 128 with the owners of field 127 having confirmed that they would consent to development of housing in a single development. Drawings for the site have previously been sent to Deputy Le Main by our architect Mr. Andrew Harvey, showing a SO/50 mix of sheltered housing and category B units.		Reject	Site does not comply with spatial strategy and does not meet with planning Minister's criteria for protecting green fields and open spaces. This includes the extension of the built-up area boundary, into the countryside, to allow for smaller-scale incremental development opportunities. The Plan makes it clear that throughout the plan period, sufficient land is available for the provision of Category B homes within the existing built up area. There are, therefore, considered to be no grounds to identify other sources of supply to meet housing needs, including the release of additional greenfield land.	The Minister is not minded to amend the draft Plan

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DP903		Mr Peter Troy	North Jersey Construction Ltd	Map .1	Proposals Map	Objecting	Field 1027 Beaumont. St. Peter A new gyratory could progress through the edge of field 1027 providing a bus stop area and access to a housing development on F1027. Mr Derek Mason has previously completed drawings for a gyratory system and Mr Andrew Harvey has previously completed drawings for a SO/50 mix of sheltered housing and category B units.	Beaumont traffic junction carries a considerable amount of traffic from the west and has excessive pollution levels . In the past it has been suggested that a gyratory system be created to improve traffic flow into St. Helier and reduce pollution build up. The site is close to shops and bus routes .	Reject	<p>1. The principle of highway improvements to the Beaumont/ Route de la Haule junction is identified by Policy TT14. As stated in the plan, simply improving the capacity at the junction would not alleviate congestion as capacity is constrained by the density of housing, the numbers of entrances and junctions, and pedestrian crossings between the junction and Bel Royal. A road construction solution would, therefore, involve not just increased capacity at Beaumont, but increased capacity on the road system through to Victoria Avenue. In turn, the increasing capacity in this area would subsequently put more demand on junctions nearer St Helier and unless those other junctions could cope with the increased arrival rate of vehicles, improvements to Beaumont would be of little benefit. For this reason it is important to undertake a detailed cost benefit analysis of all the options available at Beaumont, including the construction of a new gyratory system. 2. With regards to developing the site for homes, the site does not meet the spatial strategy and does not meet with planning Minister's criteria for protecting green fields and open spaces. This includes the redefinition and extension of the built-up area boundary, into the countryside, to allow for smaller-scale incremental development opportunities. The Plan identifies a sufficient supply of Category A homes and makes it clear that within the existing built up area boundary there is sufficient availability of land to supply the demand for Category B homes. Accordingly therefore, there are no grounds to identify other sources of supply to meet</p>	The Minister is not minded to amend the draft Plan

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										housing needs, including the release of additional greenfield land.	
DP951		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.
DP952		Deputy Philip Rondel	Parish of St John Working Party	Map .1	Proposals Map	Objecting	The car park and tennis courts to the north of the Recreation Centre field 674 - is currently designated in the DJIP 2009 as a Built Up Area. The Working Party supports its retention as a Built Up Area with a slight extension to accommodate an extension to the car park of the Recreation Centre and for a skate-board park.		Reject	The site occupies land zoned as 'Protected Open Space' within the 'Built Up Area'. Proposals for a skate park and an extension to the car park for users of the recreational facilities would not be restricted by these designations.	The Minister is not minded to amend the draft Plan
DP953		Deputy Philip Rondel	Parish of St John Working Party	Map .1	Proposals Map	Objecting	That field 224 is designated for allotments for the use of parishioners subject to confirmed demand and planning approval.		Reject	The site is detached from the built up area boundary. Whilst the difficulties of finding a site for development of this nature within the built up area boundary are recognised, proposals for	The Minister is not minded to amend the draft Plan



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										allotments will only be permitted that are in accordance with Policy SCO6, Allotments.	
DP954		Deputy Philip Rondel	Parish of St John Working Party	Map .1	Proposals Map	Supporting	Fields 236 and 237 were designated as H3 and H4 "Site for Future Consideration for Category A Housing" and "Site Safeguarded for Future Category A Housing. The DJIP 2009 proposes that these two sites revert to the Green Zone and the Working Party supports this proposal.		Support noted		The Minister notes support
DP955		Deputy Philip Rondel	Parish of St John Working Party	Map .1	Proposals Map	Supporting	Fields 676 and 677 were designated as Important Open Space. The DJIP 2009 proposes that these two fields revert to the Green Zone and the Working Party supports this proposal.		Support for the proposals map zoning noted		The Minister notes the support for proposals map zoning
DP971		Mr N P E Le Gresley	N. P. E. LE GRESLEY solicitor	Map .1	Proposals Map	Objecting	Proposed development of glasshouse site at property known as Alsmeer, la Route de St. Martin, St Martin for housing development.	My mother's property, Alsmeer, St Martin was first established in greenhouses in 1956 and those greenhouses were fully utilised for the purposes of growing tomatoes, cucumbers and peppers by my late father Edgar Stanley Le Gresley until the late 1970s. Thereafter the greenhouses, having become somewhat past their sell by date, were utilised by Richard Le Cornu for the purposes of indoor potatoes. The Alsmeer greenhouses are now in a complete state of dilapidation and whilst my mother Nance Amy Le Gresley, nee Le Selleur has recently had the glass panes removed from the most northerly block of the glasshouse site the structures still stand. As mum still lives at Alsmeer and whilst we have discussed these issues as a family for some time, it was considered proper that no application should be made for any planning whatsoever until such time as mum felt that she was unable to continue to reside in Alsmeer bungalow. Having reached the age of 89 years she happily continues to wish to reside in the bungalow and that is the reason that reference so far has not been made to your department in relation to any potential development of the site. Having seen the recent publications in the Jersey Evening Post mum has asked me to contact you to establish what steps should be taken on behalf of the family generally if any form of development on the Alsmeer site is to be permitted. It is not wished by any of us that any large scale of development would be implemented but rather a realistic number of residential units providing substantial garden areas with appropriate landscaping. The site measures approximately five verges and, having noted other similar developments on similar sites over the last decade or so, we would have thought that appropriate densities would, in the event of any	Reject	The Spatial Strategy states that there is a strong desire to protect the Island's countryside and prevent the further loss of greenfield land to development. This includes the redefinition, and extension of the built-up area boundary into the countryside to provide smaller-scale incremental development opportunities. In addition the plan makes it clear that there is sufficient land is available for the provision of Category B homes within the existing built up area, therefore there is no need to release additional greenfield land for development. Any development proposals put forward within in this location need to be considered in relation to their potential impact upon the character of the area. The application of the policy regime imposed by Policy NE7 is considered to be appropriate given the Countryside Character Appraisal evaluation of the area as 'Interior Agricultural Land'. Whilst there is a presumption against the redevelopment of redundant and derelict glasshouses for other uses unrelated to agriculture; in exceptional circumstances, Policy ERE7, Derelict and Redundant Glasshouses, permits minimal non-agricultural development in	The Minister is not minded to amend the draft Plan

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								consent being granted, suit somewhere between eight and twelve dwellings on the site. As I have said we do not wish to do anything until such time as my mother feels unable to continue living at Alsmeer but equally, and as a family, do not wish to suffer prejudice by virtue of the fact that we have not pressed this site for development in the past and would not so have done but for the recent publication of the proposals of the Island Plan disclosed in the Evening Post.		order to ensure demonstrable environmental improvement of the site by the removal of the glasshouses and any contaminated material, the reduction in the area of buildings, and the repair to the landscape.	
DP979		Mr. Maurice DUBRAS		Map .1	Proposals Map	Supporting	Open Space In concluding my comments on what needs to be earnestly protected, I am focussing on the area in the immediate vicinity of Magnolia Gardens. Indeed, I note the proposal to zone the four plots of land within this private development as IOS. As Chairman of the Group of Owners, I suspect it will be greeted with support but I have to confirm this at the next meeting of Owners. Around us, it is noted that the open space adjacent to St. Matthews Church is likewise to be protected.		Support for the proposals map zoning noted.		Support is noted by the Minister
DP981		Mrs Maureen Symes		Map .1	Proposals Map	Objecting	Fields 228, 230/230A, 613 & 616 in the Parish of St. John to be rezoned for housing & Public Hall (field 613)	We have been advised by Mr Butcher, the Constable of St. John that he would like part of field 230/230A to be used, initially, for the refecton of 15 semi-detached homes for 'First time buyers'. Furthermore my husband and I are both now over seventy years of age and wish to move from our present property, which is too large, and downsize to one more suitable for an elderly couple, which could be situated at the North end of the field. We also believe that another field, 613, has excellent potential for the construction of a rentable multi-purpose hall, with restaurant facilities and external car parking, to be used for indoor sports of various sorts, theatrical, choral and orchestral facilities, exhibitions etc. This would provide the Parish and the Island with facilities which are not available with the present Parish Hall.	Reject	The proposed sites do not comply with spatial strategy and does not meet with planning Minister's criteria for protecting green fields and open spaces. This includes the extension of the built-up area boundary, into the countryside, to allow for incremental development opportunities. There are, therefore, considered to be no grounds to identify other sources of supply to meet housing needs, including the release of additional greenfield land. Policy H5 (housing in rural areas) supports the provision of new housing as part of village plan proposals put forward by the constable and this is the policy where such housing sites may be considered in the future, provided they are required to support the vitality of the village.	The Minister is not minded to amend the draft Plan
DP1188		Mr Graham Bisson		Map .1	Proposals Map	Objecting	Field 200, Rue du Vieux Menage, St Saviour	This small field is exactly half an acre in size and is the residue of Field 200 upon which the bungalow now called L'Esperance, our home, now stands . We understand that originally the bungalow was a farm workers cottage probably built in the late 40's, since when it has been extensively enlarged and modernized. The dwelling is connected to mains services. (Foul	Reject	Site has a low 'spatial strategy' suitability, as the site constitutes previously undeveloped land outside the built up area and does not meet with planning Minister's criteria for protecting green fields and open spaces. This includes the	The Minister is not minded to amend the draft Plan

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								<p>drainage is by a pumped system to the mains sewer to the east.) There is an existing tar macadam drive leading from the public road, Rue du Vieux Menage, which runs alongside Field 200 on the south side to give access to L'Esperance at the top of this site. The field is used for the occasional grazing of a few neighboring cows, for no financial reward. It is of no other agricultural or horticultural value as it is too small for the economic growing of crops. Field 107 to the north is in public ownership having been purchased by compulsory purchase some years ago. Fields 159 and 160 to the south and the east are in private ownership and include some aged glass and very old agricultural buildings. The undeveloped part of Field 200 would be very suitable for the development of two or three single storey dwellings, (bungalows). We have a foster daughter and two married daughters of our own, each with one child, and we would like to provide each of them with a home on this site. In turn they would each be able to vacate the houses they now occupy which in turn would help the overall housing shortage. The existing driveway would provide access to any new dwellings and avoid the need to open a new entrance into a public highway. It is anticipated that mains services will be achieved by extending the existing provisions via L'Esperance. Alternatively there is a new mains sewer to the west of this site. The impact upon the "countryside" of such a development would be minimal and the new dwellings would only present a single visual frontage to Rue du Vieux Menage, as does the existing building, L'Esperance. I would therefore ask that serious consideration be given to the rezoning of this site in order that it may be included in the proposed Draft Island Plan when it is approved.</p>		extension of the built-up area boundary, into the countryside, to allow for smaller-scale incremental development opportunities. The Countryside Character Appraisal's evaluation is that the site forms part of the Eastern Plateau, Interior Agricultural land, E7 the landscape sensitivity of this area is high. The Plan makes it clear that throughout the plan period, sufficient land is available for the provision of Category B homes within the existing built up area. There are, therefore, considered to be no grounds to identify other sources of supply to meet housing needs, including the release of additional greenfield land. The draft Plan's Green Zone designation remains consistent with the 2002 Island Plan designation. Designating this built up area would contradict the established policy.	
DP1189		Mr Graham Bisson		Map .1	Proposals Map	Objecting	Field 1519, La Rue de la Ville au Neveu, St Ouen	<p>This very small site is the residue of Field 1519 and is approximately one seventh of an acre. It is of no agricultural or horticultural value</p>	Reject	Site has a low 'spatial strategy' suitability, as the site constitutes previously	The Minister is not minded to amend the draft

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								<p>whatsoever being very awkward in shape and contours. I have retained ownership of this land for the last thirty nine years in the hope of putting the land to better use. This piece of land has two granite pillars bordering the road providing an entrance into the site which rises sharply from the roadway . Field 1519A below this site is at a lower level, in fact road level, includes sheds and other smallholding structures and activities and equestrian facilities .There are main services in the road adjacent to this site. This site is centrally located in a "hamlet" of dwellings and commercial uses with a pleasant, established settlement feel with a mini village green and attractive mature trees and planting . Please see location plan showing number of adjoining properties. It is evident that the Draft Island Plan as published will not adequately meet the housing needs of this Island in the near or distant future. It is also obvious that this very small fragment of land is not best utilized left vacant, but would provide a decent home in a very suitable and established rural settlement location . It can hardly be considered as "open land". With some excavation of the site, so as to be similar to that of the adjoining Field 1519A, a small dwelling would add to the harmony of the established hamlet feel in this situation and the only visual impact would be a different color on the planners zoning map. I would therefore ask that serious consideration be given to the rezoning of this site in order that it may be included in the proposed Draft Island Plan when it is approved.</p>		undeveloped land outside the built up area and does not meet with planning Minister's criteria for protecting green fields and open spaces. This includes the extension of the built-up area boundary, into the countryside, to allow for smaller-scale incremental development opportunities. The Countryside Character Appraisal's evaluation is that the site forms part of the North Coast, Interior Agricultural land, E4 the landscape sensitivity of this area is high. The suitability of this site for housing purposes is low given its location, sited well away from the established built up area in an area of poor accessibility. The Plan makes it clear that throughout the plan period, sufficient land is available for the provision of Category B homes within the existing built up area. There are, therefore, considered to be no grounds to identify other sources of supply to meet housing needs, including the release of additional greenfield land. The draft Plan's Green Zone designation remains consistent with the 2002 Island Plan designation. Designating this built up area would contradict the established policy.	Plan
DP1195		Mr Mark Le Boutillier	GR Langlois	Map .1	Proposals Map	Objecting	We would request that further consideration is given to including the Le Mourin Vineries site on the new Island plan for first time buyer housing.	<p>Site Location/Current Use The site is located on the northern edge of Maufant village and is on a main bus route with a bus stop directly adjacent to the site. There is a footpath leading from the site to the existing Co-op Locale, hairdressers</p>	Reject	The site has been reviewed, and whilst it is adjacent to an existing built up area and does have good access to services and transport links, it is a relatively modern glasshouse	The Minister is not minded to amend the draft Plan

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								<p>and Maufant youth centre which are all within 100 metres of the site. The majority of the site is currently built over with an existing farmhouse, outbuildings and glasshouses and is therefore considered a 'Brownfield' site. The site owners are tomato growers and it has been well publicised in the JEP that the tomato export industry as a whole has now ceased trading as the industry has basically become unviable (see attached). The site owners have other sites under glass and if Le Mourin were rezoned for housing they would continue supplying produce to local shops from their other glasshouses.</p> <p>Possible Scheme Design/Amenities An initial scheme has been drafted for discussion purposes consisting 98 x 2, 3 and 4 bedroom first time buyer homes and the renovation of the existing farm complex. The overall scheme is low density and loosely based on Jersey farm courtyard style properties. Also included in the scheme is a new Co-op Locale store with post office and chemist. We have been approached by Jim Hopley (chief executive) of the Co-op who is keen to promote the possible re-location of the Co-op Locale onto the Le Mourin site as part of any overall development. A new purpose built medical centre incorporating a doctor, dentist, chiropodist and chiropractor together with a 'character village pub' overlooking a large village green amenity space would be included. A village pub would be a useful amenity which could provide pub grub, be a meeting place for various clubs and could hold quiz nights etc. The communities at Five Oaks and St Martin's village to the north and south of Maufant village benefit from a local pub. This facility is absent at Maufant village. There is currently no meaningful amenity or play space in the Maufant village area and a large new village green would be a significant planning gain and provide a useful amenity space for use by occupiers of the new properties and existing residents in Maufant village. Mains Services All mains drainage and services are available to</p>		<p>site with a planning condition for their removal should they become in to disrepair or disuse.</p> <p>The site had a major glasshouse extension to the existing glasshouses approved in 1997. The following condition was also attached to the permit:</p> <p><b><i>Should the glasshouses fall into disuse or disrepair they shall be removed from the site and the land restored to agricultural use.</i></b></p> <p>Discussions with the Planning &amp; Environment Land Controls Officer have indicated that there are existing growers within the horticultural industry that are looking to rent or buy glasshouses and so until such a time that redundancy can be demonstrated they would not support the removal of this glasshouse development for alternative non agricultural uses.</p> <p>Should the redundancy be demonstrated however then it is expected that the disuse and disrepair condition would be applied, unless there was an exceptional case put forward to allow alternative uses of the site to be allowed, which may include the urgent need for additional Category A housing.</p> <p>However, sufficient land has been identified in the draft Plan for the provision of Category A homes and there are, therefore, considered to be no grounds to identify other sources of supply to meet housing needs, including the release of</p>	



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								<p>service the site. Neighbours and Landscaping There would be extensive planting undertaken around the perimeter of the site and once established this would provide significant 'wildlife corridors' and obscure the majority of the new build ings from view from any of the adjacent lanes or the main road. There are no existing houses directly bordering the site so any impact to neighbouring properties would be minimal. Schools The primary school for the catchment area of the site is St Martin's primary school so the majority of school traffic would be in the opposite direction to town away from the main peak time congested areas. Information from the education department is that there would be adequate school provision at St Martin' s school for the development of the site from 20 IO. The frequent bus service runs directly from the site past a number of the secondary schools to town. Traffic and Transport The access to the site would be onto Chasse du Mourin which would be widened and extensively landscaped. The current poor junction with Chasse du Mourin and the main road (La Grande Route de St Martin) would be improved to create adequate visibility spay lines to comply with all the necessary safety requirements of the Transport and Technical services department The site is on a main bus route with a bus stop directly adjacent to the site. Currently the bus stops on the main road near a comer which obscures visibility and is quite dangerous. A bus lay-bye and shelter would be provided on the site aiding traffic flow and safety. The close proximity of existing and proposed new facilities would reduce the need for unnecessary car journeys. The site also has safe direct pedestrian access to the green lane network for walks and cycling etc. Demand in the Parish Some 18 months ago we undertook a survey to establish the level of demand specifically for first time buyers living within St Saviour, We received 194 replies from parishioners who required this type of housing</p>		<p>additional greenfield land by expanding the 'Built up Area' boundary.</p> <p>It is recognised that this site has a number of attributes that raise the suitability of the site for the provision of Category A housing. Should the identified supply of Category homes not become available or the future demand for Category A homes require the reconsideration of sites put forward, the availability of this site for development together with its merits will be taken into consideration.</p>	

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								29 (1 5%) of which lived in States rental accommodation. Many expressed their total frustration and deep disappointment at the lack of availability of first time buyer homes.Demand for first time buyer homes has not diminished since our survey but mortgages for first time buyers have become more difficult to obtain, although this situation is now improving. General/Conclusion There is a significant number of first time buyers in St Saviour and throughout the Island who are in need of these homes. The development of this site would deliver first time buyer housing in a specifically designed scheme on a site identified on the 2002 Island plan for the purpose. The development has the advantage of being on the edge of an existing village and would offer existing residents in the Maufant village area significant community amenities and benefits. These new facilities together with an increased use of existing amenities by new residents would breathe new life into the village revitalising the area. We would request that the Le Mourin Vineries site be given serious consideration to be included on the new Island Plan as a site to be rezoned for first time buyer housing, Please find attached:- 1, Site location plan of the Maufant village area identifying the site. 2, Ariel photo of site showing the extent of the existing farm buildings and greenhouses. 3, Draft site plan of a proposed development 4, JEP cuttings.			
Background & Context											
DP1107		Nigel Wray		1	Background and Context	Neither	One main point there seems to be missing is no one has taken any thought to proposals that might improve the Island for the benefit of Islanders ie The Locals . There is so much about this or that policy it seems The Locals have been missed out. If there is an application in public or private area that clearly the locals benefit from then it should be considered?!.	There are often applications which get refused which clearly would be a benefit to the Locals . Only to get passed at a latter stage due to discrimination against disabled or something. There should be more support for schemes where The Locals would benefit either visual or using. Thanks	Noted	The draft Plan is developed to provide for the general public interest, which embraces all Island residents.	Noted by the Minister
DP147		Mr Andrew		1	Background and	Objecting	The annual planned increase of over 300 people p.a. should be reviewed every year, not every 3	I'm not convinced that we need yet more immigration ( please, not 'in-migration'!),	Noted	Comment is related to population and migration policy and is not	The Minister notes the

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		Thompson			Context		years.	especially given the current economic climate. 300 + people p.a. means more housing, more infrastructure, more cars, more pollution, etc., which means less quality of life for people already living here. Will there be enough jobs for all these extra people?		related to the substance of the draft Plan	comments made but considers them not to be material to the draft Plan
DP267		Mr Nicholas Palmer		1	Background and Context	Objecting	The whole document is fatally flawed because it does not sufficiently weight, or even in some cases acknowledge, major drivers that are starting to, and will increasingly, affect the world and Jersey's part in it.	Any current or future plan which only looks forward ten years is fundamentally flawed. Notwithstanding the vast amount of work that has gone into this document, one has to say that the major flaw rests with the way that too many of the writers of the document are compartmentalising the concept of sustainability - a word which is frequently misrepresented locally. It looks like it is treated as "how do we sustain business and maintain expectations as usual" rather than "how do we make plans to live sustainably within our global environment". The underlying assumption seems to be that Jersey's economy needs to get back to growth so that environmental considerations and international obligations can be met. If not fully addressed, true sustainability concerns, which are more far reaching, will have much greater consequences than "merely" those of economic hard times. This document, by just considering a much too short time span, effectively airbrushes away the imperative responsibility that working towards correcting our non-sustainable environmental impact upon the world puts upon Jersey and similar developed nations. This draft Island Plan puts the cart before the horse - it sees one aspect of life as being all important while not acknowledging that the almost token regard paid to the other "sustainability" aspects, which are ultimately of much greater importance than the first one, is in no way adequate - not even close - because the first one absolutely depends on the second one! The environmental sections are fine as far as they go; particularly welcome is the cross-linked references to other areas of the document which shows the interconnected nature of this draft Plan. However, the weighting given to such topics as peak oil and food security, and the radical and fundamental restructuring of economies and infrastructure that they mandate is either too light or non-existent. It is no answer to pass on any responsibility to the Energy Green paper. Changes in world energy costs and availability will affect so much, so fast, that strategy needs to be in place now. For example, plans for building on greenhouse sites show the astonishing lack of awareness of what the future holds, and of how	Reject	The requirement for a long-term view to address wider issues of global sustainability are acknowledged but the draft Plan is developed within the context of a strategic policy and legal framework which requires its revision every 10 years and it, accordingly, seeks to address a 10 year time frame, whilst seeking to acknowledge that there are issues within it requiring a longer perspective.	The Minister notes the comments made but is not minded to amend the draft Plan

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								we will need to deal with it, that is so prevalent in island life. Within this document there are many policies that appear to make good sense with a 10 year outlook, unfortunately they are also diametrically opposed to the longer term necessities. It's pointless planning to jump 6 feet over a 30 foot chasm, no matter that for 6 feet one is making good measurable progress forwards... one would be infinitely better off taking a longer view and metaphorically taking the longer way round by finding the "sustainable way" bridge to the other side.			
DP268		Mrs Penelope Lee		1	Background and Context	Objecting	Object to the increase in population - jobs should be found for the current 1,200 unemployed before bringing in more people with more cars, more waste, more demand for housing. Immigration should be managed, not just allow anyone in, regardless of education or ability to speak English. Work permits or a points system should be introduced.	The quality of life for islanders is decreasing with more people, more traffic and more building.	Noted	Comment is related to population and migration policy and is not related to the substance of the draft Plan	The Minister notes the comments made but considers them not to be material to the draft Plan
DP354		Mr Adrian de la Haye		1	Background and Context	Objecting	Limit Population Growth - I believe this should be changed to stop population growth. Devise policies to gradually reduce the islands population	Over-population is at the core of many of the issues that we face in the island. We cannot simply let the islands population grow and allow the increase of pressure that this puts on so many resources build up - we have to take a radical step and work to gradually decrease the island population over the next 10 years.	Noted	Comment is related to population and migration policy and is not related to the substance of the draft Plan	The Minister notes the comments made but considers them not to be material to the draft Plan
DP355		Mr Adrian de la Haye		1	Background and Context	Objecting	1.11 - add as an option - reduction in the levels of support given to the growing and increasingly dependant non-working proportion of the population that is not of working age Also add as an option: Reduce the quality and range of public services which Islanders presently have access to.	I cannot believe that to solve the problem of an aging population the primary solution is to bring in more people. Seriously - this has got to be the most obviously short-sighted solution imaginable, I cannot believe ... then what ... in 10 years time the economy has even more people to support, and 10 years after that even more .... this just goes on. Population is time and again the biggest issue - so lets stop the growth, take the economic hit - but improve the quality of life.	Noted	Comment is related to population and migration policy and is not related to the substance of the draft Plan	The Minister notes the comments made but considers them not to be material to the draft Plan
DP36		Ms Chantal Gosselin		1	Background and Context	Neither	Population growth: an element of quality control not just quantity is required. A community is shaped by its people. We need to be attracting more professionally qualified and better educated sectors to the community. Currently people can get jobs based on duration of living in the island -not being the 'best person' for the job. There is a skills shortage at the higher level, management/professional/creative/developmental skills. We need people in key positions across the community that will encourage higher standards of delivery in all sectors. Why not introduce a points system along the lines of the Australian system, so that we can attract new talents to the island based on the skills they and their partners bring to the island. So that we are not just attracting polarised	We currently ave polarisation in our community-financial workers at one end/cafe and construction workers at the other. We are also developing severs social and behavioural problems because of this insularity towards separate communities. We need a greater mix of social and professional skills, a greater input of educational and intellectual mix. Providing a points system and maybe working towards building employment opportunities in different sectors i.e. university/educational tourism could only enhance the living experience and local facilities in the island	Noted	Comment is related to population and migration policy and not on the substance of the draft Plan	The Minister notes the comments made but considers them not to be material to the draft Plan

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							skills basis.i.e. finance and construction workers. If a person ant to move here and can offer a skills set, that we are short of, they should be given a licence to work and live here, and this could be closed when we have a surfeit. The POINTS system would need to be transparent to people across the world can see. Encouraging more intellectuals /professional of every level would have a profound effect on the behaviour/cultural/social and market demands of the island.				
DP390		Mr Nicolas Jouault		1	Background and Context	Neither	<p>The track record of the Minister in all what he says is something to be desired, during his and his predecessors leadership the Island has deteriorated in most aspects of what one would hope the Island plan would cover, it is worth noting that with a growing population on a small Island there is going to be a growing conflict with commercial gain, individual needs against the need to preserve what the Island is truly noted and valued for and that is its rural and maritime character that is being overlooked to placate the needs and demands for a society that is becoming more and more concerned about its own self interest and not that of the future legacy that we will leave for the next generation. This is of course mirrored by the policies of politicians that act in their own short term careers. I would question the need to write such a large and lengthy revision, we have an Island Plan why is their a need to re write and change it? We have the framework within the previous plan and in many cases it did not get implemented. This surely can not be best practice and value for the public? Consultation is welcomed but often my views and concerns as with other members of the public are ignored and cast aside, this does not instil confidence or engage the general public. Circa 10,000 opposed the waterfront hotel this went on with promises of "Iconic buildings" The current Minister said that the waterfront under his helm would have improved architecture the public has been failed miserably in this respect and now we have some of the most bog standard buildings that would not be out of place in any dull and dreary metropolis. Several thousand supported the "line in the sand" yet we have no great initiative to remedy the concerns of the public other than creating a coastal zone must of which is green zone anyway under old terminology. The more such classifications change it would appear more loop holes are created for those with self interest to exploit. Decent and unbiased managers and politicians is what is needed nothing more or less.</p>		Noted	There is a requirement to review the Island Plan every 10 years to provide the Island with a revised and up-dated planning policy framework which will address the needs of the Island for the next 10 years	Noted by the Minister
DP534		Deputy		1	Background	Neither	Allowing more people to live in Jersey - As a general		Noted	The draft Plan makes explicit	Noted by the



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		John Le Fondre			d and Context		observation, it we are going to allow more people to live in Jersey (especially due to the ageing population demographics etc, which I believe I am reasonably well briefed upon), then there does need to be an acceptance that we need to build higher where appropriate, with better spatial standards. I cannot see any other solution which ensures that our countryside is protected. (See comments below).			reference to the need to ensure that the development of land is used as efficiently and effectively as possible and this will need to include an increase in the density of development, as recognised in Policies SP2: Efficient use of resources and GD3: Density of development. The draft Plan makes provision for the assessment of tall buildings through Policy BE5: Tall buildings	Minister
DP627		Mr Alan Le Rossigno l		1	Background and Context	Objecting	I feel that the Plan is basically flawed as it has no directional framework from any Policy of Population Needs and Immigration and also no Policy about Diversification of the Economy. Policies in both these areas should give direction for the Land Use Plan but this does not appear to be the case.	At present there is a presumption that we need to build, build and build more and more residential accommodation without consideration of the consequences. Yes there is a demand but are more flats and apartments really the type of accommodation that islanders desire? Yes there is a demand for this type of dwelling but that is largely due to the fact that flats and apartments are cheaper. Perhaps they are a respectable alternative for housing less well off residents? There does not seem to be any desire to consider quality of lifestyle with more units crammed into smaller and smaller spaces. It is such a pity that houses are often built to minimal sizes with little scope for extension as a family grows and gardens are often tiny or non-existent. Frequently no garages or space for sheds are included in developments. Families so often have to bring up children in unsuitable accommodation with little space for children to have areas to play such as a garden. It seems that every available space in already built up areas is being identified for development to avoid building in the countryside. But when this is all built upon what will need to happen next? There needs to be a clear idea about how many people can live here without ruining the quality of life. Identifying sites is also creating a bonanza for builders who will seek to maximise their profits from sites identified as suitable for development. I feel that when the Plan is approved there will be a rush to develop those sites as quickly as possible and what will happen when all those have been developed? Usually residential areas are too densely developed, whereas a consideration for quality of life would dictate fewer and more spacious units with outdoor space planned in. The present demand for residential buildings is unsustainable as the infrastructure will also have to be expanded to cope, with the need for more water storage, drainage, sewerage disposal, waste disposal,	Reject	The Island Plan review process does not lead the determination of any immigration strategy for the Island: this has been established by the States Population Policy, and the draft Plan is seeking to respond to this. The States Strategic Plan has charged the Minister for Planning and Environment with meeting the Island's housing needs without developing any greenfield sites, to ensure that the Island's countryside is protected. The Minister has sought to do this by setting out a clear spatial strategy (at SP1) which seeks to meet most of the Island's development needs over the next 10 years in the existing Built-up Areas or on brownfield (previously developed) land. To ensure that this approach does not result in poor quality living environments, the draft Plan seeks to ensure new homes are provided to a good quality of design and specification and that important amenities and facilities in the urban environment, particularly open space, are protected, maintained and enhanced. The draft Plan also seeks to ensure that a mix residential accommodation is provided, in terms of the size and type of homes provided, which better meets the Island's housing needs (see Policy H3 and H4).	The Minister notes the comments made but is not minded to amend the draft plan on the grounds that the issues raised are already adequately addressed in the draft Plan

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								energy needs (electricity, gas and oil provisions) hospitals, schools, police, prisons, roads, parking, etc. All of these services will need to expand for a growing population. The present trend to increase the population is not sustainable without impinging on the quality of life for everyone and changing the character of the island for ever. Built up areas need open spaces for quality of life and it seems inappropriate to identify in-fill spaces for development. It will be a shame if the plan assists increasing urbanisation by spreading residential units everywhere. Any plan for land use should clearly follow a carefully considered policy on immigration and population growth. Often it seems that our politicians spend time deliberating less urgent or low priority concerns and these issues should have been considered before the Island Plan.			
DP723		Paul Harding	The Association of Jersey Architects	1	Background and Context	Objecting	The Association of Jersey Architects (AJA) recognises the Island's Plan important influence on determining Jersey's and Islanders future - not only determining our natural environment but also our physical, spatial and sociological development. We have therefore undertaken a lengthy consultation in canvassing the views of all AJA Members, held a special General Meeting on the subject, then formed a AJA Island Plan Review Group to prepare a response. From the reactions and comments received the consensus of opinion has been distilled to prepare the AJA's Response to the Draft Island Plan White Paper - September 2009 (2009 Draft Plan). We consider the Island Plan is an extremely important document affecting the lives of all Islanders - the way we live, what we live in, what we can do (or what we can't do) with our land and properties, what physical provision is made for our economy and commerce, our livelihood, how we travel, etc. - for at least the next 10 years. The Planning & Building (Jersey) Law 2002 places a legal requirement on you as Minister for Planning and Environment to rigorously follow the Island Plan provisions, without making exceptions. It would therefore appear that, once the Island Plan has been adopted by the States of Jersey, our future will be 'cast in tablets of stone'. We have not sought to comment on every Policy where it is apparent AJA Members hold neutral or varying opinions. Instead we have aimed to comment on the principal Policies and sections that we welcome and support, or have specific concerns at the same time wherever possible seeking to constructively suggest alternatives. 1.0 General Background 1.1 The 2002 Jersey Island Plan, together with introduction of the		Reject	The requirement to review the Island Plan at this time has been identified by the Island's politicians, as set out in the Strategic Plan, given the significant changes that have taken place in many aspects of Island life since the 2002 Island Plan was adopted.	Noted by the Minister

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							<p>Planning &amp; Building (Jersey) Law 2002 marked a watershed in modern Planning control in Jersey. Previous Island Plan's tended to be aspirational and indicative of how Planning Policy would be developed and applied. The 2002 Plan marked a distinct shift to prescriptive Planning, where the requirements and provisions of the Island Plan determined application of Planning Policy in deciding future Planning applications. 1.2 Although introduction of the 2002 Plan was not without controversy shortly ensuing over, inter alia, the so?called ' secret rezoning ' of countryside land pockets closely related and next to the Built-Up Area the AJA considers the 2002 Plan has successfully protected our core countryside and provided for our built physical needs over the last eight years. Apart from a few exceptions the 2002 Island Plan has been universally accepted and welcomed. Indeed Chris Shepley praised the 2002 Plan as being " one of the best " planning policy documents he has ever seen which, from a former UK Planning Inspector held in high esteem, is praise indeed. 1.3 In reality the so?called ' secret rezoning ' was not a secret at all - these small adjustments to Built Area boundaries were clearly detailed for all to see in the 2002 Plan draft. They rectified some inconsistencies and anomalies in the division between the Countryside and Built zones. Were the changes detrimental to the Countryside and Important Open Space? We suggest there has been no discernable adverse impact on the Countryside but they have helped to realise 'windfall' housing land for the Island. Subsequent designation of additional Important Open Spaces and rezoning of land for "Over 50's" retirement housing illustrated ongoing tension between protecting our Countryside while providing for Islanders built accommodation needs. Although these represent significant modifications we don't believe they undermined or invalidated the 2002 Plan. 1.4 It has been acknowledged the 2002 Plan has achieved a great deal of its underlying objectives. The performance of the 2002 Plan has been exceptional ? delivery of homes in the qualified sector exceeded the 2002 Plan target to provide 90% of the planned 2,860 homes over the Plan period by actually delivering a total of 3,149 homes between 2002?2006. 1.5 The National Trust for Jersey, in their response to the Strategic Issues Green Paper, questioned whether it was appropriate or even possible to review the Island Plan before a population strategy was debated and adopted by the States Assembly. The Green Paper itself</p>				

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							acknowledged this crucial problem, stating on page xi that :? "...It is necessary to make some planning assumptions in the preparation of the new Island Plan. It has to be made clear, however, that any planning assumption about immigration is not a foregone conclusion or 'fait accompli': the Island Plan review process will not lead the determination of any immigration strategy for the Island that is a matter for the States to determine within the context of a debate about the ageing population. The Island Plan will have to follow whatever the States determine, and the strategies, policies and proposals within the draft Plan, to be published in early 2009, may need to be subsequently reviewed to reflect the States ultimate deliberations." 1.6 The AJA believes we still have a robust, fit for purpose, Island Plan without any need for rushing into adopting a completely revised new Island Plan ? at least in the foreseeable future. The legal requirement on you to present a new Island Plan to the States Assembly within the next two years could, quite simply, be achieved by updating and editing the 2002 Plan to account for subsequent changes including States decisions and other initiatives. There is no imperative for a complete re?drafting and reworking of the Island Plan. 1.7 Other respondents to the Strategic Issues (Green Paper - July 2008) echoed this view, with the Council for Protection of Jersey's Heritage acknowledging " there is nothing seriously wrong with the Jersey Island Plan 2002 " and the Societe Jersiaise Environment Section concluding " the existing Island Plan was fundamentally correct in its approach and, for day today guidance on decisions, the Policies were an excellent starting point. At that level, all that was needed would be relatively minor changes, particularly with the aim of clarifying exemptions to presumptions either for or against the principle of individual policies ". 2.0 Crucial Issues 2.1 Before commenting on detail aspects within the 2009 Draft Plan it is essential to consider what are the objectives in preparing a new Island Plan. What are the crucial issues, what must be achieved and what is important? The Strategic Issues Green Paper consultation responses provided two very clear and loud messages:? 1) Protection of the Island's Countryside 2.2 There is extremely strong support for protecting and enhancing the core of Jersey's green countryside, which the AJA fully endorses. Over 80% of respondents to the Green Paper agreed the new spatial strategy for the Island Plan should concentrate new development within the existing Built-Up area (with a particular				

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							focus on St Helier) and the landscape character of Jersey's countryside should be protected. However, opinion about the extent of countryside protection and the extent of the Built-Up area painted a very different picture. For example, only 42% of respondents disagreed with the spatial strategy allowing development of brown?field land outside the Built-Up area. But there was less support for development on green?field land where it would help to maintain and enhance rural parish communities, with 55% of respondents being against such rezoning of agricultural land to expand Parish villages. 2) Designating a West Coast National Park 2.4 The AJA generally supports designating the West Cost as a National Park. Support is virtually universal Island?wide, with 78% of respondents to the Green Paper agreeing with designating St Ouen's Bay and the West Coast as a National Park and 91% agreeing the Island Plan should introduce stricter policies for protecting the coast where it is undeveloped. Core Issue - AJA Opinion 2.5 Within Jersey's limited land area there are competing pressures - to maintain the Island's character and green countryside on one hand, while providing for our population's needs in terms of built facilities (not least housing) on the other hand. 2.6 It is unfortunate the debate about balancing these two fundamental objectives has become confused with and interwoven into other debates about population of the Island. As previously noted the Island's decision over population strategy generates the driver for determining Planning Policy over how the Island's built and natural environment is balanced, not the other way round. 2.7 The AJA believes it is important to protect, conserve and enhance the Island's core countryside, areas of open space, high scenic quality and outstanding character. These are fundamental to our quality of life, important for agriculture and also attract visitors. 2.8 Providing for an adequate housing supply is the crucial problem any Island Plan must resolve in order to be a successful Plan. Without this the resultant shortage of supply against increasing demand just from internally generated housing needs will result in ever increasing housing prices and inability of young Jersey people being able to climb on the housing ladder. In examining the 2009 Draft Plan the AJA hoped an answer would be found to achieving this core issue. The 2009 Draft Plan - AJA Response 3.0 General Comment Locally Drafted 3.1 In general the AJA congratulates the Policy & Projects division of the Planning Department for their work on preparing the 2009				



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							<p>Draft Plan. Overall the Plan is very well written, thorough and precise. Any subsequent criticism of specific aspects is to be taken as comment on the political and social framework that has influenced the Plan, not any reflection on Officers involved with writing the Plan. 3.2 The AJA would like to specifically commend the clarity of the Island Plan Proposal Maps accompanying the Plan, which are a distinct improvement on the 2002 Island Plan maps. Clarity of Objectives + Indicators + Proposals + Policy 3.3 We commend the clarity of identifying what is an Objective, an Indicator, a Proposal and a Policy. We trust this will assist with separating out overarching aims (Objective) and measures of achievement (Indicator) from the actual Policies (supplemented with SPG's / Masterplans defining Proposals) that will be applied to future Planning Applications. Pressure Groups 3.4 The AJA is particularly, extremely, concerned about the growing pervasive influence of nongovernmental, non-elected, pressure groups over Planning policy and decision making in Jersey. It is becoming increasingly apparent their influence over Planning policy and the import given to their opinions is disproportionate to their membership. There is further concern the position they take and opinions they promulgate does not actually reflect the position and views of their own members as it is known their full membership is not always consulted on such matters. The AJA would like to point out the Planning and Building (Jersey) Law 2002 specifically lists all statutory consultee's whom the Planning Minister must consult. There is concern the views of such groups have had undue influence over writing of the 2009 Draft Plan. Requirement for a new Plan 3.5 The AJA seriously questions why there is a need for a completely new Island Plan. The 2009 Draft Plan fails to detail why there is a need for a new Plan except for stating the legal requirement to review the Island Plan every 10 years. The legal requirement to review the Island Plan does not impose a requirement to prepare a completely new Island Plan. The 2009 Draft Plan does not provide any substantive justification for undertaking this significant, time demanding, and expensive exercise. Supplementary Planning Guidance (SPG) 3.6 Many AJA Members have expressed a common concern, also voiced in our representations about the 2002 Island Plan that introducing a new Island Plan without having the key SPG's in place runs the risk of leaving us in a Policy implementation vacuum. We have been waiting over too many years for SPG's, such as</p>				

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							Parking & Housing Density, to be updated and released. The 2009 Draft Plan Policies are, in many cases, aspirational and continued lack of supporting SPG's will leave interpretation open to inconsistent application between specific sites. Large parts of the 2009 Draft Plan relies on supporting SPG's that do not exist. Constraining -v? Facilitating 3.7 We are disappointed the 2009 Draft Plan continues the prescriptive Planning approach, focussing on what we cannot do with our Built and Natural Environment. It is very negative in setting out what we cannot do and there is little about what we can achieve. What is the vision for the Coastal National Park? Where is the vision for St Helier, which is no longer seen as a town but a regional Capital. Maxing out density and scale of St Helier to provide all our built needs will result in significantly changing its scale and character.				
DP765		A H Harris		1	Background and Context	Neither	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 too establish whether all elements of the St Mary Village Scheme have been honoured.		Noted	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.	The Minister is minded to amend the draft Plan to include a list of development plans superseded by the new Island Plan
DP828		Mr Rod		1	Background	Objecting	Protect and enhance our unique culture and	ESC has an important stake in the Island Plan	Accept	At 1.6 add 'Protect and enhance	The Minister is

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		Mcloughlin			d and Context		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.	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: 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) 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:		our unique culture and identity' to the list of strategic priorities	minded to amend the draft Plan
DP864		R Anthony	Societe Jersiasse	1	Background and Context	Objecting	The Societe's Environment Section has twice recently tried to contribute to the consultation on the Draft Island Plan. On each occasion we have been unable to find a way to formulate a response. Although Ralph Buchholz has offered us whatever assistance we might need, at the last attempt it was decided that not only was this an impossible task but it would be a dangerous path to follow. The very few responses reproduced on the website connected with the consultation may not be a reliable indication of residents' support for the	We feel that the tenor and majority of the policies in the 2002 Plan continue to be generally supported and, with an intended lifetime to 2012, there is no need to attempt a complete re-writes so soon. Topics could be dealt with separately over a period of months, having been prioritised so that the most urgent and most comprehensive ones were considered as soon as possible rather than having to wait their turn while the entire Draft was subject to an Inspector's assessment. As you say in your Introduction, it is essential that there should	Reject	The Council of Ministers and the States has resolved to review the 2002 Island Plan to address the significant changes that have occurred within many aspects of Island life since the adoption of the 2002 Island Plan. Whilst there are some aspects of Plan development that can be developed discretely and in isolation, the Island Plan seeks to	The Minister notes the comments but is not minded to divert from the approach being pursued

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							process but that may be an indication that we are not alone in finding it difficult to become fully involved. As you say in your Introduction to the Draft, it is important that as many people as possible should get involved and that this should be done in an open and transparent way. We have become convinced that, by approaching a revision of the 2002 on such a large scale, too many people will be intimidated by the sheer size of the document: if they look only at aspects that are of particular interest to them, they will know that the remainder of the document may contain material that they would wish to contest if they had known that it was there.	be a consensus of views. We believe that this cannot be obtained by the process that is being followed. As a group with long-established concern for both the environment and the planning system, we would prefer to be closely involved with development of the next Island Plan, but we regret that we cannot see how we, together with many other stakeholders, would have as much confidence in a Plan that would evolve from this process as we have in the current Plan, whatever amendment it may require. We urge you to consider whether the revision of the 2002 Plan cannot be achieved in a way that leads to a Plan that has been developed through more effective public involvement, ie. by taking it section by section to render the whole more digestible and approachable.		provide an integrated and comprehensive planning framework for the next 10 years and this needs to be undertaken as an holistic exercise.	
DP886		Mr Andrew Heaven	Health Improvement (Public Health Department)	1	Background and Context	Objecting	The Islands environment and public spaces are crucial to improving public health. The Island Plan represents an opportunity to positively influence islander's health along with its other stated objectives. There are many aspects of the draft plan which could contribute to the States Strategic commitment to improve the public's health. However these connections are not made obvious enough. This is further evidenced in the absence of the word 'health' throughout the document. At present this draft plan represents a missed opportunity for improving the population's health. My overall comment about the draft plan is that it needs to be much more explicit in terms of public health gain which could be achieved in delivering aspects of the plan. I think the successful inclusion of public health would enable the strategy to provide a secure platform for future joint working and the delivery of key commitments outlined in the States Strategic plan.		Noted	The Island Plan is primarily a land use plan, which seeks to set the planning policy framework for the Island over the next 10 years. It is acknowledged in the Plan that there are aspects of land use planning that can significantly impact upon health issues, particularly in relation to the quality of people's living environments (including housing); access to open space and recreation opportunities; and travel and transport. Reference to the linkages with these health issues is made at the start of each relevant chapter. The Plan has been developed within the context of the States of Jersey Health for Life Strategy, with particular reference to the work undertaken in relation to the promotion of more physical activity. Of most significance is considered to be the inclusion of the appropriate policies and proposals in the draft Island Plan that are consistent with promoting and providing for a healthier environment and a healthier population and it is considered that the draft Plan is sound in this respect. It is the provision of a sound policy basis that should provide the platform for constructive joint-working	The Minister notes the comments made and is minded to amend the draft Plan

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										and integrated government. Any proposals for greater health reference will be duly considered where suggested, and considered appropriate and relevant. To highlight the strategic linkage between the draft Plan and the strategic objectives for health it is considered appropriate, at 1.6 to add 'promote a healthy lifestyle' to the list of strategic priorities	
DP915		mr daniel wimberley		1	Background and Context	Neither	I do Recommend that the paragraphs about Imagine Jersey be rewritten to reflect what actually happened. The public at that event did not endorse population growth, they endorsed a process of inward and outward migration which would lead to a stable population. It is unseemly that in an objective Planning document such as the Island plan this spin should raise its head (again)	The acceptance in the Plan of the States-agreed policy of increasing the population creates pressure on every aspect of the plan. We are faced with the Hobson's choice of more building in our lovely countryside or packing more people into the town. Jersey's "needs" for example in paragraph 2.17, are entirely dependent on this issue of population. What is the point of running to stand still?	Reject	The Island Plan is not the determinant of population policy but is simply seeking to respond to the strategic direction provided by the States Assembly in relation to population (set by the Population Policy) and the form in which housing needs ought to be met (set by the Strategic Plan).	The Minister notes the comments made but is not minded to amend the draft Plan
DP917		mr daniel wimberley		1	Background and Context	Neither	a) more generally, the Plan refers to economic growth as a given. E.g. 5.6, 5.7, 5.8, 5.13, Nothing in a Plan lasting 10 years should now be predicated on an assumption which more and more people rightly see as itself unsustainable. "Anyone who believes that growth can continue forever in a finite world is either a madman or an economist". - Kenneth Boulding b) the reality of climate change and peak oil should be highlighted in the Plan as high level constraints on any land-use plan	There is a quite robust section in the Plan about climate change and the challenge this poses. However this is not really integrated into the Plan.	Noted	The requirement for a long-term view to address wider issues of global sustainability are acknowledged but the draft Plan is developed within the context of a strategic policy and legal framework which requires its revision every 10 years and it, accordingly, seeks to address a 10 year time frame, whilst seeking to acknowledge that there are issues within it requiring a longer perspective.	The Minister notes the comments made but is not minded to amend the draft Plan
DP999		Mr John Mesch	Council for the Protection of Jersey's Heritage	1	Background and Context	Objecting	The Council is disappointed to see comments made by the Council during the public consultation on The Island Plan Review: Strategic Options Paper - Green Paper (July 2008) seem to have been ignored in the present draft. We still hold to the opinion that there is nothing seriously wrong with the present plan, especially since amendments have already been made to re-zone green fields for more residential development. Apparently this was the only pressing reason to amend the plan. It is interesting to see that once again this latest draft includes the re-zoning of yet more land in the countryside for residential development. We agree with the opinion of Societe Jersiaise that the present plan should remain in force until 2012, the planned date for its next revision. Faults and deficiencies in the draft issued for consultation include the following: 1. The present document is too large, it is long-winded, contains unnecessary material and		Noted	Requirement for review: The requirement to review the Island Plan at this time has been identified by the Island's politicians, as set out in the Strategic Plan, given the significant changes that have taken place in many aspects of Island life since the 2002 Island Plan was adopted. Rezoning of land: The Spatial Strategy of the draft Plan is not to rezone land in the countryside for new residential development but to focus the Island's development needs within the existing Built-up Area and on brownfield land. Validity of current Island Plan: the 2002 Island Plan will remain in	The Minister is not minded to amend the draft Plan



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							<p>therefore lacks conciseness and clarity. 2. The present draft contains no fewer than 22 separate proposals which add considerably to its bulk. The Council is of the opinion that the plan should be restricted only to clear statements of policy needed to assist the planning committee, sub-committees and Panels in arriving at decisions that are in accordance with the purposes of the Planning Law and established States policy. It is our opinion that proposals which have not yet received endorsement can constitute neither a fixed component of a plan nor an established policy. We believe that all the current proposals should be transferred to a separate document to be presented for public consultation and approval by the States in time for the intended review date in 2012. Indeed this seems already to be the process adopted for the recently issued Historic Environment Review White Paper, although it is not clear how the results of this review will be fed into the Island Plan itself. 3. For similar reasons, the sections on objectives and indicators add little or nothing to the effectiveness of the policy statements that follow. As with the sections dealing with proposals these could also be transferred to a document of their own. 4. The hierarchical position of the Island Plan in documents providing planning authority under the law should be shown at the outset in the form of a simple organisation chart (wiring diagram). The purposes of the Law as described in Article 2 of The Planning and Building (Jersey) Law 2002 should be reproduced exactly as written in order to establish the primacy of this document as the legal foundation upon which the draft plan is made. 5. Similarly, international recognition that the conservation of cultural heritage is both a legal and a moral responsibility of governments should be clearly shown and stated in the introduction. As a signatory to both the Valletta and Granada Conventions the States of Jersey have a clear legal responsibility to record and conserve our cultural heritage especially its archaeology, historic monuments, architecture and the natural environment. It is understood that legally binding international agreements such as Valletta and Granada take precedence over national, local law.</p>			<p>force until adoption of a new Island Plan. It is not envisaged that the new Island Plan will be debated until at least Q1 2011. Complexity of Plan: The provision of a comprehensive and integrated planning policy framework for the Island for the next 10 years inevitably results in a relatively complex and weighty document. During the consultation process attempts were made through leaflets, exhibitions and engagement with the media and the public, to distil the key issues addressed by the draft Plan and the policies and proposals contained within it; Proposals: the inclusion of proposals in the draft Plan is consistent with law where they are considered to further the purposes of the law. Their inclusion in the draft Plan assists and provides for a more comprehensive and integrated approach to the planning of the Island. Historic environment review: the draft Plan establishes the planning policy framework within which decisions affecting designated buildings and places will be made. The review of the historic environment protection process will determine the process by which buildings and places become so designated: a process which is separate to and distinct from the policy framework of the draft Plan. Objectives and indicators: these seek to make clear the purposes of policy in the draft Plan and seek to provide a framework against which the performance of policy can be subsequently be assessed and measured. Status of the Island Plan: unlike the UK, the hierarchy of planning documents is relatively simple in that there is one form of development plan for the whole Island - the Island Plan, which provides the planning</p>	

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										policy framework for development in Jersey. This may be supplemented by the development of supplementary planning guidance, which may be adopted by the Minister for Planning and Environment. This relationship is set out in 'Format of the Plan'. Law: there is reference to the law made throughout the document, mainly in the form of footnotes. It is not considered necessary or desirable, in terms of the ease of access and use of the draft Plan, to cite the relevant sections of the law in full. International agreements: reference to these is cited where relevant and applicable.	
Strategic Policy Framework											
DP626		Lord Brownlow		2	Island Plan Strategic Policy Framework	Supporting	It has been a real privilege to be able to read this splendid report, a real tour de force, which embraces every aspect of planning with particular regard to sensitivities of the environmental impact on our most precious asset within the small island, the land itself. A report such as this which has been the subject of such exhaustive research and which, no doubt, includes the valuable advice and input from many people can too often be allowed to collect dust 'ere long remains ignored and long forgotten. So may I invoke the hope that the principal Proposals will be adopted and thereafter adhered to all times and may this Island Plan become a planning template for the future, it should be used as an ongoing reference point on all sensitive planning matters - may it never leave the desk of the Chief Planning Officer. Incidentally are we able to know the identities of the wonderful people who are the co-authors of this terrific document.		Noted	Noted	Support is noted by the Minister
DP772		Mark Forskitt	Jersey Climate Action Network	2	Island Plan Strategic Policy Framework	Neither	Jersey Climate Action Network notes the tremendous amount of effort that has gone into the draft Island Plan. In order for any plan to be effective it is essential that the major drivers that will critically affect the world in general over the next decades are taken into account when formulating strategy. We feel that despite the extensive cross referencing showing the links between the various sections, which is to be applauded, the weighting given to the ramifications		Noted	The requirement for a long-term view to address wider issues of global sustainability are acknowledged but the draft Plan is developed within the context of a strategic policy and legal framework which requires its revision every 10 years and it, accordingly, seeks to address a 10 year time frame, whilst seeking to	The Minister notes the comments made but is not minded to amend the draft Plan

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							of climate change prevention or mitigation policy, preparing for the post peak oil economy and even such basic things as food security, is far from optimum. Clearly the draft Island plan is based upon expectations identified in the Strategic Plan and the Imagine Jersey 2035 exercise, both of which had shortcomings and insufficiently vital factors, identified by consultees, that were not addressed. Drafting a new Island Plan means that flaws and omissions from previous uncorrected documents should be considered as a matter of urgency. To put it bluntly, the whole plan seems almost unaware of the radical nature of the planning and preparation required to transition our island, and the world, to a post carbon economy along with the concomitant reduced energy availability and increased costs. The nature of the changes is so all encompassing that they lead directly to an imperative that planning should be for events predicted to unfold over many decades, not merely the 10 years that the draft plan is aimed at. Without full cognisance of these very important multi-decadal drivers, any plans or policies drawn up now can be at best temporarily effective, probably leaving us at the end of the ten year period in a very much more difficult strategic position, having missed out on years of vital action. If we don't realise that there are icebergs ahead, how can we plan a competent route map or arrival time?				
DP907		mr daniel wimberley		2	Island Plan Strategic Policy Framework	Supporting		Renewed statement of support for the preservation of the natural beauty / marine environment / and biodiversity	Noted	Noted	Support is noted by the Minister
DP968		Mr. Maurice DUBRAS		2	Island Plan Strategic Policy Framework	Supporting	I am delighted with the proposed principles set out and the heavy emphasis on sustainable development with the acknowledgement of the climate change situation that humankind finds itself in. Regardless of whatever natural cycles are coming into play, there is no question in my mind as to the effect that we globally and Jersey locally have played in accelerating upward temperature change and rising sea levels. The consequence on each and inter-relation between all the principles set out cannot be over-emphasised. I am satisfied that the work begun in former Deputy Harry Baudains' time, and continued with most of his successors, has become much more manifest through this document. May I respectfully suggest that Item 2.6 Quality of Design should not restrict itself to architecture? The disciplines of engineering all have to be taken into consideration and need emphasis		Noted	Noted	Support is noted by the Minister

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							in this document. Your singling out of architecture suggests that, not unusually, the work of engineers is forgotten or considered to be in the background. May I urge you to place due weight and give full recognition to the place that engineering has in Jersey and in your aspirations across most if not all the principles . The two professions have to work together, each taking the lead from time to time.				
DP148		Mr Andrew Thompson			Sustainable Development	Supporting	Spatial Strategy,2.15 : The new Island Plan reinforces the previous 2002 Plan...	The emphasis of the 2002 Plan's Spatial Strategy was: 1) to use the existing built-up area rather than encroaching into the countryside, 2) to re-use brown-field sites rather than green-field ones, 3) to ensure that areas of environmental importance are not to be used as development locations. These points need to be stressed in the new Plan.	Noted	These points are stressed in the draft Plan and form the basis of Policy SP1, as set out in the policy itself and Para. 2.18	The Minister notes the qualified support for this policy but is not minded to amend the draft Plan as the issues raised are already adequately addressed
DP33		Mrs ani Binet			Sustainable Development	Objecting	The evidence that climate change is happening, and that man-made emissions are its main cause, is strong and indisputable ( 1 ) . I believe the word indisputable should be removed from this statement.	Nothing in Science is ever "indisputable" as knowledge is not fixed, the whole point of science is to examine and re-examine subjects to always try and increase and improve our knowledge and understanding of them. If knowledge in a scientific subject does become fixed that is when it becomes philosophy or religion rather than science. Scientific knowledge is meant to be questioned whereas religion is just there to be believed.	Reject	The phrase referred to is a quotation from a cited source	The Minister is not minded to amend the draft Plan
DP400	Mrs Stephanie Steedman	Mrs Stephanie Steedman			Sustainable Development	Neither	The Report 'Climate change, Jersey: Effects on Coastal Defences' 2007 predicts a 0.5 metre rise in sea-level. Has the impact of this increase been considered in terms of the location of new development; particularly in St Helier? It is understood that there is some debate about the impact of climate change: however, what if this prediction is correct? It seems prudent to follow the precautionary principle and map out those areas Islandwide likely to be affected by future sea-level rises and create no-further-development zones; similar to flood plains in other jurisdictions. It is not clear whether the sea-defences around St Helier are adequate for the purposes of preventing flooding as a result of any sea-level rise? This should be investigated and the results form part of the land use strategy for the town.	Any increase in sea-level rise will have an impact in terms of flooding and consequently damage to property and infrastructure. The Island should be planning for this now. This Draft Plan provides an opportunity for making sure that these issues are addressed and the implications understood now, so that they can be planned and budgeted for.	Noted	The Spatial Strategy of the draft Plan essentially seeks to focus new development on existing areas of developed land which are already defended from the sea and which would be the areas the subject of further investment to safeguard the existing development and infrastructure from future risk of sea level rise.	Noted by the Minister
DP494		Mr Paul Harding	The Association of Jersey Architects		Sustainable Development	Objecting	We need to get away from the notion that development is somehow 'bad' for sustainability. It is obviously unsustainable to waste natural resources but failing to adequately provide for our future built needs and housing is also unsustainable.		Reject	It is considered that the Plan recognises and adequately addresses the requirement for development to sustain the Island over the next 10 years in relation to the protection of the environment but also to provide for the growth and diversification	The Minister is not minded to accept the comments made as they are already adequately addressed in the

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										of the economy and the provision of community needs (ref 2.7-2.14)	draft Plan
DP539		Deputy John Le Fondre			Sustainable Development	Supporting	Para 2.16 Little support for the extension of the built-up area boundary into the countryside - agreed		Noted	Noted	Support is noted by the Minister
DP870		Mr Stephen D Smith	Health Protection Services		Sustainable Development	Neither	The Island Plan review allows Jersey to plan for the changes brought about by global warming in the next 100 + years through raised sea levels, flooding etc. It is important the Island plan provides the necessary drivers for the following to occur i.e. planning should start now on improving existing defences over the coming decades to deal with the impacts of sea level rise. Marine water intrusion represents the greatest risk of flooding and therefore the most significant major risk to the islands population and its infrastructure in the highly populated low lying southern coastal areas.		Reject	The Spatial Strategy of the draft Plan essentially seeks to focus new development on existing areas of developed land which are already defended from the sea and which would be the areas the subject of further investment to safeguard the existing development and infrastructure from future risk of sea level rise. The management and maintenance of sea level defences is out with the Draft Island Plan and falls within the remit of the Transport and Technical Services Department	Noted by the Minister
DP540		Deputy John Le Fondre		Map 2.2	Settlement Type	Objecting	Para 2.23 - Other built-up areas - it seems to me that one area that is deserving of careful consideration is Red Houses / Les Quennevais. Much of the housing is extremely tired, and there are many areas which need some TLC. Equally, it is an urban area, and in my view could cope with some buildings that are taller than those presently in existence. There does not appear to be any appetite within the department for this view. IE reference is consistently made to surrounding buildings, which given that they are a mix of bungalows and semi detached houses does seem to constrain development of brown field sites if the design of any new housing has to match the existing style.		Noted	The draft Plan makes it clear that there is a clear need to increase the density of development where land is redeveloped. This forms an important principle of the Plan and is clearly set out in Policy SP2, and the justification thereof, specifically para. 2.36. It is made quite explicit here that the density of existing development need not dictate that of new development by stifling change or requiring replication of existing style or form - this principle would thus apply to any development at a location such as Les Quennevais/ Red Houses, which clearly is a very well serviced urban area.	The Minister notes the comments made but is not minded to amend the draft Plan as they are already adequately addressed
DP1027		Ray Shead	The Jersey Chamber of Commerce	Policy SP 1	Spatial Strategy	Objecting	The basic approach of targeting St Helier for the majority of new housing requirements with a minimal impact on the Countryside Zone should be reviewed. It would appear that the general findings of the Planning Department are based upon the Imagine Jersey 2030 forum which, it could be argued, is not a fair representation of the Jersey population. From the experiences Chamber has had at the Planning Department's consultation road shows, it appears that only a small segment of society tend to attend these meetings and/or make		Noted but not minded to amend plan	The proposed spatial strategy is balanced in that it seeks to focus the Island's development needs to the existing Built-up Area, which is not solely focused on St Helier but which relates to all parts of the Island, set out in Map 2.2; it seeks to make use of some limited brownfield land on the edge of the existing BUA to provide for affordable family	The Minister notes the comments made but is not minded to amend the draft Plan as the issues raised are already adequately addressed



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							comment. Low income Jersey residents or families do not make their views known via the formats that the Planning Department has been adopting and therefore, if the opinion of this part of the Island's community has not been sought, the basic philosophy behind the Island Plan's spatial strategy is flawed. Chamber would urge the Planning Department to discover a better way of engagement to ensure that a full scope of the population is obtained prior to making these fundamental decisions. It is believed that this zoning policy will lead to a two-tier housing market, causing inflation on the existing housing market, i.e. the residential accommodation in the country will become sought after as it becomes rarer whilst urban living becomes less desirable. High density urban living for middle to low income families leads to social problems as can be seen from recent times in large cities in the UK. The basic problem is that UK society does not have the aspirations the Island Plan is aiming at. It has been widely noted that young families need to live in accommodation that has protected zones, forming spatial ownership. This means a protected front garden/entrance way and private amenity space which is overlooked, maintained and policed by the residents. High density urban living in flats does not provide this basic requirement and will lead to anti-social behaviour. The Draft Island Plan suggests that good design will resolve these issues however the ingrained cultural patterns of people's expectation cannot be answered by good design alone in the short term. Further consideration should be given to expanding the built-up area to include for high density, low level house building to meet the cultural and communal requirements.			homes; and it also recognises the potential for the development of new sites in some of the Islands northern rural parishes, as set out at Proposal 14: Village Plans. The social and cultural implications of seeking to increase the densities of urban development are acknowledged but it is considered that the draft Plan makes it clear that a high standard of development and urban environment will be sought to be produced by the policies of the Plan, and that the community facilities required for good urban living will be protected and enhanced. The difficulty of engaging all sectors of the population is acknowledged. This new Island Plan will, however, have been subjected to the most rigorous and open processes of Island Plan production ever and will be debated and adopted by the States Assembly on the basis of the wider public interest, relating to all sectors of Island society. The Imagine Jersey event is but one material consideration in the development of the draft Plan and the Spatial Strategy adopted is based on a much wider consideration of evidence and opinion than just that, and is considered to represent a sustainable approach to meeting the Island's development needs, as set out in the draft Plan.	
DP1134		Mr Philip Le Quesne		Policy SP 1	Spatial Strategy	Objecting	Island Plan and Green Zone: Ask all Parish Constable to identify small areas in their parish which must be considered for development. These areas not viable to agriculture. Areas to be considered would be less than 2 verges. The owners must have owned the land for at least 20 years.	To help first time buyers onto the property ladder. To create the opportunity of living in the countryside I do not agree with the ideas that development is in or around Town only. To safeguard our next generation from leaving the Island because of expensive housing.	Noted	The proposed Spatial Strategy potentially enables the provision of small-scale development in rural parishes in support of local communities under the auspices of Policy H5: Housing in Rural Centres and Proposal BE14: Village Plans	The Minister is not minded to amend the draft Plan as the issues raised are already adequately addressed
DP1170		Mr and Mrs Lees-Baker		Policy SP 1	Spatial Strategy	Supporting	The use of existing urban or brownfield sites, including ex-glasshouse sites, is encouraged and supported. (Supporting)	In order to protect countryside and green zones building on existing derelict building or glasshouse sites must be used in priority to any development of protected, countryside or green zones.	Noted	Noted	Support is noted by the Minister
DP143		Mr Peter McLachl		Policy SP 1	Spatial Strategy	Objecting	I really think the idea of increasing housing in town to the detriment of the Parish Communities is a	I think in view of the need to increase population for growth means that you will be storing up	Reject	The draft Plan is responding to the objective of the States, as set	The Minister is not minded to

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		an					short-sighted policy. I understand that people want to keep building in the countryside to a minimum but there is a certain bit of nimbyism here. If you phrase questions in such a way of course the few who do bother to respond will take the easy way out.	problems for the future. The bringing up of families when the only unit of accommodation seems to be flats is not healthy. Far better to keep the parishes vibrant or else like the villages in the West Country they will die on their feet.		out in the Strategic Plan, to meet the Island's housing needs without developing greenfield land, and also seeking to set out a more sustainable pattern of development for Jersey. The draft Plan does, however, recognise the need to support some parish communities and seeks to enable their vitality and viability through the development of Village Plans (@ Proposal 14) which may see new housing development in some of the northern rural parishes over the Plan period.	amend the draft Plan as the issues raised are considered to be adequately addressed
DP269		Mrs Penelope Lee		Policy SP 1	Spatial Strategy	Supporting	Agree, development should be in St Helier on brownfield sites.	Currently, there are large quantities of properties available for sale from lower cost flats to £2 million plus. There should be a slowdown in development until these have been sold. We live in times of economic uncertainty are there going to be the jobs to enable people to buy the properties available now, let alone more?	Noted	Noted	Support is noted by the Minister
DP414		Mr Marc Burton	Institute of Directors	Policy SP 1	Spatial Strategy	Supporting	Further consideration should be given to developing brownfield sites in the rural Parishes. See attached letter	To stimulate and protect parish values and enable existing residents to remain in their parish (i.e. provision of over 55 accommodation and younger first time buyers. See attached letter	Noted	Policy SP1 and Proposal 14 enable the provision of small scale development in rural parishes where this can be evidenced by need and where environmental impacts can be mitigated	Support is noted by the Minister
DP442		Mr Charles Alluto	The National Trust for Jersey	Policy SP 1	Spatial Strategy	Supporting	The Trust welcomes that planning permission will only be given for development which is appropriate to the coast or countryside, but remains concerned that the word appropriate is not defined in any way and does not relate to any other specific policy. This could result in future misinterpretation.		Noted	Policy SP1 remains a strategic policy and sets out a general strategic principle: proposals will remain to be subject to more detailed consideration in relation to other specific policies in the draft Plan depending where the proposal is located within the coast or countryside e.g. Policy NE5: Marine Zone; Policy NE6 Coastal National Park; Policy NE7 Green Zone and Policy BE4: Shoreline Zone. These detailed policies contain much more specific tests against which proposals can be assessed.	The Minister notes the qualified support for this policy but is not minded to amend the draft Plan as the issues raised are already adequately addressed
DP495		Mr Paul Harding	The Association of Jersey Architects	Policy SP 1	Spatial Strategy	Neither	We support the principles of the Spatial Strategy but point out the 'hierarchical sequence' fails to recognise - a) The importance of the existing western Built-Up area of St Brelade / St Peter, the amount of existing housing provided within this area, and it's potential for co-located living, working and leisure. b) The contribution that intensifying use of the existing Built-Up areas can		Reject	The Plan already makes reference to the potential for the western areas of the Island's Built-up Area to contribute towards the Island's development needs. Map 2.2 identifies the Red Houses/ Les Quennevais area as a secondary urban centre in the hierarchy of	The Minister notes the comments made but is not minded to amend the draft Plan as the issues raised are already addressed

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							make towards our future built environment requirements. We will return to this later when addressing the major issue raised by the 2009 Draft Plan proposal to significantly contract the Built-Up area. We therefore submit Policy SP1 requires amending to take account of these considerations.			settlements, which gives support to its significance in the Island. The role of the BUAs to contributing towards the Island's housing needs is already recognised. Indeed, it is relevant to note that windfall development, which is largely the result of the redevelopment of existing developed sites within the BUA out with St Helier, is envisaged as contributing the largest proportion of housing supply over the Plan period (see table 6.2)	
DP50		Mr Stephen de Gruchy		Policy SP 1	Spatial Strategy	Supporting	Support with Caveats I think that paragraph 3 is not tight enough. It could be argued that any development would "justifiably support parish communities" e.g. more people to spend money in the local shops, pub, etc. In view of the importance of protecting Greenfield land, I would support paragraph (c) only if approvals there under required in-principle consent from the States Assembly.		Noted	Note qualified support, but this is a strategic policy and any proposals for development which supports rural parish communities will need to be tested against, most probably, detailed Village Plans, as set out in Proposal 14. The policy also makes reference to evidence of need which seeks to ensure that there is some objective analysis of the potential demand for and benefit of the proposals. The law enables the Minister to develop and adopt supplementary guidance and it is proposed that this is done so for proposals which emerge from this element of the Plan, following due process with regards to public consultation and engagement with key stakeholders. It remains within the gift of the Minister to refer any such matters to the States should they be inclined to do so.	The Minister notes the qualified support for this policy but is not minded to amend the draft Plan
DP513		Mr Paul Harding	The Association of Jersey Architects	Policy SP 1	Spatial Strategy	Neither	The Island Plan needs a clear statement along the lines of '...Medium to high?density redevelopment within ALL Built-Up Areas will be encouraged and supported, where it is not considered detrimental to the amenities of the area... etc..'. This will require a complete rethink of the planners' normal rules and pre?conceptions about appropriate scales and heights etc. in these out?of?town locations, although issues of overlooking and overbearing impact must continue to be important considerations. It is also vital that other newly proposed policies, such as those relating to 'skylines	Not everyone wants to live in a town centre, even a rejuvenated one:? There is enormous scope for creating large numbers of new, good?quality apartment housing within the better, out?of town locations that lie within the existing BUAs (Eg: along Victoria Avenue etc). However, this will only be possible, and economically viable, if it is accepted that the concentration of all housing within the BUA can only be achieved by redeveloping existing sites within these areas to a much higher density and that this will be supported by P&E. The 2009 Draft Plan accepts	Reject	Whilst the Spatial Strategy seeks to focus development efforts on the regeneration of St Helier - because this is the most sustainable location to provide for the island's future development needs - this is not to the exclusion of over parts of the Built-up Area, in accord with the hierarchy of settlements identified in the draft Plan (at 2.23 and Map 2.2). The proposed	The Minister is minded to reject the comments made as the issues raised are already adequately addressed in the draft Plan

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							and vistas', 'sustainability (ie: presumption that existing buildings are to be retained)' and 'conservation zones', etc. are not allowed to interfere with or obstruct the general need to achieve higher densities.	the above within St. Helier but appears to see little scope within the remaining Built-Up Areas apart from small-scale conversions and in-fills. We submit if the above is in some way embraced within the new Island Plan then an opportunity will exist to achieve the objective of creating large numbers of desirable apartment homes without further erosion of the countryside.		policy regime which seeks to secure an increase in the density of development is not specific to the town of St Helier. It is also relevant to note that the largest source of housing supply identified in the draft Plan, at table 6.2, is from 'windfall development', which largely comprises the redevelopment of existing Built-up Area sites out with the Town of St Helier.	
DP544		Mr Paul Harding	The Association of Jersey Architects	Policy SP 1	Spatial Strategy	Objecting	In its current guise the policies concentrating and intensifying development in St Helier is too dogmatic. It risks creating a whole new set of demographic and sociological problems. We need to look harder at edges of the Built-Up area and brown-field sites. There has to be a more balanced approach. The AJA submits there is potential for a Multi-Centric approach to the Built-Up Area, where distinct neighbourhoods are identified (within St Helier and elsewhere within the Built-Up Areas) and contain:- a) Distinct neighbourhoods within the Built-Up areas are identified. b) Each would be 10/15 minutes walk in any direction, to give an accessible size on foot. c) Each would have at least one public Open Space. d) All will be connected with public transport links. e) Each will have a viable mix of uses including shops, offices, other employment uses and housing. f) Adequate public / private transport and parking provision including car-share and bicycles. g) Strategy for enhancing public realm space and character qualities. 10.8 We propose that serious consideration need to be given to :- a) Rationalising the built-up area boundaries, and b) Consolidating the built-up area boundaries, and c) The benefits of appropriate reclamation. It is Jersey's tradition to reclaim land for our built environment requirements.	The 2009 Draft Plan recognises the Plan is unlikely to make proper provision for Islanders housing needs, warning in para 4.10 (bold type as used in the Plan) that "It needs to be clearly recognised, however, that unless land in the Built up Area is developed at higher and more land efficient densities than have previously been achieved, in accordance with the strategic policies of the Plan (Policy SP 2 'Efficient Use of Resources'), it will not be possible to meet all the Island's identified needs, particularly for housing, without reviewing the need to release greenfield sites for development during the Plan period." This indicates the density of development within Built-Up areas will have to dramatically increase to satisfy the Plan policies, overcoming other policies within the 2009 Draft Island Plan such as building height, Green Backdrop and skyline. The concentration and intensification of all development within St Helier risks further polarising serious social divides (the have's in country houses with have not's in dense urban areas) and causing harmful damage denying our younger locals the opportunity of ever owning their own home. This approach was tried out in the 1960's with the urban high-rise developments, resulting in social problems. There are glyph maps incorporated into the 2009 Draft Plan for virtually all demarcated zones / areas, except one delineating the proposed Built-Up area extent. This is contained within the stakeholder's presentation and the lessons we learn from it are so important we reproduce it. It is apparent, although the principal Built-Up areas within the Island extend across large parts of the south coast, they actually form a small proportion of the Island's land extent. By a large margin Jersey substantially retains its countryside and green, natural spaces. It is also equally apparent the Built-Up area is quite fragmented in places and in other locations rather irrational. Although regenerating	Reject	The proposed spatial strategy is balanced in that it seeks to focus the Island's development needs to the existing Built-up Area, which is not solely focused on St Helier but which relates to all parts of the Island, set out in Map 2.2; it seeks to make use of some limited brownfield land on the edge of the existing BUA to provide for affordable family homes; and it also recognises the potential for the development of new sites in some of the Islands northern rural parishes, as set out at Proposal 14: Village Plans. It is also relevant to note that proposals to regenerate St Helier, whilst residentially-led, also recognise the need to ensure that the facilities and amenities required to engender good quality urban living, such as open space, are identified and the subject of policies and proposals to ensure their provision and enhancement.	The Minister notes the comments made but is not minded to amend the draft Plan

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								St Helier is an admirable objective it cannot be the only answer to stack up the housing in Town with increased density. This is not the answer to every built requirement. We know young Jersey persons aspire to a conventional home with garden and if this cannot be achieved on the Island they are prepared to leave Jersey for other shores. This is undoubtedly not good for our future.			
DP600		Mr Paul Le Claire		Policy SP 1	Spatial Strategy	Objecting		I am concerned that too much development is for town whilst on the edges of town things are turned down due to visual impacts Notably the amendment I bought to the last plan (I may have to bring it and others if there seems to be insufficient housing provision.)	Reject	The sequential approach to development adopted in the draft Plan, seeks to focus development activity in the Town of St Helier, as defined at Map 2.1, but not to the exclusion of other parts of the Built-up Area throughout the Island which, it is recognised, has the potential to contribute to much of the Island's development needs and which is identified as providing a large proportion of the Island's housing supply over the next 10 years (see table 6.2: Sources of housing supply)	The Minister is not minded to accept the comments made as they are already adequately addressed in the draft Plan
DP605		Mr Bruce Willing		Policy SP 1	Spatial Strategy	Objecting		In September 2008 the "Imagine Jersey 2030" consultation exercise identified the demographic reality that Jersey's birth rate is in decline, that our population is living longer and that this combination will place an increased economic burden on the Island due to accelerating health care and welfare provisions. To meet this reality and the economic challenges associated with it, the choices discussed were whether the States should: Raise taxes Extend people's working lives Increase the working population If the working population was increased the consultees were asked to decide where best this increase in population could be accommodated - in town, or in the countryside? This consensus forms the strategic background to the DIP. However, given that the socio-demographic make-up of the consultes was largely 'white-collar', it is not surprising that the overwhelming vote was to concentrate on St Helier and not re-zone more fields in the countryside. Therein lies the first and most basic flaw in the DIP.	Reject	The Imagine Jersey event is but one material consideration in the development of the draft Plan and the Spatial Strategy adopted is based on a much wider consideration of evidence and opinion than just that, and is considered to represent a sustainable approach to meeting the Island's development needs, as set out in the draft Plan.	The Minister is not minded to amend the draft Plan
DP607		Mr Bruce Willing		Policy SP 1	Spatial Strategy	Objecting	St Helier should not be exclusively thought of as the only urban area to be focussed on for future development. The conurbation of Quennevais/St Aubin and the Airport/St Peter's Village needs particular attention as an additional development area There needs to be some recognition of the potential for some of the larger 'brownfield' sites	Sustainable Development and Spatial Strategy The desire for sustainable development is clear and entirely reasonable, as is the Spatial Strategy that supports it, but it does not go far enough and ignores the existence of large potential 'brownfield' sites (Presumably for commercial reasons as to do so would unnecessarily raise their	Reject	Brownfield Sites: the Spatial Strategy clearly sets out an hierarchical approach which, whilst focusing on the existing Built-up Area (and not just St Helier) acknowledges the role of edge of BUA brownfield land,	The Minister is minded to reject the comments made as the issues raised are already adequately



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							<p>within Jersey and for the need for further reclamation within the DIP if the aspirations for the cohesive development of St Helier, in particular, are to be met. The stated key to the DIP is the transfer of emphasis to providing new homes in the St Helier area. Focussing almost exclusively on redeveloping St Helier, as the exclusive answer to the island's forward accommodation needs, is not going to deliver this.</p>	<p>commercial value.) and reclamation (Presumably for political reasons as this is a politically sensitive area.). Brownfield Sites: The largest potential site in Ronez Quarry, which with its direct access to the sea, an existing small harbour, and its ability to 'hide' developments within the deep quarry site, must offer a potential site for the development of infrastructure (sewage, reclamation, electricity, etc as well as heavy commercial activities. It has heavy-duty roads, which support its current activities and there is an understanding of its finite capacity to continue as a granite quarry. There needs to be a plan for its future exploitation as a 'commercial' site, one which will allow much more valuable land on the south coast, in St Helier, to be better exploited for urban use. Reclamation: Presumably, following the furore about the proposed reclamation of land at St Aubin, there is no clear presumption of further reclamation in the DIP. This ignores historical reality. The area from the Town Church, east along the Esplanade; Victoria Avenue and the coast road from the Royal Grouville Golf Club to Gorey are all reclaimed land, yet few people in Jersey would recognise that. These areas represent a small part of the land that has been reclaimed throughout history and, in particular, in the last 150 years. It is a major error within the DIP that there is no recognition of the need for further reclamation, particularly as this is already a part of various plans for St Helier, including the aspiration of the Harbours Department for the redevelopment and expansion of the port of St Helier. Without this recognition it is very difficult to see how the overall aspirations for the built environment can be met within the DIP. Town and Countryside The political view appears to be: "people can't have their cake and eat it - if we do not want more development in the countryside, then people will have to get used to the idea of living in St Helier.... "European-style apartment living" However, it might be that those saying "no more development in the countryside" are mainly those already living there? Therefore, although regenerating St Helier with residential developments is a sustainable and good thing to do, St Helier cannot be the answer to everything. Young Jersey families will aspire to a conventional rural home and may be prepared to leave the Island if they cannot have one. This, surely, would not be good for Jersey? Whilst the DIP very responsibly aims to concentrate on St Helier rather than indiscriminately re-zoning endless green fields, in its current form it is too dogmatic. It</p>		<p>which form the basis of most of the proposals to rezone land for the provision of affordable family homes. Ronez Quarry is not a vacant brownfield site but an active commercial operation that undertakes an important role in supplying the Island with aggregates, and which will continue to do so over the lifetime of the Plan, as set out in Chapter 9: Supply of Aggregates (p.379) Reclamation: there is a clearly stated presumption against further land reclamation in the draft Plan, as set out in Policy NE5: Marine Zone, and the reasoned justification for it (see 2.52) A more balanced spatial strategy is needed: the proposed spatial strategy is balanced in that it seeks to focus the Island's development needs to the existing Built-up Area, which is not solely focused on St Helier but which relates to all parts of the Island, set out in Map 2.2; it seeks to make use of some limited brownfield land on the edge of the existing BUA to provide for affordable family homes; and it also recognises the potential for the development of new sites in some of the Islands northern rural parishes, as set out at Proposal 14: Village Plans</p>	<p>addressed by the draft Plan</p>

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								needs to look harder at edge of town sites, brown field sites and glasshouse sites and test whether they can be suitably developed into family homes as well. It also needs to recognise the outlying urban centres, in particular the conurbation of Quennevais and St Aubin, including the Airport, as an alternative to the concentrated development of St Helier. A more balanced approach is needed.			
DP630		Richard Plaster	Jersey Electricity plc	Policy SP 1	Spatial Strategy	Supporting		The full consequences of the Island Plan on the electricity supply will only become clear once planning decisions are taken over the whereabouts and type of future developments. Having reviewed the various options, we believe we would be able to supply an electricity infrastructure to the options without significant capital expenditure over and above that already planned. This will enable us to continue to provide affordable, low carbon energy to the Island's domestic and commercial sectors, and to support the projected population increase	Noted	Noted	Support is noted by the Minister
DP725		Paul Harding	The Association of Jersey Architects	Policy SP 1	Spatial Strategy	Supporting	4.2 We support the principles of the Spatial Strategy but point out the 'hierarchical sequence' fails to recognise - a) The importance of the existing western built-up area of St Brelade / St Peter, the amount of existing housing provided within this area, and it's potential for co-located living, working and leisure. b) The contribution that intensifying use of the existing built-up areas can make towards our future built environment requirements. We will return to this later when addressing the major issue raised by the 2009 Draft Plan proposal to significantly contract the built-up area. We therefore submit Policy SP1 requires amending to take account of these considerations. Reduce, Manage, Invest 4.3 Paras 2.29 - 2.33 contains a lot of 'management jargon' without appreciating demand for development, energy, water, travel is driven by population policy. Development only results from the population's needs and demands, not the other way round. We reject the suggestion development creates 'waste', in many cases development reduces waste of resources such as energy by creating more highly insulated buildings. However we support Policy SP2 as written.		Noted	The importance of the existing western built-up area of St Brelade / St Peter 'hierarchical sequence': this area is embraced in the second bullet of the hierarchical sequence and its potential is thus considered to be adequately recognised; The contribution that intensifying use of the existing built-up areas can make towards our future built environment requirements: this is explicitly acknowledged at 2.23, 2.36 and is supported by Policies SP1 and SP2. It is also relevant to note that the contribution of windfall development (development out with the Town of St Helier) to housing supply over the Plan period is considered to be significant, as set out in table 6.2	The Minister notes the comments made but is not minded to amend the draft Plan as the issues raised are already adequately addressed
DP804		Mrs Susan Kerley		Policy SP 1	Spatial Strategy	Supporting	I endorse the suggestions and comments made by the National Trust for Jersey on these policies and proposals		Noted	Noted	Support is noted by the Minister
DP913		Mr James Godfrey	Royal Jersey Agricultural & Horticultural	Policy SP 1	Spatial Strategy	Supporting	Spatial strategy: The preservation of 'green field' land is of the highest importance and therefore alternative solutions need to be found for any real, and realistic, demand for accommodation. This supply should come from either urban 'brown field' sites, existing redundant agricultural buildings		Noted	Noted	Support is noted by the Minister

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			Society				where they are of the traditional type incompatible with the needs of modern agriculture or more efficient use of existing sites within the urban area.				
DP969		Mr. Maurice DUBRAS		Policy SP 1	Spatial Strategy	Supporting	Spatial Strategy SP1 - while I have supported the general approach of late in this regard, I urge you to continue not to be seduced by allowing the so-called built-up areas outside of the present larger communities to turn into 'ribbon' development within the countryside. I agree with the notion of maintaining the northern parish 'village' communities and their sustainability. While minimal encroachment on the countryside may be justified, it is with great optimism that I have returned from holidaying in New Zealand and Canada to find that more and more fields have been planted this winter/spring than five years ago.		Noted	Noted	The Minister notes the qualified support for this policy
DP550		Deputy John Le Fondre			Efficient Use of Resources : Energy, Land and Buildings	Supporting	Higher densities - there may well be specific reasons why any one example is not appropriate, however in urban areas, there have been occasions when it has seemed to me that there was a reluctance to embrace higher densities. I would assume that higher densities would normally infer apartments rather than houses, and possibly higher buildings. This (to me) seems the right way to go, provided that the spatial standards are sufficient for a good quality of living. Therefore in my view the Spectrum development (Gloucester Street) has relatively poor spatial standards, although the concept may well have been in the right direction. The question will be how the department marries up the desire for higher densities (assuming this means higher buildings) against the apparent desire to be consistent with existing housing in the vicinity. Especially given that this plan is (rightly) focussed on providing solutions on brownfield sites.		Noted	The support for this policy is noted. The Plan makes it clear, at 2.36, that existing densities and styles of development in, for example, suburban areas of the Island, need necessarily constrain the redevelopment of existing buildings, in terms of their architectural form and/or the density of development on a particular site.	The Minister notes the qualified support for this part of the draft Plan
DP496		Mr Paul Harding	The Association of Jersey Architects		Reduce, Manage, Invest	Objecting	Paras 2.29 - 2.33 contains a lot of 'management jargon' without appreciating demand for development, energy, water, travel is driven by population policy. Development only results from the population's needs and demands, not the other way round. We reject the suggestion development creates 'waste', in many cases development reduces waste of resources such as energy by creating more highly insulated buildings.		Reject	The policy seeks to recognise, as a strategic principle, that every effort should be made in the development process to minimise the demands made upon natural resources and that there is a hierarchical approach to dealing with this issue as set out in the policy and the justification for it.	The Minister notes the comments made but is not minded to amend the draft Plan
DP364		Mr Paul Garlick		Policy SP 2	Efficient Use of Resources	Objecting	Jersey Gas are of the opinion that the Island Plan's view of the carbon footprint assigned to imported electricity should not be informed from the Energy Policy Green Paper (September 2007) reference 2.35 of the Draft Island Plan. The carbon intensity assigned to imported electricity should reflect the ultimate global carbon dioxide emissions resulting from its use, no matter in which jurisdiction the emissions occur.	It appears that the decisions taken to achieve the above objectives will be informed from the document "Fuel for Thought Energy Policy Green Paper (September 2007)". This document infers that imported electricity has extremely low levels of carbon dioxide emissions, as indicated by assigning a carbon intensity of 0.056 kg of CO2/kWh, this figure is practically zero. In assigning such a figure the Energy Policy Green	Reject	The respondent makes many detailed and technical challenges to information that is not presented in the Island Plan Green Paper and that are not relevant to this review. There is considerable discussion with all the fuel industry stakeholders in the ongoing development of the	The Minister is not minded to amend the draft Plan

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								Paper would intend to promote grid electricity for heating purposes under the perception that it is low carbon. In doing so it will act to undermine incentives to reduce electricity demand, employ conservation measures and utilise real low carbon technologies e.g. heat pumps, solar, CHP, biomass, biogas etc. Such a view will also promote electricity for heating purposes above other conventional fuels such as gas and heating oil under false pretences. Jersey Gas is of the opinion that imported electricity should be assigned a carbon intensity that better represents the ultimate effect of global carbon dioxide emissions resulting from its use. As an example, ADEME/RTE declared carbon intensity for electricity heating in France of 0.5 kg to 0.6 kg of CO2/kWh which reflects that heating load is predominantly met from marginal generation capacity (not base load capacity) and that European marginal generation capacity is predominantly from hydrocarbon power stations. Note ADEME are a French energy/environment consultancy and RTE are an independent company within EDF whose duty it is to balance the French grid system. As one can see from the above, the Island's Energy Policy Green Paper's view of imported electricity for heating purposes is significantly different to that of the company that operates the French electricity grid system. Hence our concern is that the Draft Jersey Island Plan is being informed incorrectly as to the actual carbon footprint of electricity.		Energy White Paper of which the Jersey Gas Company is fully involved. These discussions are considering the assertion by Jersey Gas that the department should not accept the legally declared carbon intensity of electricity supplied to Jersey by EDF. The respondent is incorrect in asserting that the forthcoming Energy White Paper will promote fuel switching to electricity. These issues are better dealt with in the context of the Energy White Paper as are the potential challenges in realising utility scale renewable energy for Jersey. The Island Plan simply provides a spatial planning framework within which to consider applications for renewable energy installations should they come forward over the lifetime of the Plan.	
DP422		Mr Marc Burton	Institute of Directors	Policy SP 2	Efficient Use of Resources	Supporting	the IoD would like to support the need to build higher in town to maximise brownfield sites in St. Helier. See attached letter	To offer good urban living to suit the younger generations and allow them the opportunity to get on the property ladder; See attached letter	Noted	Noted	Support is noted by the Minister
DP444		Mr Charles Alluto	The National Trust for Jersey	Policy SP 2	Efficient Use of Resources	Supporting	The Trust fully endorses and very much welcomes the efficient use of resources and the sequential approach to development.		Noted	Noted	Support is noted by the Minister
DP497		Mr Paul Harding	The Association of Jersey Architects	Policy SP 2	Efficient Use of Resources	Supporting	we support Policy SP2 as written		Noted	Noted	Support is noted by the Minister
DP51		Mr Stephen de Gruchy		Policy SP 2	Efficient Use of Resources	Supporting			Noted	Noted	Support is noted by the Minister
DP595		Deputy John Le Fondre		Policy SP 2	Efficient Use of Resources	Neither	Density - bearing in mind that the Island Plan will still take some time to be approved, what is the position during the interim period ? I fully support the principle of higher densities (on brown field		Noted	The 2002 Island Plan will remain in force until the new Plan is adopted by the States. The sites referred to have been or will be	Noted by the Minister

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							sites), and my department is / will be bringing forward plans in relation to Bellevue, JCG and South Hill. What guidance will be given to Planning Officers in the interim period, as these sites would have the potential of providing quite high density housing, but of a good quality ?			the subject of development briefs to inform the specific development of these sites.	
DP616		Jason Simon	Simon Sand & Gravel	Policy SP 2	Efficient Use of Resources	Objecting	Comments were invited on the Strategic Policy Framework and in particular Policy SP2. I have previously commented on the Islands current endeavours to reduce the use of natural resources and the positive effect this has on increasing the life of the locally available resources. My opinion is that Policy SP2 doesn't strongly enough encourage the use of local resources as doing so will greatly benefit us all whilst there is resource available.		Noted	Given the environmental implications of transporting resources to the Island, it is considered to be implicit within the policy that the use of local resources has the potential to be more efficient. This issue is, however, related more to matters of transportation and procurement policy than land use planning policy.	The Minister notes the comments made but is not minded to amend the draft Plan
DP806		Mrs Susan Kerley		Policy SP 2	Efficient Use of Resources	Supporting	I endorse the suggestions and comments made by the National Trust for Jersey on these policies and proposals		Noted	Noted	Support is noted by the Minister
DP552		Deputy John Le Fondre			Sequential Approach to Development	Supporting	Para 2.40 - Town Centre - reference is made on a number of occasions to protecting the primary retail core of St Helier (see comment later below). It is certainly the case that we are in the middle of an economic downturn, and I also suspect that the internet is having an impact upon retailers. Thus whilst a capacity study has been performed by DTZ, it is (I believe) a little out of date, particularly as regards present economic conditions. To me the jewels in the crown of St Helier are the areas immediately around the Royal Square, the Central Market (including the Fish Market) and of course King Street, Queen Street, Broad Street and West's Centre. As I presently walk through Town there are a number of premises that are becoming vacant. Whilst some of these are peripheral, there is one or two starting to become vacant in Beresford Street. To me this is starting to erode the heart of the core retail centre, and I would be extremely concerned if the result of present policy shifted too great an emphasis away from the centre towards (say) the Waterfront. It would be extremely ironic if the impact was to leave us with reduced footfall in St Helier, with the Central Market no longer being viable, and leaving the States with yet another deteriorating asset on its hands. There are also potential concerns over the viability of Blockbuster, which in conjunction with the Odeon / Le Masurier sites and the increasing vacancies in Britannia place will leave a vast swathe of Bath Street empty. I therefore remain extremely concerned over the impact of new retail units included within the Esplanade Quarter upon the heart of St Helier. I		Noted	Noted	The Minister notes the qualified support for this part of the draft Plan



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							have recently visited Liberty Wharf and was very impressed by the likely quality of the finished product. Hopefully that in it will not have too great an impact upon the main centre of town, but there must be a limit as to how many more new retail offerings, and (say) how many new restaurants and coffee shops St Helier can cope with. It seems that our Town is becoming more and more similar to any UK street. Whilst no business has the right to be free of competition, we do sometimes seem hell bent on attracting new, non Jersey businesses into the Island, without considering whether existing businesses can be encouraged in the desired direction first. In my view the impact of Liberty Wharf, the current economic climate, and the impact of the internet should be re-assessed before the fairly significant additional retail (and restaurant etc) offering at Esplanade Quarter are implemented. In the event that there is potential over capacity I would suggest that these potential new units should be converted to residential instead.				
DP905		mr daniel wimberley			Sequential Approach to Development	Supporting		Emphasis on resource efficiency as embodied especially in the mantra of Reduce, Manage, and Invest as set out in paras. 2.38 and following, and as for example embodied in the policy of encouraging the re-use of buildings rather than their demolition.	Noted	Noted	Support is noted by the Minister
DP1028		Ray Shead	The Jersey Chamber of Commerce	Policy SP 3	Sequential Approach to Development	Objecting	The Planning Department's overall policies are not linked. If the aim is to reduce the overall carbon footprint of the Island, which includes reducing traffic/trips to work and so on, there needs to be a consideration of changing how residents live and work. Therefore, if the majority of trips are to and from work and shopping, these need to be near where people live, thus reducing trips into the town centre. A relaxation in the location of offices should be reviewed. The Draft Island Plan seeks to locate "most new residential, retail and office development in the Town of St Helier to ensure delivery of the New St Helier Waterfront". This raises a number of points:- The future of the Waterfront is still very uncertain; Any work in connection with the Waterfront i.e. architecture, consultants will probably given to non residents; It is all well and good to write a policy for St Helier but how can the Planning Department be rigid in its implementation when the recent North of St Helier Master plan clearly shows that most of the sites are in private ownership.		Reject	Integration of policy: the Spatial Strategy and the Sequential Approach, set out in Policies SP1 and SP3 and entirely consistent with the objective of seeking to reduce the need to travel by seeking to ensure that most of the Island's development needs are met from within those parts of the island where the majority of the population already lives. Relaxing policy related to the location of offices would not support this objective. Catalyst: the planning policy framework provided by the Island Plan and also by complementary master plans, such as that for the North of Town, can enable and encourage the release of land for development, irrespective of their ownership, by creating certainty and clarity for developers about the planning objectives for a particular area;	The Minister is not minded to amend the draft Plan

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										Waterfront: the potential development of the Esplanade Quarter remains to be determined in relation to the existing planning framework for the area, as set out in Policy BE2. Clearly, developments of other parts of the Waterfront (e.g. Castle Quays) are progressing. The engagement of professionals in the development of proposals for the Waterfront will be a matter for the developer.	
DP445		Mr Charles Alluto	The National Trust for Jersey	Policy SP 3	Sequential Approach to Development	Supporting	The Trust fully endorses and very much welcomes the efficient use of resources and the sequential approach to development.		Noted	Noted	Support is noted by the Minister
DP52		Mr Stephen de Gruchy		Policy SP 3	Sequential Approach to Development	Supporting			Noted	Noted	Support is noted by the Minister
DP553		Deputy John Le Fondre		Policy SP 3	Sequential Approach to Development	Supporting	The policy seems logical - however 2 comments : a) as regards my remarks immediately before this paragraph it would seem to me that the sequential approach would preclude the level of retail development presently envisaged for the Esplanade Quarter. b) Although I am not in favour of greenfield development, there are some examples I can think of where existing buildings within the green zone might be likely to be replaced in the next 5 to 10 years, with scope to generate 2 or 3 units without any adverse impact upon the locality, and without actually breaching the principle of not building on a greenfield site. It would seem to me that where there is no objection to such development (for example from the Parish), then policy SP3 should not be used to prevent such development, particular when there might be an incremental benefit to the overall housing stock of the Island. There will always be a subjective element to this, however it needs to be applied flexibly. Please note this is only in respect of small scale opportunities, perhaps in respect of less than (say) 5 units., and this is effectively in respect of brown field sites, but those which happen to fall within the green zone. c) As a layman I would tend to take the view that is a site already has a building on it, particularly if it is beginning to deteriorate, I would generally rather have a better quality building (well designed etc), and if this means that the footprint is larger, or the building is taller, then		Noted	Esplanade Quarter: the proposed provision of retail floorspace for the Esplanade Quarter is set out in the Masterplan for the area and proposals for the development of this site will be considered against Policy BE2 and the approved Masterplan for the area; Green Zone: the re-use and redevelopment of existing buildings in the Green Zone will be considered relative to the set of exceptions set out in Policy NE7.	The Minister notes the qualified support for this policy

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							so be it. In my view that is not the same as supporting green field development. Therefore the policy towards development within the green zone in my view needs some flexibility within it, specifically for small scale redevelopments of brown field sites within that zone.				
DP726		Paul Harding	The Association of Jersey Architects	Policy SP 3	Sequential Approach to Development	Objecting	Policy SP3 similarly needs amending to recognise and incorporate; a) The importance of the existing western built-up area of St Brelade / St Peter, the amount of existing housing provided within this area, and it's potential for co-located living, working and leisure. b) The contribution that intensifying use of the existing built-up areas can make towards our future built environment requirements. We will return to this later when addressing the major issue raised by the 2009 Draft Plan proposal to significantly contract the built-up area. We therefore submit Policy SP1 requires amending to take account of these considerations. Reduce, Manage, Invest		Reject	The role of the Built-up Area outside St Helier in contributing to the Island's development needs is recognised in the draft Plan and given due weight. The Red Houses/ Les Quennevais area is clearly recognised as a secondary urban centre (see map 2.2) reflecting the level of services and development in this part of the island. The potential contribution of land out with St Helier to housing provision is recognised in the draft Plan (see table 6.2) and the development of employment related activities in these areas is supported by a range of policy and proposals including Proposal 12: Airport Regeneration Zone; EO2; EO3; ER3; ER4; ER5; EIW3; EVE1 and EVE2	The Minister is not minded to amend the draft Plan as the issues raised are already adequately addressed
DP808		Mrs Susan Kerley		Policy SP 3	Sequential Approach to Development	Supporting	I endorse the suggestions and comments made by the National Trust for Jersey on these policies and proposals		Noted	Noted	Support is noted by the Minister
DP923		mr daniel wimberley		Policy SP 3	Sequential Approach to Development	Objecting	Why is SP3 so restrictive- REC that shopping and employment opportunities be explicitly allowed, as with a dog-bone pattern of transport needs, public transport will benefit greatly as people travel both		Reject	Policy SP3 is consistent with the proposed Spatial Strategy of the draft Plan which seeks to ensure a more sustainable pattern of development in the Island and to protect employment-related land uses and buildings	The Minister is not minded to amend the draft Plan
DP446		Mr Charles Alluto	The National Trust for Jersey		Protecting the Natural and Historic Environment	Objecting	Historic Environment 2.53 The Trust endorses the approach that conservation and sustainable economic growth can be complementary objectives and fully recognises that buildings need to adapt over time and this needs to be managed appropriately. However, the Trust cannot support the suggestion that economic prosperity will only be able to secure the continued use and maintenance of historic buildings, provided that there is a sufficiently realistic and imaginative approach to their alteration and change of use, to reflect the needs of a rapidly changing world .	Without doubt this statement lacks rigour, justification and definition, and will be vulnerable to a vast array of interpretation which could undermine the protection of our historic environment in the longer term. It is also a one sided point of view in the sense that 2.53 fails to recognise that the historic environment has and continues to be a key stimulant for economic regeneration and growth, as outlined in 4.24., 4.25 and 4.26	Noted	The comment is noted but it is considered that the intent of Policy SP4 is clear in the priority afforded to the protection of historic fabric, which is further supported by detailed policies at HE1-HE5	The Minister notes the comments made but is not minded to amend the draft Plan
DP499		Mr Paul	The		Protecting	Supporting	The AJA fully supports the Policy and supporting		Noted	Noted	The Minister

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		Harding	Associati on of Jersey Architec ts		the Natural and Historic Environm ent		text, while pointing out a balance needs to be found between our built and natural environments.				notes the comments made and the support for this part of the draft Plan
DP673		Mrs Sue Lissenden			Protecting the Natural and Historic Environment	Supporting	2b Very pleased that the message from the public concerning the importance of maintaining a good environment, and keeping the rural spaces free from buildings, have been included; but see 2c. below. 2c. Very pleased that you have addressed the issues pertaining to heritage; it is an important element of the cultural estate and informs the identity of the island.		Noted	Noted	Support is noted by the Minister
DP839		Mr Rod Mccloughlin			Protecting the Natural and Historic Environment	Objecting	The emphasis given to the extent to which local identity is dependent on the physical environment is welcomed, as is the importance given to the historic environment and the extent to which conservation and sustainable growth can be seen as complementary, rather than oppositional. It is suggested that at 2.54 consideration might be given to removing the final clause 'except where a convincing case can be made for alteration or demolition'. This is implicit in what precedes and follows it, and serves to weaken the force of the wider context given the imprecision implicit in the notion of a 'convincing case'. It also sits unconvincingly with the details of section 1.8 and 1.9 of General Development Control Policies relating to demolition and replacement of buildings.		Reject	For demolition to be considered acceptable under the terms of Policy GD2, a convincing case must be put forward as set out in the policy, hence the qualification at 2.54 is not considered to particularly problematic	The Minister is not minded to amend the draft Plan as proposed
DP398		Mr Nicolas Jouault		Policy SP 4	Protecting the Natural and Historic Environment	Supporting	The Island should work in conjunction with the other Channel Islands and France (in respect to Chausey) and apply for World Heritage status through the marine programme of UNESCO, this would be in conjunction with the current work undertaken by the working party looking at a pan Island application in the historical context. Create an educational and multi disciplinary research centre for the marine environment such centres are established in Brittany where Roscoff and Brest have an International reputation in their fields of work. A Jersey centre would also cover a lot of the recording and monitoring of marine life which is very lacking at present. The Island was once well known as a research base under the auspices of private individuals Sinel and Hornell. 50% of Islands waters to become "No Take Zones"	For the island to gain recognition as an area of International importance for marine conservation it needs to be forward thinking above and beyond other national programmes. For example Durrell is known for its work almost solely in the field of conservation which is the reason for its success. My suggestion would combine with the ethics and motives of Durrell and would perhaps enhance the Island as a centre of excellence in the field of conservation, we need to lead not follow and make the most of what attributes the Island offers in this area. The Island has a marine habitat of International impotence please treat it as such.	Noted	The comments made are noted but are not material to land use plan	The Minister notes the qualified support for this policy
DP53		Mr Stephen de Gruchy		Policy SP 4	Protecting the Natural and Historic Environment	Supporting	Support with caveat To emphasis the importance of protecting the natural and historic environment, I would wish to see, "A high priority ..." changed to, "A very high priority..."		Noted	It is clear that the Minister will give weight to this matter as a material consideration and the extra emphasis is not considered to be necessary	The Minister notes the qualified support for this policy but is not minded to amend the draft

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					ent						Plan
DP700		Mr Mark Syvret	Romerils		Economic Growth and Diversification	Supporting	We support the comments made [Page 47; sections 2.55 and 2.56] with regard to the difficult economic conditions and the deteriorating outlook which will cover at least the early life of this (Draft) Island Plan.	The current period in which we are trading is sufficiently tough that for many businesses it will simply be a case of survival or not and it is heartening to note that "the island needs to create conditions where existing business... can survive and ultimately thrive..."	Noted	Noted	Support is noted by the Minister
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
DP420		Mr Marc Burton	Institute of Directors	Policy SP 5	Economic Growth and Diversification	Supporting	When reviewing brownfield sites, we would also like consideration given to other areas within our economy other than housing i.e. commercial use e.g. data centres, technical/light industrial park or even for a Business School/University.	This will assist in the diversification of our economy and allow other industries to emerge and for Jersey to continue developing a high tech economy;	Noted	Policy SP5 contains within it, at (1.) and (2.), the presumption that the redevelopment of any employment related land will be for employment-related purposes	The Minister is not minded to amend the draft Plan as the issue raised is already adequately addressed
DP54		Mr Stephen de Gruchy		Policy SP 5	Economic Growth and Diversification	Supporting			Noted	Noted	Support is noted by the Minister
DP856		Gerald Fletcher	Jersey Hospitality Association	Policy SP 5	Economic Growth and Diversification	Objecting	One means of modifying Policy SP5 would be to include a further sub-section which positively supports the tourism industry, by releasing it from the otherwise restraining character of the preceding sub-sections. This might be expressed as follows: A high priority will be given to the maintenance and diversification of the economy and support for new and existing businesses, particularly where development can attract low footprint high value business from elsewhere and foster innovation, in the following ways: 1. the protection and maintenance of existing employment land and floorspace for employment related use; 2. the redevelopment of vacant and underused existing employment land and floorspace for new employment uses; 3. the provision of sufficient land and development opportunities for new and existing employment use. 4. by adopting a flexible and supportive approach to the reuse of existing employment land for commercial, residential and other purposes in cases where: a) this 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, for example development serving tourism objectives, as envisaged in Objective EVE1, or b) the tourism operator in question wishes to exit the industry.	I enclose a submission prepared by MS Planning on behalf of the Association which sets out the concern of our membership on certain aspects of the draft Plan. Of particular concern are Policies SP5 and E1, which seek to control the use of employment land. This is very similar to the 'key sites' policy that was abandoned some years ago, which effectively halted investment in the hotel sector for many years. A return to such harsh controls will be damaging in terms of morale and investment in the industry. I trust that these matters will be taken into account by the independent Inspector and that an opportunity will be given for our members to amplify these views during a public examination of the Plan. The Association is preparing a paper which will provide supplementary information in support of the enclosed submission and I trust that it will be in order for this to be provided to you shortly. OTHER POLICIES THAT WILL AFFECT THE INDUSTRY. 27. As explained earlier, there are other broad policies which will have a damaging effect on the visitor economy and are likely to have the same effect as the former Prime Hotel Site Policy, which was abandoned in the early 2000's because of its negative effects on the industry and its failure to control market forces. As soon as this policy was abandoned, the industry revived and investment	Reject	Amendments to strategic policy SP5 - Economic growth and Diversification are unnecessary as changes have been proposed to policy E1 - Protection of employment land, to specifically exempt both tourist and office accommodation from this policy which should satisfy this objection.	The Minister is not minded to amend the draft Plan



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								funding was released. 28. These policies are Policy SP5 and E1 which presume against the loss of employment land to other uses. No detailed explanation of these policies is given, and no threshold has been indicated for the level of employment activity at which the policy provisions will engage. These policies will have exactly the same harmful effect on the tourism industry as the Prime Site Policy did. Basically, any policy that will cause tourism properties' land values to fall will result in any proposals to invest in the product to be regarded as too risky and will cause reluctance amongst banks (and other lenders) to provide funding to improve the existing tourism product. A further critical factor is that the tourism industry, like many other sectors, survives on the basic principle of a continual flow of owners and operators exiting the industry, for a variety of reasons, who are replaced by incomers with fresh ideas. The effect of these policies would be to disrupt these fundamental market forces, as the ability for operators to exit the industry would be severely compromised.			
DP914		mr daniel wimberley		Policy SP 5	Economic Growth and Diversification	Supporting		The emphasis put on safeguarding employment related floorspace	Noted	Noted	Support is noted by the Minister
DP541		Deputy John Le Fondre			Reducing Dependence on the Car	Neither	Paras 3.31 & 2.64 - Managing appropriate private car travel / parking standards - I would like to state my concern over the approach that seems to come from the Department over parking provision. I am fully supportive of measures to reduce car usage, e.g. commuter trips into Town (say). However much argument seems to revolve around limiting car ownership. I seem to hear consistently from certain officers that the way to achieve this is by reducing (say) parking provision for example in new developments. There has certainly been reference to developments possibly being allowed in St Helier which would have minimal (possibly zero) parking provision. Over time all this does is displace the car to another location. It might be onto the public street, onto the private estate road, into a public car park or somewhere else. However it does not reduce car ownership. It just makes life more complicated for the resident. Unless one has a credible alternative means of transport - e.g. bicycle and a decent route to cycle on, or a regular bus service to the area in which one lives, or to the area to which one wishes to travel, people will continue to be wedded to their car. The trick (to me) is to encourage people to leave their car behind in order		Reject	Current parking guidelines are based on seeking to provide for the maximum level of car parking that might be generated by a particular development: this is not an efficient use of land and neither does it contribute towards the objective of seeking to reduce car use. Whilst acknowledging that it is car use that is most relevant to the issue of managing travel demand by the private car, the ability to park at either end of a journey will influence levels of car use and thus managing the level of parking provision is considered to be a legitimate planning tool in support of this objective. This does not necessarily imply that developments will have no parking provision but rather that parking provision should be based on maximum rather than minimum standards.	The Minister is not minded to amend the draft Plan

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							to make their daily commute. That is all about car usage, not car ownership. I am reasonably aware of the issues associated with parking, and the cost of providing such parking, however just reducing parking provision does not seem to be to be a viable solution. Car ownership will continue to need to be provided for. Car usage is what we should be aiming to reduce. I would also note that within the States I am not alone in this view, and it also appears to be consistent with certain views I have received from individuals within TTS. Indeed this view was supported in the relatively recent debate over VED / petrol duty versus an annual (fixed) motor tax being reintroduced. The latter was firmly thrown out by the States, and one of the reasons was that it was a charge on ownership, rather than a charge on usage, and therefore did not tackle or discourage car usage (for example during the daily commute). There may be occasions whereby some form of payment can be sought from a developer to save them providing parking, and enabling residents to use public parking instead, however these monies just seem to get swallowed up. Therefore if matters such as commuted payments are sought in lieu of parking being provided there needs to be a reasonably rigorous process, possibly involving external professional assistance in calculating the commuted sum, and also to ensure that the money is put aside to improve parking provision elsewhere in the vicinity. I seem to recall that there may be a slight loop hole / provision whereby a developer can argue that public parking in the vicinity of a development can mitigate their own requirement to provide parking, and in my view this should be closed, and the developer is required to pay for the benefit they derive from existing facilities.				
DP908		mr daniel wimberley			Reducing Dependence on the Car	Supporting		Hierarchy of road users, set out in footnote 5 on page 49, which should determine policy options	Noted	Noted	Support is noted by the Minister
DP916		mr daniel wimberley			Reducing Dependence on the Car	Neither	As one example of not taking constraints into account, in 2.61 and 2.63 the phrase "long-term" should be deleted.	These statements completely miss the urgency of the task facing Jersey and the world. I was driving past the harbour last night at a high tide of just 38.1 feet, and a low of 981 I think. The water was only a couple of feet below the level of the various harbour quays.	Noted	The Plan has a 10 year plan period and whilst reducing dependence on the private car may be considered urgent for a number of reasons, it is considered that it is a longer-term objective within a 10 year timeframe.	The Minister is not minded to amend the draft Plan
DP17		Mr Terence Tanner		Policy SP 6	Reducing Dependence on the Car	Neither	People who have a disability would be exempt for use of their vehicles.	There should be an exception for people with disability, who need to use their vehicles without which, would be unable to carry out the basic rudimentary chance, of trying to live as normal a life as possible with said disability. I am in favour	Noted	This policy reflects a general strategic principle: there will always be exceptions where, for example in the case of someone with a disability, the use of a car	The Minister notes the comments made but is not minded to amend the

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								of the essence of the objective, but not everyone will be able to fit into the majority section, provision for people who will fall out of the norm must have separate consideration.(5) this subsection has not been explained enough for consideration> in this there will be need to look at all disabled access I totally agree with disability badge holder policing I have been waiting for a space to come free only to find a fit person using place without badge holder present. Unless it's an emergency there can be no justification to park in the space take my space take my disability and a heavy fine for offending persons.		would otherwise seriously constrain their travel options.	draft Plan
DP27		Mrs Penelope Lee		Policy SP 6	Reducing Dependence on the Car	Objecting	Jersey is the island of the car - you will never get people out of their cars unless you tax them to the hilt, either by a huge rise in the price of petrol or a large tax on car purchase. Years of population growth now make driving an unpleasant experience		Reject	It is appropriate for a land use planning document to seek to provide for choice in people's mode of travel to assist in meeting this objective, which may complement other fiscal measures that work towards the same objective.	The Minister is not minded to amend the draft Plan
DP447		Mr Charles Alluto	The National Trust for Jersey	Policy SP 6	Reducing Dependence on the Car	Supporting	The Trust fully endorses and very much welcomes the objective of reducing dependence on the car.		Noted	Noted	Support is noted by the Minister
DP55		Mr Stephen de Gruchy		Policy SP 6	Reducing Dependence on the Car	Supporting			Noted	Noted	Support is noted by the Minister
DP554		Deputy John Le Fondre		Policy SP 6	Reducing Dependence on the Car	Neither	Please see earlier comments re supporting a reduction in car usage, but being against policies that attempt to reduce car ownership, such as minimal parking standards, as in my view these will not work, and will simply displace cars to another location or cause traffic congestion on the relevant estate. Anecdotal comments received and experience at present does seem to indicate that traffic volumes from the West appear to be increasing (or at least congestion during the daily commute).		Noted	The issue of traffic levels and congestion is set out at 8.7. Whilst levels of walking and cycling appear to be relatively stable, it is evident that levels of public transport use are increasing (see 8.66).	Noted by the Minister
DP603		Mr Paul Le Claire		Policy SP 6	Reducing Dependence on the Car	Supporting		A strong emphasis on removing cars and pollution from town by implementing other strategies	Noted	Noted	Support is noted by the Minister
DP500		Mr Paul Harding	The Association of Jersey Architects		Better by Design	Supporting	The AJA has consistently supported the drive to improve quality of architecture in the Island. It is no coincidence the prime examples of poor place-making and architecture have been produced by non local Architects. The Island has a wealth of local Architects producing building of the highest quality and the AJA hopes this will be recognised and be supported.		Noted	Noted	Support is noted by the Minister
DP501		Mr Paul	The		Better by	Neither	We are disappointed para. 2.71 fails to recognise		Reject	This section of the draft Plan	The Minister is

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		Harding	Associati on of Jersey Architec ts		Design		the contribution contemporary, modern, architecture can make to the diversity and quality of the built environment. There is no reference to supporting modern design that responds to local context. Any Plan with a 'vision' for the 21st Century should encourage architecture appropriate to our time - not just interpretations of traditional forms.			seeks to highlight where the emphasis of good design will be: it does not exclude modern contemporary design. Further reference to modern architecture is provided at Objective GD1 (5) and para 1.42 (GD policies) which states that' good design need not necessarily replicate local traditions'.	not minded to amend the draft Plan and the issue raised is already adequately addressed
DP909		mr daniel wimberl ey			Better by Design	Supporting		The recognition that in design and building, bets value does not always equal cheapest	Noted	Noted	Support is noted by the Minister
DP448		Mr Charles Alluto	The National Trust for Jersey	Policy SP 7	Better by Design	Supporting	The Trust fully endorses and very much welcomes the objective of improving building design.		Noted	Noted	Support is noted by the Minister
DP56		Mr Stephen de Gruchy		Policy SP 7	Better by Design	Supporting			Noted	Noted	Support is noted by the Minister
DP809		Mrs Susan Kerley		Policy SP 7	Better by Design	Supporting	I endorse the suggestions and comments made by the National Trust for Jersey on these policies and proposals		Noted	Noted	Support is noted by the Minister
General Development Control Policies											
DP636		Mr Richard Le Sueur		1	General Developm ent Control Policies	Neither		I am writing to point out a perceived anti-architectural bias that pervades many of the proposed policies. They start from an assumption that architectural interventions, in urban settings, but particularly in landscape settings, inevitably cause 'harm'. You will be aware of many examples of buildings and constructed artefacts in historic landscapes that enhance our appreciation of the wider setting. The 'natural' world, again particularly in Jersey, is overlain with the manmade and shows how millennia of civilization has shaped the landscape. Policies that seek to preserve vistas and mature trees are symptomatic of a deep seated and well meaning public desire to resist change, but are not based on an understanding of the issues that should inform any new Island Plan.	Reject	The Plan seeks to ensure that Island develops a more sustainable pattern of development and land use and, on this basis, the introduction of new buildings and land uses where presently, there may be none, has the potential to undermine this objective. The draft Plan recognises and acknowledges that the Island's many landscape characteristics are an amalgam of natural and manmade elements and seeks to ensure that their essential characteristics are maintained and enhanced which, in many instances, may facilitate development, provided that it is sympathetic to the characteristic of the landscape. Policy in the draft Plan which seeks to maintain views and vistas will, in many instances, be applicable to perspectives of the built form and	The Minister notes the comments made but is not minded to amend the draft Plan

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										not just of the landscape.	
DP186		Mr Stephen de Gruchy		Objective GD 1	General Development Objectives	Supporting			Noted	Noted	Support is noted by the Minister
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 (BREAAM) 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. 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). 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.
DP502		Mr Paul Harding	The Association of Jersey Architects	Policy GD 1	General Development Considerations	Supporting	We are in full support of this section and Policy GD1, GD2 and GD3 except to point out the latter will require an SPG setting minimum density standards without which uncertainty will ensue.		Noted	Noted	Support is noted by the Minister
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		Accept	The proposed amendment is considered to be more appropriate and to provide greater clarity.	The Minister is minded to amend the draft Plan



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					tions		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 ....."				
DP615		Jason Simon	Simon Sand & Gravel	Policy GD 1	General Development Considerations	Supporting		We were invited to comment on the above policy, specifically Policy GD1. in my opinion the policy more than adequately tries to control future development proposals.	Noted	Noted	Support is noted by the Minister
DP690		Mr Andrew Fleet	Style Group Ltd	Policy GD 1	General Development Considerations	Objecting	Section I should be expanded to state the following, 'unless a more efficient use of the land can be achieved through good design'		Noted, but precise reference point is unclear	Noted, but unclear	Noted by the Minister
DP865		David Warcup	States of Jersey Police	Policy GD 1	General Development Considerations	Objecting		A matter has been brought to my attention regarding the (Draft) Jersey Island Plan, currently in the consultation phase of the process. The existing 2002 Plan clearly states the importance of Designing Out Crime at the planning stage in Policy 09. It would appear from the wording within the current draft that less emphasis seems to have been placed on Designing Out Crime. In particular the issue of Crime Impact Assessments is mentioned, although not as a specific policy with any guidance notes. It may well be that that an opportunity could be lost with regards to Community Safety. If I or any member of my team can assist further in this matter then please do not hesitate to contact me.	Reject	Policy GD1(3)(d) makes it clear that the impact of a proposed development on community safety can be material to the determination of a planning application. The justification for Proposal 1 also makes it clear that further information about crime reduction assessment may be required to inform the determination of planning applications and that supplementary planning guidance will be issued to inform this.	The Minister is not minded to amend the draft Plan
DP869		Mr Stephen D Smith	Health Protection Services	Policy GD 1	General Development Considerations	Neither	It is important in any new proposal whether as a government practice or as a stated policy that the ramifications of those aspects are considered in the entirety for their potential impact both positive and negative on the health of the population. This is particularly important for planning matters that have the potential for long term impacts affecting both the environment and through the environment the health of the public.	It is our opinion that all major developments under planning should be subject to a rigorous health impact assessment to determine those impacts, and to ensure that negative impacts are minimised or removed entirely in order to as far as possible protect the health and well being of the population. The plan needs to make this an explicit requirement of applicants for all major developments with agreed independent agents and through open public exercises. The outcomes of those assessments should be mandated upon the development schemes. The improvement and protection of the public health has historically been based on the provision of effective and efficient infrastructure to deal with solid and liquid waste and clean potable water. The islands infrastructure is currently not designed to deal with the current population and therefore the proposal in the States Strategic Plan to permit the expansion of the population creates further issues that must be addressed through any new development proposals. There needs to be a statement that the Island Plan will through	Reject	It is considered that the implications of development for health and public infrastructure are already adequately addressed by this draft policy, at GD1(3)(c) and GD1(1)(d). It is also considered that there is sufficient provision under law for the Minister to require further information about the health implications of major development. Proposal 1 also enables the development of supplementary planning guidance to determine thresholds and the level and form of detail required for any such assessments, should it be considered necessary that guidance is needed to inform applicants about the requirements for such information.	The Minister is not minded to amend the draft Plan as the issues raised are already adequately addressed

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								development support the repair, improvement and expansion of the islands infrastructure.			
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.		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	Accept the need for clear guidance	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

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									n, to develop SPG to address the comments made in order to provide clarity and certainty about appropriate noise standards.		
DP891		Mr Iain Norris		Policy GD 1	General Development Considerations	Neither	Recommendation: that a determination time limit is put, and advice is made available, on decisions that, if delayed can result in economic injury or loss of growth opportunities. This is particularly pertinent to Objective GD1 General Development Objectives (5) in the draft IP	The development of new product lines often needs a quick response from businesses to meet a window of opportunity and to allow them to react to market forces. This means that where planning applications are required these should be dealt with efficiently and as timely as is possible or the opportunity may be lost. Two recent examples illustrate this issue; Jersey Oyster Company Initial discussions with the Planning Department and other parties started in 2003, and though outline planning permission was granted in 2009 design issues still need to be resolved before construction can start. This has restricted the company's ability to develop new markets and delayed efficiency savings. Woodside Farms Ltd Initial discussions with Planning, Agriculture and Housing started in 2003 and permissions were granted in 2008 for the developments at Woodside Farm, La Rue Coutanche, Trinity and permission for the housing development at La Rue du Petit Aleval, St Peter granted in 2009. This has resulted in missed marketing opportunities and delayed the savings to be made from the restructuring of the business. Comment Design is a proper planning consideration and there is a need for applicants to respond positively to the current design agenda as these two cases highlight. However, all parties need to participate in the planning process in order to reduce delays through proactive advice and dialogue to ensure that both the commercial objectives of a project and the planning requirements are fulfilled. As can be seen the policies advocated within the Rural Economic Strategy and the IPR are in tune. However, in the application of IPR policy, there is a need for proactive advice to be available on all aspects of an	Reject	This representation is essentially related to matters of process rather than policy, and is not considered to be material to the draft Plan. The insertion of a policy constraint related to the time taken to determine a planning application is inappropriate and unnecessary. The planning framework, of itself, should contribute towards the ability for the business sector to make investment decisions.	The Minister is not minded to amend the draft Plan

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								application ensuring timely planning decisions can be made within a given time frame. The above will reduce delays in the planning process and give the industry confidence to invest in the future.			
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 already 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
DP145		Acting Chief Officer States of Jersey Police		Proposal 1	Supplementary Planning Guidance	Objecting	See attached letter The existing 2002 Plan clearly states the importance of Designing Out Crime at the planning stage in Policy 09. It would appear from the wording within the current draft that less emphasis seems to have been placed on Designing Out Crime. In particular the issue of Crime Impact Assessments is mentioned, although not as a specific policy with any guidance notes. It may well be that that an opportunity could be lost with regards to Community Safety.		Reject	Policy GD1(3)(d) makes it clear that the impact of a proposed development on community safety can be material to the determination of a planning application. The justification for Proposal 1 also makes it clear that further information about crime reduction assessment may be required to inform the determination of planning applications and that supplementary planning guidance will be issued to inform this.	The Minister is not minded to amend the draft Plan
DP520		Mr Paul Harding	The Association of Jersey Architects	Proposal 1	Supplementary Planning Guidance	Supporting	Proposals 1-14 & Policies BE1-BE3 - St Helier and other Regeneration / Local Development Zones We welcome and support the principal thrust of these sections, the proposals and Policies.		Noted	Noted	Support is noted by the Minister
DP58		Mr Stephen de Gruchy		Proposal 1	Supplementary Planning Guidance	Supporting	If there is not already such a requirement elsewhere, I think that the Island Plan should place an obligation on the Minister to publicly consult on the draft content of such guidance, before he issues it in final form.		Reject	The Island Plan cannot impose an obligation on the Minister to publicly consult on the development of supplementary planning guidance. SPG is produced under Article 6 of the Planning and Building (Jersey) 2002, which places a requirement on the Minister to consult any Minister or statutory authority with an interest in the development the subject of the guidance. It is relevant to consider, however, the particular nature of the guidance proposed to be issued in relation to	The Minister is not minded to amend the draft Plan

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										Proposal 1. The nature of this guidance is largely informative about matters of process and will seek to inform applicants and developers of the information requirements in relation to planning applications. On this basis, the requirement for consultation is not considered to be particularly pertinent given that the matters to which the guidance will address itself will be largely administrative. It is also relevant to note that, under the provisions of the law (Article 9), the Minister may require an applicant to provide further particulars before making a decision in respect of an application, and may refuse an application where these are not provided. The publication of SPG about the nature of 'particulars' which might be required essentially seeks to inform this process and need not thus necessarily be the subject of consultation.	
DP885		Mr Andrew Heaven	Health Improvement (Public Health Department)	Proposal 1	Supplementary Planning Guidance	Neither	In order to ensure health improvement is actively included within the planning process, supplementary planning guidance for health improvement should be developed with the Public Health Department to support the following areas: Establish a mechanism, with the Public Health Department, which ensures that potential health impacts are routinely assessed in order that health outcomes are known and considered as a part of the planning process.		Noted	It is also considered that there is sufficient provision under law for the Minister to require further information about the health implications of major development. Proposal 1 also enables the development of supplementary planning guidance to determine thresholds and the level and form of detail required for any such assessments, should it be considered necessary that guidance is needed to inform applicants about the requirements for such information.	Noted by the Minister
DP964		Mr Tony Gottard		Proposal 1	Supplementary Planning Guidance	Neither	CRIME IMPACT ASSESSMENT The Minister for Planning and Environment will require all planning applications for the development of new or significant alterations to existing, licensed premises to be accompanied by a Crime Impact Assessment. However the Minister reserves the right to request a Crime Impact Assessment on any scheme that might pose a potential risk of crime and disorder. The purpose of a Crime Impact Assessment in the	We've had a request from the police to replace policy G2 (xiv) design out crime with a Crime Impact Assessment policy. OBIB would like to include a policy in the new IP for crime impact assessments on developments for new or significant alterations to existing licensed premises see attached.	Reject	This is a matter of procedure, not policy. The Minister can, by law, require any information to be submitted that he or she considers necessary to determine a planning application. There is no requirement for a policy to achieve this. Policy GD1(3)(d) makes it clear that the impact of	The Minister is not minded to amend the draft Plan



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							design of such schemes is to reduce the potential for crime and disorder, and help to allay public fears about a development that could be brought about by lack of information. A Crime Impact Assessment will be drawn up in consultation with the Crime Reduction Officer, States of Jersey Police and will include: The identification of crime and disorder issues in the vicinity of the development site; An assessment of the development proposal in terms of its likely impact on crime and disorder; Suggested design solutions that will reduce the development proposal's vulnerability to crime. Policy The Minister for Planning and Environment requires all planning applications for the development of new or significant alterations to existing licensed premises, such as Pubs, Clubs, Off Licences, etc., to be accompanied by a Crime Impact Assessment (CIA). The applicant will be expected to consult with the Crime Reduction Officer, States of Jersey Police and the CIA will include: The identification of crime and disorder issues in the vicinity of the development site; An assessment of the development proposal in terms of its likely impact on crime and disorder; Suggested design solutions that will reduce the development proposal's vulnerability to crime.			a proposed development on community safety can be material to the determination of a planning application. The justification for Proposal 1 also makes it clear that further information about crime reduction assessment may be required to inform the determination of planning applications and that supplementary planning guidance will be issued to inform this.	
DP1029		Ray Shead	The Jersey Chamber of Commerce	Policy GD 2	Demolition and Replacement of Buildings	Objecting	The policy in effect lists all existing buildings. The approach is supportable but more flexibility needs to be added into the policy so as not to allow abuse of the policy by the Planning Department or by people objecting to plans. The statement "replaces a building that is not appropriate to repair or refurbish" is too restrictive. A statement with regard to carbon, energy and environmental impact seems to be missing.		Noted but not minded to amend Plan	The policy does not 'list' all buildings but requires a justification for any proposed demolition of them; Section 1.9 of the supporting justification sets out some of the environmental considerations that should apply to any assessment of proposal to demolish a building.	The Minister notes the comments made but is not minded to amend the draft Plan
DP1108		Mr Ben Ludlam	C Le Masurier Ltd	Policy GD 2	Demolition and Replacement of Buildings	Objecting		It is not always possible to refurbish or repair properties and the definition of what is appropriate is highly subjective and leads to uncertainty.	Noted	The policy acknowledges that it is not always possible to repair or refurbish buildings and the policy seeks to require the case for demolition to be clearly set out and justified.	The Minister notes the comments made but is not minded to amend the draft Plan
DP503		Mr Paul Harding	The Association of Jersey Architects	Policy GD 2	Demolition and Replacement of Buildings	Supporting	We are in full support of this section and Policy GD1, GD2 and GD3 except to point out the latter will require an SPG setting minimum density standards without which uncertainty will ensue.		Noted	Noted	Support is noted by the Minister
DP59		Mr Stephen de Gruchy		Policy GD 2	Demolition and Replacement of Buildings	Supporting	Support with Caveats The expression, "appropriate", which appears in paragraph 1, is too vague. Criteria by which to judge when it is not "appropriate" to repair or refurbish should be included in GD2. For example, reference to the		Noted	The appropriateness of repair or refurbishment versus demolition is likely to vary on a case by case basis. It may, however, be possible to determine a series of	The Minister notes the qualified support for this policy

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							likely economic cost of repairs against the anticipated post-repair value of the house may be one consideration.			key tests and consideration will be given to incorporating these into supplementary planning guidance, to inform the interpretation and use of this element of the policy	
DP691		Mr Andrew Fleet	Style Group Ltd	Policy GD 2	Demolition and Replacement of Buildings	Objecting	Section I should be expanded to state the following, 'unless a more efficient use of the land can be achieved through good design'.		Reject	The reasoned justification, at 1.9, seeks to set out the considerations that need to apply to any assessment of the wider sustainability of demolition versus repair and refurbishment: it cannot thus simply be a case of stating that a new, more modern building is more efficient.	The Minister notes the comments made but is not minded to amend the draft Plan
DP1030		Ray Shead	The Jersey Chamber of Commerce	Policy GD 3	Density of Development	Supporting	Minimum densities of development in infill or brown field sites should be encouraged by setting specific minimum densities at each and every opportunity. This would therefore allow for any possible opportunity of redevelopment to be maximized thus ensuring the minimum amount of intrusion into the countryside. Focus on demand on resources, energy and emissions should be encouraged. A better definition of how solutions can be arrived at is required. There should be a separation between urban and rural areas.		Noted	Noted. Supplementary guidance will be developed and published which will seek to establish density standards throughout the Island, with varying standards for urban and rural locations	The Minister notes the qualified support for this policy
DP1186		Valerie Harding		Policy GD 3	Density of Development	Objecting	6.59 " ..land is developed at more efficient and higher densities of development than previously achieved" . The words efficient and higher densities are a contradiction. If the States plan to use the UK density of development then all brownfield sites will eventually have 200+ units of housing which is far to dense anywhere in the island. This is " sink estate" size and could lead to social and neighbourhood problems in a few years. Nothing efficient in this type of build. The current maps of brownfield sites in the Island Plan show one field designated and numbered for initial development but other field s coloured in along side which implies larger development hence the figure of 200+ per site. The development at Goose Green Marsh (to which many Parishioners objected) has 102 units and is like a rabbit warren and a blot on the landscape and this is a private development not a States one. Have the following been taken into account: when reaching a 4000 figure:- local youngsters who attend university in the UK rarely return to live in the island so these should not be included in the estimate. Several people are currently living in the island that are working under a contract and in due course will leave Jersey. More people are living at home with their parents than at any time in the past 30 years. Many local younger		Reject	The provision of new development at higher densities is necessary in order to ensure the optimum use of land and also to safeguard the need to develop greenfield sites to provide new homes. The provision of new development at higher densities will not be at the expense of good design or a good quality living environment and other policies in the draft Plan seek to safeguard these elements.	The Minister notes the comments made but is not minded to amend the draft Plan

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							couples live in France and commute to work in Jersey. Itinerant immigrants will not stay in the island and could not afford to buy anyway. Many Madierans have homes in their own island and will not be buying property in Jersey. There are a large number of empty properties unsold in the island perhaps the States should ensure these are sold/rented first before developing further into the countryside. Restraint on non-residents being able to buy properties in Jersey as an investment . The mind-set that everyone should own their own home is purely a British concept . Thousands of Europeans live in rented flats . Major problems with waste disposal if large scale developments go ahead in the countryside . The only saving grace is that the re will be a five year check on development - hopefully.				
DP504		Mr Paul Harding	The Association of Jersey Architects	Policy GD 3	Density of Development	Supporting	We are in full support of this section and Policy GD1, GD2 and GD3 except to point out the latter will require an SPG setting minimum density standards without which uncertainty will ensue.		Noted	Noted	Support is noted by the Minister
DP597		Mr John Pinel		Policy GD 3	Density of Development	Supporting		The achievement of higher densities might involve introducing a greater level of flexibility on matters such as the provision of amenity space and on-site car parking standards Introduction of minimum density standards would be one way of achieving this !!!	Noted	Noted	Noted by the Minister
DP60		Mr Stephen de Gruchy		Policy GD 3	Density of Development	Supporting			Noted	Noted	Support is noted by the Minister
DP867		Mr Robin Troy		Policy GD 3	Density of Development	Objecting	The policy for a greater urbanisation of the town of St. Helier and other built-up areas with a general concept of non-development in other non urban areas, must be resisted; 2. The concept of development of urban areas with greater density and higher buildings in a mistake and, although this may not lead in the short term to development similar to Monaco, would, in my view, in the long term run the risk of doing so. The limits on development and the nature in which it will be permitted under the 2009 Draft Island Plan will cast a die for development under future Island Plans with the only option for the States of Jersey under future Island Plans being to adopt a policy of ever-higher buildings and ever greater density;	As a parent of children in their teens and early twenties , I am extremely concerned that a new concept for the development of residential housing is being introduced with a restriction to development presumption of development in the built-up zone. I also object to the associated concept of greater density with the resulting need for higher buildings on urban sites and the general concept against all residential building in the green zone. In my view such concepts and policies will only result in the value of urban sites being driven up and thereby increase the cost of redeveloped residential units on those sites whilst increased density will result in "little boxes" one on top of one another. I note from my children that they and their friends are appalled at the size and nature of flats and apartments that have been constructed in recent years. It is my view that unless the Island is prepared to ensure that young people have a decent and proper place to live, this Island will lose its natural-born children to other	Reject	The States Strategic Plan takes the Island Plan with meeting the Island's housing needs without the development of any more greenfield sites. To achieve this requires the more efficient and effective use of sites which are already developed which inevitably leads to an increase in density. Comments related to space standards for new accommodation are noted. The Minister will, however, be revising and publishing new standards for residential development to ensure the provision of homes which meet people's needs and aspirations.	The Minister notes the comments made but is not minded to amend the draft Plan

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								places, with their talents lost to the Island and the investment in them (in connection with their education or otherwise) wasted. It is my concern that if policies are put in place by this Draft Island Plan that centralize development to the urban areas with the inception of a concept at the other end of the spectrum of a presumption against prohibition of development in non-urban areas, that at the end of the ten year period for the 2009 Draft Island Plan, the next step will be to further restrict and prohibit development in all non-urban areas and that development of ever-higher blocks will be the only option available to future planners who will have to put forward policies for future Island plans in years to come.			
DP556		Deputy John Le Fondre			Planning Obligations	Neither	Public Realm / Planning Gain etc - whilst possibly not the right place to refer to this, there are some quite significant developments where planning gain has been rightly required, sometimes in the form of public realm. Whilst there is always a financial viability to any scheme, to me the Department should start to take a far more robust attitude to planning gain, such that it should be delivered either prior to the commencement of any project (if practicable), or during the early phasing of the project. There is certainly a concern I have encountered amongst professionals that where planning gain is left to the end of a project, it either takes a long time to be completed, or is never completed, and therefore any perceived benefits to the wider public are lost. To me professional advice should be sought as to how to improve processes to ensure that the department has the correct practical authority and leverage to ensure that the public benefits are received on a timely basis.		Noted	Planning gain can often be delivered through the use of planning obligation agreements where the timescales for the delivery of outputs can be specified and agreed by all parties that are signatories to the legally binding agreement.	Noted by the Minister
DP1031		Ray Shead	The Jersey Chamber of Commerce	Policy GD 4	Planning Obligations	Objecting	It is essential that early confirmation of potential obligations to a scheme is provided at the planning stage so as to allow a Developer to assess the financial implications that might arise. It is suggested that during the pre-application advice stage of an application or a proposal, any planning obligations are highlighted by the Planning Department at this early stage. Some members believe that the use of planning obligations may do the reverse of that intended and stop the development of affordable homes, etc. There needs to be a workable system to deal with this matter and further guidelines agreed so that it does not become overly prescriptive. The position must not be reached whereby if the applicant does not agree to the obligations being imposed a permit will not be issued. Who will decide what planning obligations will be imposed upon a development?		Noted	The requirement for planning obligations agreements will be dependent upon the nature and scale of any development proposal and it may not be possible to determine these in advance of planning applications being submitted and assessed. Where possible, however, the use of development briefs and pre-application discussions will be used to inform of the likely requirement for planning obligation agreements. A planning obligation agreement is a mutually binding agreement and thus must be determined and agreed by all those parties	The Minister notes the comments made but is not minded to amend the draft Plan

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							The imposition of planning obligations will slow the planning process and will lead to dispute over what is reasonable. Time is also an issue as is cost in negotiating and drawing up legally binding agreements. There should be an opportunity to invest in development improvements and enhancements i.e. energy and emission reduction strategies and investment in renewable technologies.			that are signatories to it.	
DP449		Mr Charles Alluto	The National Trust for Jersey	Policy GD 4	Planning Obligations	Supporting	Planning Obligations 1.21 and GD4 The Trust would like to suggest that the scope of planning obligation agreements to benefit the public realm should be widened to also include the natural and historic environment. For example the development above Goose Green Marsh could have established an endowment to create and maintain the wet meadowland below the newly developed residential area. In addition the recent residential developments by St James could have helped facilitate repairs to the roof of St James Church.		Noted	Noted, but planning obligations must be reasonable and related to the development to which they are associated. It is relevant to note that the POA for La Providence does make provision for the maintenance of the wetland. The POA for La Providence included an agreement that the developer would produce a detailed scheme for ensuring the future maintenance and management in perpetuity of the public amenity area / wetland to the south of the housing development (Fourth Schedule, Clause 2.2). A 'Landscape Management Plan' was subsequently approved for all the public areas, including the public amenity area / wetland. This supplements approved landscaping proposals and planting plans and an earlier 'Landscape Ecological Review' for the site. Following discussions with the 'Head of Countryside' at Environment, approval has also been given to an 'Addendum', which provides additional details relating to the land management of the Public Amenity Area, including more specific management requirements for the wetland meadows. Future management and maintenance will be secured by an 'Estate Management Company' which was set up by the developer and is / will be paid for by the residents of La Providence and any other future landowners. The potential scope of POAs will be expanded upon through revised	The Minister notes the comments made but is not minded to amend the draft Plan



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										supplementary planning guidance.	
DP61		Mr Stephen de Gruchy		Policy GD 4	Planning Obligations	Supporting	Support with Caveat I find the use of the word, "appropriate" in the second paragraph too vague. The use of that word is unfair on an applicant. How will he/she have any certainty as to when the Minister is likely to think it "appropriate" to set a planning obligation? Criteria by which the Minister will determine, "appropriate", should be included in GD3.		Reject	The requirement for planning obligations will vary depending on the nature and scale of a development proposal and each case will require assessment on the basis of its individual merits. On this basis, the use of the word 'appropriate' is considered to be appropriate. Where possible, for example, in the case of sites rezoned for housing or through the preparation of development briefs and master plans for key development sites, it will be possible to identify and specify planning obligations in guidance.	The Minister notes the qualified support for this policy but is not minded to amend the draft Plan
DP810		Mrs Susan Kerley		Policy GD 4	Planning Obligations	Supporting	I endorse the suggestions and comments made by the National Trust for Jersey on these policies and proposals		Noted	Noted	The Minister notes the qualified support for this policy
DP841		Mr Rod McLaughlin		Policy GD 4	Planning Obligations	Neither	In the UK there has been a relatively recent recognition that the social needs of a community include provision of cultural facilities, and that the delivery of such facilities can properly be supported by a contribution from developers whose schemes have the effect of increasing those social needs. (See, for instance, <a href="http://www.living-places.org.uk">www.living-places.org.uk</a> ) At 1.21 and in policy GD4, it is suggested that cultural facilities are included in the list of social provision which might be supported by planning obligation. From a practical perspective the levying of a contribution of this kind would have to be considered along with any other obligations contemplated by the Planning Department, including those relating to the percentage for art policy. However, it would give the flexibility, particularly in relation to development in St Helier, to recognise that provision of cultural facilities is integral to a sense of local community. This connects directly with the aspiration of paragraph 4.19 of the Built Environment section of the plan which states that 'it is hoped 1St Helier]...will become one of Europe's most desirable and vibrant harbour towns with ...improved architecture, shopping, public spaces, leisure and arts facilities ...'		Noted	The comments made are noted. The extent that POAs can be used to ensure contributions to the provision of cultural facilities is a matter to be considered in relation to the specific circumstances of individual development proposals and could be further addressed through supplementary planning guidance	The Minister notes the comments made but is not minded to amend the draft Plan
DP910		mr daniel wimberley			Skyline, Views and Vistas	Supporting		Re-affirmation of the importance of the skyline and the preservation of views and vistas and of the beauty of our coastline in general Emphasis on design quality and effective procedures for ensuring that this happens	Noted	Noted	Support is noted by the Minister

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DP270		Mrs Penelope Lee		Policy GD 5	Skyline, Views and Vistas	Supporting			Noted	Noted	Support is noted by the Minister
DP450		Mr Charles Alluto	The National Trust for Jersey	Policy GD 5	Skyline, Views and Vistas	Supporting	The Trust fully endorses and very much welcomes the objective of protecting the skyline, views and vistas of Jersey		Noted	Noted	Support is noted by the Minister
DP62		Mr Stephen de Gruchy		Policy GD 5	Skyline, Views and Vistas	Supporting			Noted	Noted	Support is noted by the Minister
DP731		Paul Harding	The Association of Jersey Architects	Policy GD 5	Skyline, Views and Vistas	Objecting	5.2 The AJA believes the thinking behind para 1.27, that stipulates " the scale or height of existing buildings and structures which detract from an important skyline, vista or view will not be accepted as a precedent for their redevelopment.. " is seriously flawed. Para. 1.23?1.27 presupposes that buildings detract from vistas and the skyline, whereas in fact they can enhance views. For example, the escarpment skyline around St Helier contains important buildings - such as Fort Regent & Victoria College - that enhance their location and surrounding vistas. If this Policy had been in force when these buildings were conceived they would not have been built! The way this section has been approached is overtly anti-built environment and needs reconsidering or even better absorbing into GD1 or BE3 where it would be more appropriately placed.		Reject	The policy enables the Minister and the Planning Applications Panel to take into account the impact of new development on an important public skyline, vista and view and, where that involves the redevelopment of existing buildings, to review the contribution that development makes to this particular aspect. It is not considered that the proposed policy regime is anti-development but rather it serves to highlight the significance of this particular issue as a material consideration.	The Minister is not minded to accept the comments made and is, accordingly, not minded to amend the draft Plan
DP812		Mrs Susan Kerley		Policy GD 5	Skyline, Views and Vistas	Supporting	I endorse the suggestions and comments made by the National Trust for Jersey on these policies and proposals		Noted	Noted	Support is noted by the Minister
DP271		Mrs Penelope Lee		Policy GD 6	Contaminated Land	Supporting			Noted	Noted	Support is noted by the Minister
DP63		Mr Stephen de Gruchy		Policy GD 6	Contaminated Land	Supporting			Noted	Noted	Support is noted by the Minister
DP876		Mr Stephen D Smith	Health Protection Services	Policy GD 6	Contaminated Land	Neither	The use of Brownfield sites for development is supported as long as matters such as contaminated land are dealt with properly and site clean up is appropriate for the end use. The contaminated land planning process is failing at the moment due to the lack of a contaminated land register, which readily identifies sites, which either are contaminated or have been subject to contaminative uses. No domestic premises should be built in the future at La Collette due to land geology and land use.		Noted	Noted	The Minister notes the qualified support for this policy
DP521		Mr Paul Harding	The Association of Jersey	Proposal 2	Achieving Design Quality	Supporting	Proposals 1-14 & Policies BE1-BE3 - St Helier and other Regeneration / Local Development Zones We welcome and support the principal thrust of these sections, the proposals and Policies.		Noted	Noted	Support is noted by the Minister

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			Architects								
DP64		Mr Stephen de Gruchy		Proposal 2	Achieving Design Quality	Supporting			Support Noted		Support is noted by the Minister
DP842		Mr Rod Mccloughlin		Proposal 2	Achieving Design Quality	Neither	In paragraph 1.37 attention is drawn to the potential of area masterplans and development briefs to encourage high design quality. Such plans also afford the opportunity to embed cultural objectives; for instance, the potential for public art or for the provision of cultural facilities . It would be helpful to highlight that potential.		Reject	There are many other objectives that master plans will seek to achieve - this section is related to design quality and it is considered legitimate to focus any reference solely to that issue in this section. The Minister would undoubtedly be keen to work with and engage ESC in the development of terms of reference and the master plans themselves to ensure that the outcome from them can contribute towards cultural objectives	The Minister is not minded to amend the draft Plan
DP1018		Ray Shead	The Jersey Chamber of Commerce	Policy GD 7	Design Quality	Objecting	Developers are "encouraged" to seek the advice of UK architects when there are very many talented architects within the Island, although this fact would be denied by the Planning Department. This causes further delays, fee revenue lost to Jersey and the resultant tax revenue losses.		Reject	Developers are encouraged to engage people who are suitably qualified to ensure that the Minister's design objectives, referred to in Objective GD1(5), as set out by Policies SP7; GD1; GD7 and Proposal 2, are secured through the planning process	The Minister is not minded to accept the comments made
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
DP272		Mrs Penelope Lee		Policy GD 7	Design Quality	Supporting			Noted	Noted	Support is noted by the Minister
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 'pantechicon' 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	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

Ref	Agent	Name	Org/bus.	No.	Title	Response	Suggested changes to the document:	Why you consider this to be necessary:	General Response	Detailed Officer Response	Minister's Recommendation
								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".			supplementary planning guidance
DP614		Mr Bruce Willing		Policy GD 7	Design Quality	Objecting	Great emphasis is made of roofscapes, but there is no emphasis on the colour of the buildings. Therefore, unusual colours, like the Normans building within Commercial Buildings, would still be allowed as there is nothing proposed to stop it. Yet previously unpainted buildings are restricted from being painted (require Planning permission), particularly if they are designated as SSI's. With the increased use of coloured render, careful consideration should be made, within the DIP, of the need to have at least a code of best practice when it comes to the external colour of buildings.		Noted	The requirements for the need for planning permission to carry out works are set out in the General Development Order. Accordingly, any building or other structure may be painted without planning permission with the exception of listed buildings which have not been previously painted. In this respect, therefore, the Minister's control over the use of colour on most existing buildings is limited. The Minister can and does, however, encourage the appropriate use of colour and guidance is provided, specifically in relation to St Helier, in the Urban Character Appraisal, which provides recommended colour palettes for different parts of the town. The colour of new development can be initially controlled under the policy regime of the draft Plan as set out in GD1 and GD7 (see GD7(3)).	The Minister is not minded to amend the draft Plan as the issues raised are already adequately addressed
DP65		Mr Stephen de Gruchy		Policy GD 7	Design Quality	Supporting			Support Noted		Support is noted by the Minister
DP1019		Ray Shead	The Jersey Chamber of Commerce	Policy GD 8	Percentage for Art	Objecting	The cost of percentage for art is a further stealth tax, the production of models is a further cost and when all this is added up it does not really give the right signals that development is being encouraged, in fact it almost appears that it is actively discouraged which is a great vote winner. The Draft Island Plan is suggesting several taxes on development not only for Percentage for Art but also within Policy HE. This together with planning obligations and any other infrastructure increases is essentially a stealth tax on developments. Members of Chamber have suggested that maybe an "all-in-one" tax should be promoted on development so as to allow the Developer to understand the full consequences of the development rather than		Reject	The Percentage for Art policy cannot be a tax as the contribution towards Percent for Art is voluntary. It is the function of the planning system to ensure the quality of the environment and, in this respect, it is considered legitimate that the planning system seeks to encourage contributions to enhance the public realm where new development is proposed, through artistic expression.	The Minister is not minded to amend the draft Plan

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							negotiated multiple policies which may cause an increase in building costs during the planning process. Some members believe that Percentage for Art should be dropped on the grounds that public art is not a matter for planning and it will not help to deliver Category A or affordable housing as uneconomic developments will just not happen. The policy is too wide - the planning policy needs to be objective and not subjective.				
DP273		Mrs Penelope Lee		Policy GD 8	Percentage for Art	Supporting			Noted	Noted	Support is noted by the Minister
DP659		Mr Mark Le Boutillier	GR Langlois	Policy GD 8	Percentage for Art	Neither	We would suggest that this Policy could be extended to 'Percentage for Art and/or Environment'. Many schemes, especially in rural locations would probably benefit more with a contribution to the natural environment either on or close to the proposed development site, In a recent JEP article see attached) it was stated that 'Jersey trees for life' were struggling for funds. As a 'Percentage for Environment' a contribution could possibly be made directly to 'Jersey Trees for life' or other environmental groups where ultimately the whole Island would benefit.		Noted	The Percentage for Art scheme is voluntary and its objective is to secure improvements to the public realm through the expression of art in buildings and spaces: this, of itself, can include soft landscaping, where there is some artistic input (supplementary guidance provides more information). Policy NE1 encourages and promotes landscaping and the creation of new habitat as part of new development . Policy NE4 states that where landscaping is not or cannot be provided as part of a development scheme then contributions to the Ecology Trust Fund or the Countryside Renewal Scheme may be encouraged, through the use of planning obligation agreements.	The Minister notes the comments made but is not minded to amend the draft Plan as the issues raised are already adequately addressed
DP66		Mr Stephen de Gruchy		Policy GD 8	Percentage for Art	Supporting			Noted	Noted	Support is noted by the Minister
DP843		Mr Rod Mcloughlin		Policy GD 8	Percentage for Art	Supporting	The greater emphasis placed in the new draft Island Plan on public art is welcomed with the explicit statement that circumstances in which agreements for agreements for public contributions include those where 'provision of public art would enhance...enjoyment of the building, development or space.' Recent examples in Jersey suggest that the public responds well to art which is relevant to its surroundings and which contributes to a broader sense of place - notable examples are La Vaque de Jerri in Wests Centre and the Liberation Sculpture. Such art often serves to reinforce cultural significance, perhaps telling a story that helps perpetuate understanding of the history of a place or focusing on an individual associated with that		Noted	Noted. The issues raised about the local cultural relevance of art procured through the Percentage for Art policy, and the involvement of local artists, is considered more appropriately dealt with thought supplementary planning guidance.	The Minister notes the qualified support for this policy



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							area. To reinforce the public value of the percentage for art scheme, it would be useful to include reference to the importance of cultural relevance of work produced through the scheme. Although this is particularly true of work generated through public projects when a degree of public involvement in project development will be important , it also applies to private development where considerable public kudos may result from a work which is seen genuinely to contribute to the quality of the public realm. A by-product of the percentage for art policy from the cultural perspective is the economic and artistic benefit of involving local creative talent, either directly in the creation of work or indirectly through learning opportunities associated with the engagement of visiting artists. This relates directly to objective 3.6 of the Cultural Strategy: '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. ' The emphasis placed on local artists and crafts-workers reflects the inter-relatedness of many aspects of cultural development: involving local artists is a way of encouraging the development of a pool of creative talent in the Island which has an economic as well as an artistic dimension. While it is acknowledged that it will also be desirable to involve non-local artists in projects for a variety of reasons, it should be noted that there is an opportunity to include in the terms of any commissions the requirement for those artists to provide learning opportunities for the local community. The wider cultural context for percentage for art is provided by the Cultural Strategy and also by the Public Art strategy commissioned in 2009.				
DP884		Mr Andrew Heaven	Health Improvement (Public Health Department)	Policy GD 8	Percentage for Art	Neither	In order to ensure health improvement is actively included within the planning process, supplementary planning guidance for health improvement should be developed with the Public Health Department to support the following areas: Revise the current planning guidance for 'percentage for art' to allow developers to invest in amenities which promote exercise and wellbeing.		Reject	The essence of the Percentage for Art scheme is to secure enhancement of the public realm through artistic expression as part of the development process associated with new buildings and spaces. This, of itself, may have the potential to contribute towards quality of life and personal well-being by contributing towards the overall quality of the environment. The role of the planning system in supporting the provision of amenities which promote exercise is considered to be	The Minister notes the comments made but is not minded to amend the draft Plan

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										better, and more appropriately related, to the consideration of the location of development relative to the availability of travel options which might encourage walking and cycling (which is dealt with by the Spatial Strategy of the draft Plan at SP1 and SP6) and through the provision and enhancement of public open space (which is addressed in Policy SCO5 and which should be a consideration in Policy GD1 and GD7)	
DP274		Mrs Penelope Lee		Policy GD 9	Signs and Advertisements	Supporting			Noted	Noted	Support is noted by the Minister
DP68		Mr Stephen de Gruchy		Policy GD 9	Signs and Advertisements	Supporting			Noted	Noted	Support is noted by the Minister
DP829		Mr Rod McLaughlin		Policy GD 9	Signs and Advertisements	Neither	In relation to signage for cultural events, the Planning Department operates a liberal informal regime at present which allows for the display of signs promoting cultural events of various kinds. However, to add formal weight to this and to assist in distinguishing such events from purely commercial ones, it would be useful for the policy to include reference to allowing the display of signs for cultural events which are supported directly by the States of Jersey, or are voluntary community activities. Road signs and other official signage are permitted as 'approved advertisements' under schedule 1 of the Planning and Building (Display of Advertisements) (Jersey) Order 2006. This is effectively a delegation of the power to erect signs to other departments. However, there is little guidance as to the aesthetic impact that such signage can have; in particular, the extent to which the density and style of signs can compromise the sense of distinctiveness which lies at the heart of the Island's cultural identity. There is a balance to be sought between provision of signage which is effective and provides a safe public environment, and that which maintains an appropriate sense of Island scale and proportion. There is also scope for informational signage to respect context and, perhaps, itself to contribute a sense of local distinctiveness. A potential link exists here with some publicly generated percentage for art projects.		Noted	Cultural versus commercial signage: the display of signage and advertising is regulated by the Planning and Building (Display of Advertisements) (Jersey) Order 2006 and the proposed policy framework of the draft Plan seeks to establish those criteria against which proposals for signage and advertisement which require consent can be tested. Whilst appreciative of the objective behind the proposal, the distinction between what is cultural and what is commercial advertising is often a fine one and not considered to be a significant material consideration for a planning policy framework: the key question in planning terms is whether or not a proposal to advertise requires consent and if so, whether it is acceptable according to the criteria set out in GD9. Statutory signage: the design and specification of some statutory signage is regulated by international convention (e.g. the UN Convention on Road Signs and Signals, Vienna, 1968) where there is less flexibility for discretion in terms of the form,	Noted by the Minister

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										number and positioning of signage. It is, however, acknowledged that there are forms of signage erected under the auspices of a statutory function where there is greater discretion and flexibility. It is proposed that the development of the Public Realm Strategy, as set out at Proposal 9, would include engagement with and advice for the providers of statutory services which affect the public realm, including signage in order that the adverse aesthetic implications of some of this signage upon the public realm can be ameliorated and the Island's local distinctiveness safeguarded. The principles and tests also set out at Policy BE9: Street furniture and materials, are considered to be equally applicable to signage and advertising. The potential integration of artistic values into the development of signage which reflects Jersey's local distinctiveness is also acknowledged.	
DP991		Captain Howard Le Cornu	States of Jersey Harbours	Policy GD 9	Signs and Advertisements	Neither	Presumably this excludes operational signage at the port and airport? Specific reference should be made in the policy:		Reject	As stated in the preamble to the policy, the requirement for permission to display signage is controlled by order, which sets out various exemptions for the requirement for consent. Where signage is proposed at both the harbours and the airport, which do not benefit from express consent under the auspices of the order, they will fall to be considered and assessed under the terms of this proposed policy.	The Minister is minded to reject the comments made as the issue raised is already adequately addressed
Natural Environment											
DP34		Mrs ani Binet		2	Natural Environment	Neither	Jersey's Natural Environment is clearly identified as the islands "Countryside and Coast" in section 2. The countryside and coast are clearly very important in terms of Jersey's biodiversity, but this distinction means that there is no place in the report for urban biodiversity. Also, within the Draft Island plan species protection is identified as a need	Rural and urban biodiversity are both considered of equal importance in UK planning policy. "Planning Policy Statement 9: Biodiversity and Geological Conservation" acknowledges the role of biodiversity as integral to all development. On an Island which is only 9 miles by 5 miles most land could be considered to be at least semi-urban,	Noted	Urban biodiversity: The draft Plan addressed urban biodiversity as part of Policy NE1, which applies to the whole Island, and not just the coast and countryside. Habitat creation: Policy NE1 also seeks to encourage and promote	The Minister is not minded to amend the draft Plan as the issues raised are already addressed

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							within development, however little mention is made with regards to enhancement of habitats.	therefore this "enhancement for biodiversity" principal could provide a valuable tool for future planning. Just think how much better the Islands biodiversity could be if enhancement as well as protection was required under the Island Plan? This principle could offer considerable potential within both the rural and urban areas, especially with any new initiatives e.g. the New Town Park Proposal.		habitat creation in the context of new development proposals	
DP766		Dr S Richards		2	Natural Environm ent	Supporting	I strongly support protecting our natural environment by avoiding in particular installation of mobile phone masts any building work resulting in change to our beautiful views eg high rooflines apposite lobster pot & off Le Petithurel at L'Etacq agricultural chemicals - fertilisers and pesticides which wash into water supply and harm nature dumping waste/rubbish along seawall at La Saline slipway at L'Etacq	Current practices are damaging the wonderful natural environment we have inherited and it is our duty to ensure it exists in optimal condition for our children and into the future Once it is gone it will be gone forever. We have responsibility as custodians to look after it.	Noted	Installation of mobile phone masts: Policy regime provided by Policy NR14. Whilst there is no presumption against development in the coast and countryside, to ensure optimal telecommunication coverage, it is clear that proposed new development needs to be cognisant of its visual impact. Views and vistas: the introduction of a new policy, GD5, seeks to ensure that the implications of new development for skylines, views and vistas can become an explicit material consideration; Agricultural chemicals: the application of chemicals to the land is not a land use planning matter, but Policy NR1 seeks to protect water resources from the impact of development; Dumping waste/rubbish along seawall at La Saline slipway at L'Etacq: not a planning policy matter but, depending on the extent of the issue, may be controlled through the enforcement of planning control.	The Minister notes the comments made but is not minded to amend the draft plan as the issues raised are already addressed
DP767		Mrs F Frary		2	Natural Environm ent	Supporting	I strongly support protecting our natural environment by avoiding in particular installation of mobile phone masts any building work resulting in change to our beautiful views eg high rooflines apposite lobster pot & off Le Petithurel at L'Etacq agricultural chemicals - fertilisers and pesticides which wash into water supply and harm nature dumping waste/rubbish along seawall at La Saline slipway at L'Etacq	Current practices are damaging the wonderful natural environment we have inherited and it is our duty to ensure it exists in optimal condition for our children and into the future Once it is gone it will be gone forever. We have responsibility as custodians to look after it.	Noted	Installation of mobile phone masts: Policy regime provided by Policy NR14. Whilst there is no presumption against development in the coast and countryside, to ensure optimal telecommunication coverage, it is clear that proposed new development needs to be cognisant of its visual impact. Views and vistas: the introduction of a new policy, GD5, seeks to ensure that the implications of new development for skylines, views and vistas can become an	The Minister notes the comments made but is not minded to amend the draft plan as the issues raised are already addressed

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										explicit material consideration; Agricultural chemicals: the application of chemicals to the land is not a land use planning matter, but Policy NR1 seeks to protect water resources from the impact of development; Dumping waste/rubbish along seawall at La Saline slipway at L'Etacq: not a planning policy matter but, depending on the extent of the issue, may be controlled through the enforcement of planning control.	
DP149		Mr Andrew Thompson			NE: Introduction	Supporting	2.15 'public attitudes to further development of the countryside have hardened', and these attitudes will be reflected in the new Plan with a strong presumption against development of greenfield sites.	At present it is too easy to regard fields and open spaces as 'in-fill' sites, no matter whether they are in the countryside or in the Built-up area. Development of such fields encourages dreadful ribbon development which should always be discouraged - regardless of whatever area the 'site' is in.	Noted	The Spatial Strategy of the draft Plan, set out at SP1 seeks to ensure that the Island's development needs are met through the existing Built-up Area, so as to ensure that the countryside is protected from new development as far as possible.	The Minister notes the support for the strategic approach to the natural environment
DP275		Mrs Penelope Lee			NE: Introduction	Supporting	There needs to be stronger protection of the countryside.	Large tractors and lorries are destroying hedgerows both alongside roads and in fields. I have bit concerns about the use of toxic chemicals with their benign effects on both humans and wildlife. The countryside is currently regarded as a rubbish dump by sections of the population and it currently littered with drinks cans, plastic bottles and containers, etc. We are told there is no money for this to be removed Collection of rubbish/litter from the edges of roads, hedgerows and fields should be a priority.	Noted	The issues raised are largely related to the management of the countryside and not the regulation of development within it. The draft Plan, at Proposal, sets out the Minister's intent to prepare an Island Landscape Management Strategy which should address many of the issues raised, involving engagement with key stakeholders	The Minister notes the comments made but is not minded to amend the draft Plan as the issues raised are already addressed
DP375		MR Keith Shaw			NE: Introduction	Objecting	It is interesting to see that no mention of Ramsar has been made nor the lasting damage to shellfish from the neuricces and viviers by the harbour in St Helier to the Bay of Grouville		Reject	The pressure on the marine environment is set out at 2.18 and Ramsar sites are identified at 2.24 and Map 2.1, and are given due protection under Policy NE1	The Minister is not minded to amend the draft Plan as the issues raised are already addressed
DP397		Mr Nicolas Jouault			NE: Introduction	Neither	The value of the marine environment should be looked at from different aspects not just the interests of the commercial fishery but leisure tourism in the form of bird watching, walking, education, research, and angling. A 50% area of the Island waters be put aside as no take zones so as to allow the natural environment to re-establish itself and replenish and sustain the long term interests of a declining commercial fishing. In the national park consultation several submissions advocated conservation of the sea and shoreline around St Ouen this was not carried through in the following	Long term benefit for the Island. Often in nature you can not replace what you lose.	Noted	The inherent value of the marine environment is recognised and protected through the policy regime provided by Policy NE1; NE2 and NE5. The issue of 'no-take' zones is management issue to be addressed through the ICZM	The Minister is not minded to amend the draft Plan as the issues raised are already addressed



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							publication, or this plan - WHY NOT! The coastal strategy advocates marine protected areas such as no take zones by 2010 - where are they? surely they merit being part of the Island Plan. Please drop the tidal power work if this is not working for or being implemented by large nations why is the Island tinkering with the idea, surely there are more needy requests for such research and funding. Wildlife wardens are needed to monitor and survey the natural habitats of the Island.				
DP399		Mrs. Celia Scott Warren			NE: Introduction	Neither	Plemont should be considered a multi-generational asset and land swaps should be thoroughly investigated in order to return Plemont to its natural beauty for all Islanders to enjoy.	We will never again have the opportunity to save Plemont from development.	Noted	The comment made relates to a mechanism, involving significant public intervention, which might be used to remove the development potential from a vacant holiday camp site in the Green Zone. This is matter out with the planning policy framework of the draft Island Plan.	The Minister notes the comments made but does not consider them to be material to the draft Island Plan
DP436		John Le Maistre	Jersey Farmers Union		NE: Introduction	Objecting	2.17 - TOURISMANDRECREATION The structural change in agriculture has the potential to create uncertainty as to the future of agricultural land and there is always the potential that significant tourism and recreation uses, such as the creation of new outdoor leisure activities or sporting facilities, such as a golf course, will emerge as a development proposal during the Plan period. We feel the above view takes a very pessimistic view of agriculture. We feel that food security and the provision of local produce will become even more important in the future. We contend that at present there is a good demand for agricultural land which is reflected in the rents paid and that any loss of land to the Industry will have a negative impact on the Agricultural Industry. (ref para 2.17) see attached letter		Reject	The draft Plan simply identifies the potential for change in the agricultural industry which may, as has been demonstrated recently, be very rapid. It is acknowledged that the demand for agricultural land is presently high. Any proposals for the development of agricultural land will, however, always be considered against Policy ERE1: Safeguarding of agricultural land	The Minister is not minded to amend the draft Plan
DP439		John Le Maistre	Jersey Farmers Union		NE: Introduction	Neither	EQUINE GRAZING We feel that greater controls should be imposed on equine grazing as more and more land is being taken up for this purpose. ORCHARDS AND DOMESTIC CURTILAGES: We also note that a number of orchards are being planted on green areas surrounding private residences, in some cases to prevent the land being utilised by the Agricultural Industry and having agricultural activities in close proximity to the dwelling. From an examination of the Planning Applications, it is also evident that more and more applications are being made by householders to convert areas of land to domestic cartilages. (ref para 2.14) See attached letter		Noted	Policy NE6 and NE7 make it clear that there is a strong presumption against the loss of the countryside for the extension of domestic cartilages. Clearly, Policy ERE1 seeks to protect good agricultural land, but the use of land for equine purposes is classified as agricultural so this use is difficult to regulate from a land use planning perspective, even though it is clearly recognised as a pressure, as set out at 2.14	The Minister notes the comments made but is not minded to amend the draft Plan
DP557		Deputy John Le			NE: Introduction	Neither	Ref para 2.16 Tourism - tourism does need support. Please see comment DP558.		Noted	Noted	Noted by the Minister

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DP18		Mr Terence Tanner			NE: Objectives and Indicators	Objecting	The incinerator development should be stopped under the provision that it will cause damage to Ramsar site at La Collette	As set out in Objective NE 1. Indicators NE 1 relates to Number and extent of key habitats ( 9 ) formally designated as protected sites ( 10 ) ;	Reject	EfW application already determined	The Minister is not minded to amend the draft Plan
DP28		Mr Terence Tanner			NE: Objectives and Indicators	Objecting	Addition information as to reasons why and my knowledge of this subject as I worked for RRB/Public services at Bellozanne for 15years in the Vehicle and Maintenance section as a fully qualified Plant Fitter Mechanic I have first hand experience of the working and procedures of the plant admittable I do not have knowledge of the new plant under construction but can surmise the possible problems that relate to plants of this nature Breakdowns and maintenance cause exposure to possible substantial toxic material which is liable to pollute the surrounding area no matter how clean you set up the working practice on paper does not relate to the work undertaken. The older the plant becomes the more toxic it will become. Once the plant has reached its final use and it must be demolished it will undoubtedly release the inherent built-up of toxic matter to the surrounding area As you already have had plans drawn up for a new plant being built in Bellozanne over the currant workshops it would have been more sensible to have kept the toxic matter in one place which is already toxic and working. I have more objections to this plant at La Colette but know they will fall on deaf ears so I will finish on this final point in twenty/thirty years from now what will our children think of us leaving them with an highly toxic site on our beautiful coast line I will be glad I probably will not be around to say. We told you so and the establishment will say in hind sight we can not change what was done we can only try and do the best job to clean up the mess our fathers left us?	I ask the question will it make a difference?	Reject	This question relates to a specific development which is currently under construction (EfW plant at La Collette) and which has been the subject of an EIA. The discharge of material from the site, during construction and during operation, is not a land use planning matter and will be regulated under separate legislation relating to waste management.	The Minister is not minded to amend the draft Plan as the matter raised is not material to proposed planning policy
DP404		Mrs Christine Gill			NE: Objectives and Indicators	Supporting		Loss of biodiversity is becoming one of the key features of anthropomorphic changes to the environment. There is a tendency to try to protect the visible, and possibly already threatened, species at the expense of considering the livelihoods of all species. Unnecessary 'landscaping' by thoughtless householders, some of whom have large houses in highly sensitive areas, seems to be increasing. (Portelet headland is one example, now a mass of lawns and granite walls where once rocky outcrops and natural vegetation existed.) There should be no further buildings on the coastline, and where houses already exist, a strong presumption against tidying up and formalising the land. This may have to be achieved through education rather than	Noted	The regulation of development on the coast and in the countryside will be largely achieved through Policies NE6 and NE7, relating to the Coastal National Park and the Green Zone, where there is general presumption against new development, including new buildings and the change of use of countryside to domestic curtilage. The impact of development upon biodiversity would fall to be considered under Policy NE1 and NE2.	Support is noted by the Minister

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								regulation.			
DP1023		Ray Shead	The Jersey Chamber of Commerce	Objective NE 1	Natural Environment Objectives	Supporting	The protection of the countryside and nature conservation is flagged as key requirements and is supported with regard to the Island's tourism industry. This is supported as it influences the character and nature of the environment we live in.		Noted	Noted	Support is noted by the Minister
DP276		Mrs Penelope Lee		Objective NE 1	Natural Environment Objectives	Supporting			Noted	Noted	Support is noted by the Minister
DP402		Mrs Christine Gill		Objective NE 1	Natural Environment Objectives	Supporting			Noted	Noted	Support is noted by the Minister
DP69		Mr Stephen de Gruchy		Objective NE 1	Natural Environment Objectives	Supporting			Noted	Noted	Support is noted by the Minister
DP1010		Mr John Mesch	Council for the Protection of Jersey's Heritage	Indicators NE 1	Natural Environment Indicators	Neither	11. The finite and diminishing area of land available for human occupation is the key planning factor which demands closer analysis. It is recommended that all future planning applications should record a precise measurement of the area of previously undeveloped land which will be lost to development if the application is approved. The total annual rate of loss of previously undeveloped land can then be measured and recorded.		Noted	The extent of land use change is one of the indicators proposed for the draft Plan: this can be measured using Geographic Information System data and trends identified.	The Minister notes the comments made but is not minded to amend the draft Plan as the issue raised is already adequately addressed
DP277		Mrs Penelope Lee			Biodiversity	Supporting			Noted	Noted	Support is noted by the Minister
DP452		Mr Charles Alluto	The National Trust for Jersey		Biodiversity	Neither	The Trust is also unaware of the current legal status of ESAs as we have not been consulted or advised in this respect.		Noted	The Minister is able to issue guidance and policies in relation to particular areas of the island under Article 6 of the Planning and Building (Jersey) Law 2002, and ESAs can be designated under this legal provision.	Noted by the Minister
DP453		Mr Charles Alluto	The National Trust for Jersey		Biodiversity	Neither	Wetlands The Trust is of the view that specific mention should be made of the Island's remaining terrestrial wetlands as they are of enormous ecological importance and under increasing threat from incremental residential development. It is widely acknowledged that St Ouen's Pond is worthy of Ramsar designation and it is fortunate to be afforded additional protection through the proposed Coastal National Park. However, Grouville Marsh and Rue des Pres have both suffered from inappropriate development on their boundaries in recent times and unless specific steps are taken to protect these remaining fragments and most crucially their surroundings (buffer zones) we are in		Noted	All of these sites are designated as ESAs, as set out at 2.25 where they are all specifically identified, and are also Listed as Sites of Special Interest. Accordingly, they would fall to be protected under Policy NE1.	The Minister notes the comments made but is not minded to amend the draft Plan as the issue raised is already addressed

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							real danger of destroying the rich biodiversity that they currently support. (Please see attached report)				
DP506		Mr Paul Harding	The Association of Jersey Architects		Biodiversity	Objecting	Biological Diversity, Species Protection and Wildlife Corridors - NE1-NE3The AJA submits this section ignores the inter-relationship between the natural and built environment and the potential for enhancing the natural environment within the built-up area has been overlooked. We must not see the 'natural' and 'built' environment as two separate and mutually irreconcilable worlds - they are not discrete and separate. There is potential for incorporating the natural environment into the built-up area.		Reject	The potential for integrating the natural and the built environment is accepted and is explicitly recognised in the draft Plan, as set out in Policies NE1-3 which have equal application and validity in an urban, rural and/or coastal context.	The Minister is not minded to amend the draft Plan
DP631		Richard Plaster	Jersey Electricity plc	Map 2.1	Ramsar Sites	Neither	We rely on our subsea electricity cables to France which over a period of time will require maintenance, replacement and the possibly of new installations. Any national parks or extension to RAMSAR sites etc. must not lead to a position where wide areas of the sea bed become unavailable such that we are unable to maintain and renew these essential links.		Noted	Proposals for the maintenance and renewal of underwater cables are not precluded by the policy regime applicable to sites designated because of their natural or historical significance but the policy regime will seek to ensure that the benefit of any such work is weighed against the environmental implications of it and that any adverse implications are mitigated as far as possible.	The Minister notes the comments made but is not minded to amend the draft Plan
DP1144		Mrs Susan Kerley		Policy NE 1	Conservation and enhancement of biological diversity	Objecting	See DP451: respondent supports rep of NTfJ		Reject	The policy regime applicable to the protection of biodiversity and sites of ecological value is enhanced in the draft Plan (principally Policies NE1 and NE2) compared with those in the current 2002 Island Plan (Policies G11 and C3). There have and always will be competing interests presented by the assessment and determination of development proposals and it is the task of the planning system to reconcile any such conflicts. It is considered preferable that this is done within an established policy framework, which is what Policy NE1 seeks to provide where there are implications for sites of ecological interest. The Minister for Planning and Environment is charged by law to determine any such decisions. Where proposals have significant environmental implications he may establish a Public Inquiry before he determines any such application. Whilst the use of the States as a	The Minister is not minded to amend the draft Plan

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										decision-making body in relation to planning applications is not considered to be an efficient or effective means of government, it remains within the gift of the Minister to refer any such matter to the States should he or she be inclined to do so.	
DP144		Jersey Bat Group Jersey Bat Group	Jersey Bat Group	Policy NE 1	Conservation and enhancement of biological diversity	Objecting	Having read and reviewed the Draft Island plan we, as the Jersey Bat Group, recognise that it contains many good ideas. However, where biodiversity is considered within the report, it seems to be restricted to established Greenfield sites and Jersey's Natural Environment is clearly identified as the islands "Countryside and Coast" in section 2. The countryside and coast are clearly very important in terms of Jersey's biodiversity, but this distinction means that there is no place in the report for urban biodiversity. The built environment section makes no reference to urban biodiversity save for a brief mention in the Green Backdrop Zone "New planting and landscaping should be appropriate to the landscape character of the area and should also seek to contribute towards the Island's biodiversity through habitat creation and the use of appropriate species. Further guidance on the character of these areas is given in the Countryside and Urban Character Appraisals" Many of Jersey's species use man made structures as essential components in their habitat requirements. All bats in Jersey are known to roost in buildings, the majority of our recorded bat roosts are in houses and 27% of our known bat roosts are within the "Built up Area Boundary" proposed within the Draft Island Plan, this highlights the fact that urban biodiversity is already established and urban areas are just as important as rural ones. As well as bats many birds use features of man made construction for their roosts; notably house martins, swifts and swallows, toads also often use gardens for their breeding sites and Wall Lizards live in man made stone walls such as those associated with the many forts on the island. Rural and urban biodiversity are both considered of equal importance in UK planning policy. For example: "Planning Policy Statement 9: Biodiversity and Geological Conservation" <a href="http://www.communities.gov.uk/documents/planningandbuilding/pdf/147408.pdf">http://www.communities.gov.uk/documents/planningandbuilding/pdf/147408.pdf</a> "The Government's objectives for planning are: to promote sustainable development by ensuring that biological and geological diversity are conserved and enhanced as an integral part of social, environmental and economic development, so that policies and		Reject	Policy NE1 has Island-wide application and is not limited to the coast or countryside. It also clearly includes provision for habitat creation.	The Minister is not minded to amend the draft Plan as the issues raised are already addressed



Ref	Agent	Name	Org/bus.	No.	Title	Response	Suggested changes to the document:	Why you consider this to be necessary:	General Response	Detailed Officer Response	Minister's Recommendation
							<p>decisions about the development and use of land integrate biodiversity and geological diversity with other considerations. to conserve, enhance and restore the diversity of England's wildlife and geology by sustaining, and where possible improving, the quality and extent of natural habitat and geological and geomorphological sites; the natural physical processes on which they depend; and the populations of naturally occurring species which they support. to contribute to rural renewal and urban renaissance by: - enhancing biodiversity in green spaces and among developments so that they are used by wildlife and valued by people, recognising that healthy functional ecosystems can contribute to a better quality of life and to people's sense of well-being; and - ensuring that developments take account of the role and value of biodiversity in supporting economic diversification and contributing to a high quality environment"</p> <p>This policy acknowledges the role of biodiversity as integral to all development. As an Island which is only 9 miles by 5 miles most land could be considered to be at least semi-urban, therefore this "enhancement for biodiversity" principal could provide a valuable tool for future planning. With the Draft Island plan species protection is identified as a need within development, however little mention is made with regards to enhancement of habitats. As the Jersey Bat Group we liaise quite closely with the Environment Department with regards to reported bat roosts, in particular where we have reason to believe there may be bats roosting within a site on which work is due to be carried out. The Environment Department currently do a very good job of checking sites where planning applications have been submitted and when protected species are found they are able to impose conditions in line with the Conservation of Wildlife law. However depending on the type of work being carried out planning permission may not always be required so they are not always able to protect the roosts. I believe that they are also currently unable to impose enhancement measures, but think how much better the Islands biodiversity could be if enhancement as well as protection was required under the Island Plan? This principle could offer considerable potential within both the rural and urban areas, especially with any new initiatives e.g. the New Town Park Proposal.</p>				
DP278		Mrs Penelope Lee		Policy NE 1	Conservation and enhancement of	Supporting	Landowners should be encouraged to plant trees and other measures to increase bio-diversity	Currently much of the countryside consists of banks denuded of vegetation by over trimming by mechanical hedge machines. These provide no food or cover for wildlife.	Noted	Noted	Support is noted by the Minister

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					biological diversity						
DP451		Mr Charles Alluto	The National Trust for Jersey	Policy NE 1	Conservation and enhancement of biological diversity	Objecting	The Trust is deeply concerned to see that the levels of protection afforded to our Ramsar sites and ecological SSIs under the Island Plan 2002 (Policy G13) appear to have been watered down in the new plan.	Ramsar and SSI sites must be afforded the highest level of protection and not be put at risk from subjective judgements, as to what equates to exceptional circumstances where the need for development clearly outweighs the biodiversity value of site. If unfortunately such decisions need to be made in the interests of the Island, then it is crucial that such responsibility should lie with the States Chamber as opposed to the Minister.	Reject	The policy regime applicable to the protection of biodiversity and sites of ecological value is enhanced in the draft Plan (principally Policies NE1 and NE2) compared with those in the current 2002 Island Plan (Policies G11 and C3). There have and always will be competing interests presented by the assessment and determination of development proposals and it is the task of the planning system to reconcile any such conflicts. It is considered preferable that this is done within an established policy framework, which is what Policy NE1 seeks to provide where there are implications for sites of ecological interest. The Minister for Planning and Environment is charged by law to determine any such decisions. Where proposals have significant environmental implications he may establish a Public Inquiry before he determines any such application. Whilst the use of the States as a decision-making body in relation to planning applications is not considered to be an efficient or effective means of government, it remains within the gift of the Minister to refer any such matter to the States should he or she be inclined to do so.	The Minister is not minded to amend the draft Plan
DP596		Mr John Pinel		Policy NE 1	Conservation and enhancement of biological diversity	Objecting	As we discussed there is a structure contained in one of the English Planning Policy Statements (PPS9) <a href="http://www.communities.gov.uk/documents/planningandbuilding/pdf/147408.pdf">http://www.communities.gov.uk/documents/planningandbuilding/pdf/147408.pdf</a> that contains provision for enhancement in both the rural and urban environments as follows: "to contribute to rural renewal and urban renaissance by: - enhancing biodiversity in green spaces and among developments so that they are used by wildlife and valued by people, recognising that healthy functional ecosystems can contribute to a better quality of life and to people's sense of well-being; and - ensuring that developments take account of the role and value of biodiversity in supporting	Ecology does considerable work trying to maintain sites for bats, swallows and other species with particular requirements. This work would benefit greatly with the principles of enhancement enshrined firmly within the Island Plan. As an example we would currently check any large old building with a planning application that was proposing to make material changes to lofts, outbuildings - we would be looking for bats, swallows nests etc. When we find bats we make representations for the continued use of the site through planning conditions with powers from the wildlife law. How much better however if we could safeguard the bat roost and promote the carport as a potential swallows nest through the principles	Reject	The draft Plan makes clear, at Policy NE1, that biodiversity is not just a material consideration where development proposals affect designated sites, but relates to all sites, whether urban and rural. Policy NE1 also contains provision to enhance biodiversity through the creation of habitat.	The Minister notes the comment made but is not minded to amend the draft Plan as the issues raised are already adequately addressed

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							economic diversification and contributing to a high quality environment" I would like to see this enhancement principle in our new Island plan. It looks like the current document is leaving biodiversity at the gates of the SSI's or within designated areas and I think we are missing a trick.	of enhancement. We could also maybe advocate a hedgerow that would connect other habitats together and the planting of trees. If we used the effort we currently make with the possibility of enhancement this work could amount to a much greater impact and biodiversity gain. Holding this principle in both rural and urban environments offers considerable potential especially with any new initiatives eg the new town park proposal.			
DP70		Mr Stephen de Gruchy		Policy NE 1	Conservation and enhancement of biological diversity	Supporting			Noted	Noted	Support is noted by the Minister
DP279		Mrs Penelope Lee		Policy NE 2	Species Protection	Supporting			Noted	Noted	Support is noted by the Minister
DP71		Mr Stephen de Gruchy		Policy NE 2	Species Protection	Supporting			Noted	Noted	Support is noted by the Minister
DP280		Mrs Penelope Lee		Policy NE 3	Wildlife Corridors	Supporting	More needs to be done to encourage tree planting on hedgerows within fields that are generally over trimmed by mechanical means too frequently.		Noted	Noted	Support is noted by the Minister
DP72		Mr Stephen de Gruchy		Policy NE 3	Wildlife Corridors	Supporting			Noted	Noted	Support is noted by the Minister
DP357		Mr Mike Waddington			Trees, Woodland and Boundary Features	Neither	I think the Island Plan should include a mechanism for protecting all mature trees in the Island, or at least those in St Helier and other built-up areas where they provide essential (and realistically) irreplaceable amenity benefit. I would like to see an end to the current loophole, where a scheme could be refused on the basis that (one) concern is that it would mean that an existing mature tree is damaged or loss- but the refusal notice offers no protection (unlike an approval where the tree can be specifically protected by condition). My suggestion is blanket protection to all mature trees in the built-up areas (say, by girth, height or species?). Put the onus on the applicant to then argue for tree felling through the Planning Application process, but with the starting point that there is a strong presumption against damaging existing healthy trees.		Rejected	Policy NE4 is considered to provide a sufficiently robust policy mechanism to protect trees and woodland in relation to the determination of planning applications. Trees considered to be of particular public amenity value can be added to the List of Protected Trees under the auspices of the existing Planning and Building (Jersey) Law out with any planning application process or, where in the event of a refusal of planning permission, there is identified a need to confer specific protection on a high public amenity value tree.	The Minister is not minded to amend the draft Plan as the issues raised are already addressed by the draft Plan and/or existing legislation
DP1033		Ray Shead	The Jersey Chamber of Commerce	Policy NE 4	Trees, Woodland and Boundary Features	Objecting	The Minister may require landscaping schemes to be carried out in connection with unrelated land or require financial contributions to the Ecology Trust Fund or Countryside Renewal Scheme. Through planning obligations. This is felt by some members to be another development tax which will again be		Reject	This is not a tax but recognition of the responsibilities of developers to ensure that new development makes an appropriate contribution to the quality of the environment.	The Minister is not minded to amend the draft Plan

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							subjective. This is not acceptable.				
DP281		Mrs Penelope Lee		Policy NE 4	Trees, Woodland and Boundary Features	Supporting			Noted	Noted	Support is noted by the Minister
DP73		Mr Stephen de Gruchy		Policy NE 4	Trees, Woodland and Boundary Features	Supporting			Noted	Noted	Support is noted by the Minister
DP282		Mrs Penelope Lee		Proposal 4	Coast and Countrysi de Character	Supporting			Noted	Noted	Support is noted by the Minister
DP454		Mr Charles Alluto	The National Trust for Jersey	Proposal 4	Coast and Countrysi de Character	Supporting	The Trust fully endorses and very much welcomes the objective of their being adequate regard to the Countryside Character Appraisal when determining planning proposals.		Noted	Noted	Support is noted by the Minister
DP523		Mr Paul Harding	The Associati on of Jersey Architec ts	Proposal 4	Coast and Countrysi de Character	Supporting	Proposals 1-14 & Policies BE1-BE3 - St Helier and other Regeneration / Local Development Zones We welcome and support the principal thrust of these sections, the proposals and Policies.		Noted	Noted	Support is noted by the Minister
DP75		Mr Stephen de Gruchy		Proposal 4	Coast and Countrysi de Character	Supporting			Noted	Noted	Support is noted by the Minister
DP930		Mr James Godfrey	Royal Jersey Agricult ural & Horticult ural Society	Proposal 4	Coast and Countrysi de Character	Neither	Inappropriate 'additions' to the Jersey countryside: The Jersey countryside has evolved a distinctive ' open' character that reinforces the intimate nature previously mentioned. This is being undermined by activities that seem, in themselves, benign. Two good examples of this are the increasing trend of planting thick hedges which block traditional vistas, and the raising of banks by up to 1.5 metres without planning consent. Both these lead to a change in the open character and worse encourage non permitted activity to carry on unobserved and become 'accepted' , for instance the removal of land from agricultural production into mown parkland.		Noted	The creation of new banks requires planning consent although the repair of existing ones is a matter of fact and degree. The landscaping of such banks, where they require consent, would be considered within the context of the Countryside Character Appraisal, to ensure that the local character of the landscape was not undermined by inappropriate landscaping. The draft Plan, at Policy ERE1, NE6 and NE7, sets out a clear presumption against the change of use of land from agriculture to parkland or an extension of domestic curtilage.	Noted by the Minister
DP1169		Mr Greg Morel	States Of Jersey		Marine Zone	Objecting	NE 6 What does access to water include? Steps from house, new slipways? The phrase "does not seriously harm" would seem to be a bit loose. Can a tighter definition be found?		Reject	Access to water: essentially this seeks to include those forms of development that seek to facilitate any form of access to the sea which will principally relate to new slipways; Serious	The Minister is not minded to amend the draft Plan

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										harm: this is phrase commonly used in planning tests	
DP674		Mrs Sue Lissenden			Marine Zone	Supporting	Delighted that the conservation of marine resource is considered to be fundamental. This must be remembered when such economic factors as wind-turbines are being discussed.		Noted	Noted	Support is noted by the Minister
DP283		Mrs Penelope Lee		Map 2.3	Marine Zone	Supporting			Noted	Noted	Support is noted by the Minister
DP259		Mr. Chris Parlett	Gorey Boat Owners Association	Policy NE 5	Marine Zone	Objecting	This policy states that if approved, this policy would '..... Presume against all developments, except those which are essential for Navigation, etc' . The preamble (2.52) specifically states that '.... Marinas, land reclamation, etc will not be permitted'. We argue that this proposal goes too far, and should either be dropped altogether, or at least modified to read ' .....Except in the immediate vicinity of existing harbours'.	Over the last 20 years, there have been a number of proposals to extend the harbour or mooring facilities at Gorey Pier. In the last 3 years, the Gorey Boat Owners Association has commissioned graphical layouts for a marina proposal at the rear of the existing pier, and has a costed fee proposal from a major engineering company to undertake the required studies. Whilst the current climate appears to rule out the immediate start of such a development, we believe that this will return to being a serious consideration in the near future. There are several reasons why this is a serious consideration: 1. The ancient pier is suffering serious internal damage under constant pounding from the sea - a new arm to the rear will provide protection; 2. The waiting list for moorings in Gorey alone is bigger than the total number of boats currently in the harbour, so demand for expansion potential is certainly there, generating revenue for the States in mooring fees; 3. The reclaimed land at the rear of the pier will provide car parking for the area, allowing the regeneration of the pier area with al fresco eating free of cars; 4. The resultant deep-water harbour will bring in ferries and fishing vessels as well as visitors to the area. Whilst there will undoubtedly be obstacles to overcome to make this proposal a reality, the new Island Plan should not eliminate the opportunity before it reaches the Planning Department.	Reject	In the absence of a fully justified business case which seeks to set out the full community benefit and environmental implications of a new marina proposal at Gorey, including its implications for historic setting and character of the castle and harbour, the presumption against further marina development is considered to be appropriate and robust on the basis of the sustainable use and management of the marine environment; Any serious proposal to develop any such facilities at Gorey, or any other of the Island's harbours would need to be dealt with as departure from the Island Plan or through the master planning process, in relation to the areas of the Old Harbours, La Collette and the Port of St Helier, as identified at Proposal 11.	The Minister is not minded to amend the draft Plan
DP74		Mr Stephen de Gruchy		Policy NE 5	Marine Zone	Supporting			Noted	Noted	Support is noted by the Minister
DP770		PG Donne Davis	St Helier Boat Owners Association	Policy NE 5	Marine Zone	Objecting	We write to make the case for more attention to be given to Marine Leisure in the Plan. Marine Leisure makes a number of contributions to Island life and the economy, for example:- It is an important leisure activity for thousands of islanders, young and old, the rich and the less well off. It benefits tourism by attracting numbers of generally affluent visitors, whose spending power makes a significant contribution to the retail economy - shops and restaurants - and to Jersey Harbours revenue. It		Reject	The presumption against further marina development is considered to be appropriate and robust on the basis of the sustainable use and management of the marine environment; Any serious proposal to develop any such facilities at Gorey, or any other of the Island's harbours would need to be dealt with as	The Minister is not minded to amend the draft Plan as it is considered that the issues raised are already adequately addressed.



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							<p>supports a range of businesses including marine engineers, fuel suppliers, chandlers, boat sales and insurance brokers. It provides enhancement to the land value of areas surrounding marinas and old harbours. With proper planning, we believe that there is the potential for significant growth in marine leisure and associated industries. We are therefore disappointed at the rather cursory, fragmented and apparently contradictory treatment included in the Plan. Specifically, we refer to:- Marine Zone, page 92, 2.52 - "To ensure its sustainable management and use, development in the e M marine Z o ne i ncluding , j or exa mp l e ma rinas ... w ill n ot b e p ermi tted. " Since any marina development inevitably has to be within the Marine Zone as defined , we strongly oppose this constraint and submit that the criteria in the third paragraph of Policy NE 5 are too prescript ive and subjective and will potentially prevent any expansion of marine leisure in the Island. Page 339, 8.159 - "marine leisure activities, including the provision of marina facilities, a reconsidered I saw here in the Plan ". In fact there is no other mention, never mind consideration, of the provision of marina facilities in the Plan. We are given to understand that this omission is because a Masterplan for the 'East of Albert' area is awaited, but surely a masterplan should fit within the constraints of the Island Plan, not the other way round. This leads us to Regeneration Zones, Pages 154-156 and Proposal I I - Here St Helier's leisure moorings are split between two regeneration zones and the Waterfront zone, with the potential for different outcomes impacting on the boating fraternity. We understand the purpose of these zones, the redevelopment potential and the issues set out in the Plan, however little account has been taken of the land based infrastructure necessary to support the marine leisure activities, which provide the enhanced land values to the regeneration zones. This include s parking for users and marine traders, facilities blocks, access to slipways, boat lift out hoists, a secure and environmentally controlled boat park, chandlers, engineering sheds, marina offices, etc. Much of this infrastructure must be in close proximity to the waterside and, importantly, cannot be expected to provide the level of returns that might be expected from the development of luxury flats or restaurants. It is therefore imperative that sufficient areas of land around the harbours and marinas are zoned appropriately, so as to retain for Jersey Harbours the scope and flexibility to serve both existing drying harbours and marinas</p>			<p>departure from the Island Plan or through the master planning process, in relation to the areas of the Old Harbours, La Collette and the Port of St Helier, as identified at Proposal 11. It is acknowledged that master planning affecting the commercial port and marine leisure facilities at St Helier needs to be co-ordinated and to take account of the interdependence of the areas identified. Any such master planning also needs to ensure that there is full engagement with key stakeholders.</p>	

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							and any future expansion thereof. In making this point, we wish to avoid the serious planning mistakes that continue to mar Elizabeth Marina, where all the surrounding land was handed over to WEB and subsequent planning consents have taken little or no account of land based marina infrastructure requirements. In summary, we submit that the Island Plan should include a coordinated approach to all aspects of the marine leisure industry and provide scope for its development during the plan period.				
DP972		Mr. Maurice DUBRAS		Policy NE 5	Marine Zone	Objecting	The Marine Environment - (p 79) Unless I have missed it, I regret that there appears to be no proposal for 'no-take' zones to be introduced to enhance the animal population within our waters of at-risk species as well as those for which Jersey is famous. My time in New Zealand once again emphasized the great success they have had in pioneering that approach. My time in British Columbia reinforced the need there for greater reserves. We should take note of others' situations and actions and 'do our bit'.		Reject	The introduction of no-take zones is not a matter that can be regulated through planning powers but rather is a management issue more appropriately dealt with through fisheries regulation and/or the ICZM strategy	The Minister is not minded to amend the draft Plan as the issue raised is not a planning matter
DP992		Captain Howard Le Cornu	States of Jersey Harbours	Policy NE 5	Marine Zone	Objecting	Include the words 'excluding any harbour' in the Policy wording after 'territorial limits'. 2.52 - remove the word 'marinas'	Reference to Mean High Water includes all the Island's harbours which may require development in order to meet SoJ policy on the development of the marine leisure industry.	Reject	Any development of the marine leisure industry needs to be considered within the policy context provided by Policy NE5.	The Minister is not minded to amend the draft Plan
DP284		Mrs Penelope Lee			Coastal National Park	Supporting			Noted	Noted	Support is noted by the Minister
DP509		Mr Paul Harding	The Association of Jersey Architects		Coastal National Park	Supporting	We enthusiastically welcome and support this section.		Noted	Noted	Support is noted by the Minister
DP558		Deputy John Le Fondre			Coastal National Park	Neither	Coastal National Park - As you are probably aware I own the El Tico which has recently been redeveloped. Therefore I have had some experience of rejuvenating a very tired building in a sensitive location. I believe the end result has been very widely complimented (including by the National Trust), and therefore it does give credence to the view of the Minister that good design can compliment the local environment. The reason I mention this is that I strongly believe that the tourism industry should in certain guises be encouraged. Whilst my own personal experience was not plain sailing, I would note that it started from the premise that the site was very dear to my heart, and had been in the family for over 50 years. The development in itself was marginal in terms of financial viability, and would not have been possible without significant support from various members		Noted	The proposed policy regime of the draft Plan enables the redevelopment of 'tired' tourism uses in both the Green Zone and the Coastal National Park i.e.. NE6(4) and (5) and NE7(5). The draft Plan also enables conversion of existing buildings to appropriate uses, which might include tourism, in the Green Zone, under Policy NE7(6) and in the CNP under NE6(4) and (5).	The Minister is not minded to amend the draft Plan as the issues raised are already adequately addressed

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							<p>of my family. I mention this for a number of reasons : 1) I believe that self catering (provided the residential loop holes are closed), should be supported and encouraged across the Island, for small scale combinations. However tourism facilities need to be financially viable. 2) My interpretation of the policies in the proposed Island Plan is that any new self catering will only be encouraged (permitted ?) in the built up area. Tourism offerings in the Green Zone appear mixed - Policy EVE1 refers to existing tourism facilities, which seems to be in conflict with para 10 of Policy NE7. 3) The Coastal National Park covers a very significant part of the Island. It includes Greve de Lecq (including significant lengths of the valleys), Bonne Nuit and Bouley Bay to name but a few locations. All key scenic, attractive locations, and areas where tourists like to visit. These are also areas where individuals might wish to stay. With the continuing demise in certain hotels (e.g. Waters Edge in Bouley Bay), the diverse offering of Jersey, the ability of a visitor to wake up in the morning and look out across one of the fantastic sea views that we have will become increasingly limited, particularly if one is on any form of budget. I would note that I supported the principle of a National Park and went to one of the consultation sessions. In my view one of the key threats to the special nature of (say) St Ouen's Bay is the spread of residential development. For example at La Pulente. 4) Therefore, in my view, we need to balance the threat of encroaching development, with the recognition that for existing sites, there should be an ability to improve (in a limited manner) the tourism offering. This may mean that existing old buildings may no longer be fit for purpose, particularly if they have to meet current environmental health standards, and therefore may need to increase in scale. The policies under NE6 and elsewhere seem to preclude this. Note this is purely for existing developments (ie I would not want to encourage a new build on a green field site), and only for tourism use, not for residential. This does then support small family businesses, potential diversification within the agricultural economy, and improves our offering to the outside world, without which we will potentially fall into decline. 5) A classic dilemma will be the Watersplash. Without commenting on the particular scheme, I strongly support the principle of that site being significantly rejuvenated. It is an eyesore at present. The 2002 Island Plan specifically identified Le Braye, El Tico and Watersplash as sites</p>				

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							requiring special consideration. Since then only El Tico has changed. If one looks around the Island at many of the spectacular bays we have, most of which (rightly) fall into the remit of the Coastal National Park, and we have many substandard buildings which must be getting close to the end of their lives. IE there is only so long that one can patch up and make do on these types of buildings, particularly due to their often exposed locations. Therefore I think that for existing commercial (ie which make a contribution to our tourism offering), there needs to be some measure of flexibility, provided that scale is appropriate, quality of design etc. That needs to include the provision of self catering units in order to continue to diversity our offerings to the visitors that do wish to come to our Island.				
DP1001		Mr John Mesch	Council for the Protection of Jersey's Heritage	Policy NE 6	Coastal National Park	Supporting	6. Remarkably, other than the new Coastal National Park the draft plan lacks a sufficiently clear policy statement which is needed to protect our historic and beautiful coastal and rural landscapes that are an essential part of our cultural heritage. It is relevant here that the Council of Europe has recommended that the governments of member states should shape policies for cultural landscape area conservation and managed evolution within the context of general landscape policy. This is described in detail in the Appendix to Recommendation No. R (95) 9. 8. We support the designation of a Coastal National Park very strongly, but repeat our opinion that the Park should be extended to include the coastal area from L'Etacq to the Plemont headland including historic field patterns lying to the East of the headland, all clearly shown on the 1795 Richmond map. This beautiful, historic, coastal landscape is an entity and part of our cultural heritage that the States have a clear legal and moral responsibility to restore and preserve for the enjoyment of present and future generations. Policy statement NE 6 is too long and filled with unnecessary caveats which obscure the intention to protect this conservation area from further development. It is suggested that the statement of policy for the Park should be succinct and robust along the lines: New development inside the boundaries of the Coastal National Park is forbidden unless the States of Jersey agree that new development is necessary to meet a specified essential need of the community and that the proposed new development cannot be located elsewhere.		Reject	The designation of the Coastal National Park and the Green Zone is based on the Countryside Character Appraisal, which included an assessment of the historic evaluation of the landscape and the historic influences upon it; It is considered that Policies SP1 and SP4 provide clear and strong statements about the intent of the draft Plan to protect the character of the Island's countryside and coast; No previous representation has been made to include additional land between L'Etacq and Plemont in the designation of the Coastal National Park. As stated above, the designation of the CNP is based on the CCA which does not identify this area of land as being of the most sensitive landscape character; The suggested policy regime is too restrictive and fails to recognise the existence of land uses and buildings within the defined CNP, where it would be wholly unreasonable to resist some forms of development, as set out in the proposed policy, and where some development may actually deliver improvements in the impact of those buildings and uses upon the area.	The Minister is not minded to amend the draft Plan

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DP1034		Ray Shead	The Jersey Chamber of Commerce	Policy NE 6	Coastal National Park	Neither	There may be tensions in existence here as competing objectives and needs of the Island arise e.g. growing population and an increasing demand for land.		Noted	It is a clearly stated objective of the draft Plan to protect the most valuable and vulnerable landscapes of the Island, represented in particular by the coast, as set out at SP1 and SP4.	The Minister is not minded to amend the draft Plan
DP1109		Mr Ben Ludlam	C Le Masurier Ltd	Policy NE 6	Coastal National Park	Objecting		The policy is a presumption against new development but also re use of existing buildings, which may render them as unusable and left vacant, which is not economically acceptable or best use of existing structures. The Planning Department will be aware C Le Masurier have a consent for the development at the Milano bars site, L Etacq which is not time restrained and at some stage the site will be developed. The Island Plan should specifically note this site, Planning consent 4524 J - 17th June 1996.	Reject	The policy does not preclude the re-use or redevelopment of existing buildings. There is no requirement to make specific reference to any extant permissions in the draft Plan	The Minister is not minded to amend the draft Plan
DP285		Mrs Penelope Lee		Policy NE 6	Coastal National Park	Supporting			Noted	Noted	Support is noted by the Minister
DP412		Mr Robin Troy		Policy NE 6	Coastal National Park	Objecting	The boundaries of the coastal national park should be redrawn around existing industrial, commercial and residential areas;	I accept and applaud the need for the protection of important ecological areas in coastal areas, however, I do not accept that the extent of the coastal national park as shown in the 2009 Draft Island Plan is reasonable or acceptable; indeed, the coastal national park extends in places considerably inland up major valleys in the Island. The widely drawing nature of the coastal national park (more than 50% of the total Jersey coastline) includes residential and commercial areas such as Bouley Bay, Greve de Lecq and the Five Mile Road and their inclusion could severely prejudice individuals and businesses in the free right to live, earn a living and develop their homes and businesses in a reasonable and balanced way. The concept of the coastal national park, although acceptable in general terms, is unacceptable to the extent of the area involved, which is a considerable proportion of the land mass of Jersey. The coastal national park should be considered as a tool to protect important areas of bird-breeding colonies and other ecological habitats and important sites and not arbitrarily affecting, residential and industrial/commercial areas merely because of their position on or near the coast.	Reject	The premise upon which the definition of the Coastal National park is drawn is that it is designed to protect the most sensitive and vulnerable coastal landscapes in the Island. Owing to the size and scale of Jersey, it is inevitable that this area will include existing buildings and land uses which will have an impact upon the character of that area. In order to protect and manage the impact of future development upon the character of the Coastal National Park it is, therefore, essential that the spatial extent of the park embraces those uses and buildings which, if they are developed in the future, may have an impact upon it. To exclude them from the boundaries of the park would seriously undermine the objective of the designation. It is also relevant to note that the proposed policy regime set out in NE6 gives explicit recognition to the existence of buildings and land uses within the proposed park and seeks to ensure that provision is made to enable appropriate forms of development as exceptions to the	The Minister is not minded to amend the draft Plan



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										general presumption against any new development.	
DP456		Mr Charles Alluto	The National Trust for Jersey	Policy NE 6	Coastal National Park	Objecting	In terms of possible permitted development the Trust believes that height and footprint are crucial planning criteria when assessing such applications and that specific guidelines should be incorporated into the policy to avoid ambiguity. Please see attached letter to the Minister dating from the 22nd September 2009.		Noted	The issues highlighted are adequately addressed in policies GD5 and NE6	The Minister is not minded to amend the draft Plan as the issues raised are considered to be adequately addressed
DP457		Mr Charles Alluto	The National Trust for Jersey	Policy NE 6	Coastal National Park	Objecting	(iii) The Trust would suggest that greater clarity is given as to what is permissible in terms of new or extended cultural and tourism facilities in the Coastal National Park ie is this limited to those permissible under Policies NE8 and EVE 3?	The Trust would request that any ambiguity or potential misinterpretation is avoided as per the clarity afforded under Policy EVE 1.	Reject	It is considered that the cross-referencing of the policy, to NE8: Access and awareness in the countryside, and EVE3: Tourism support facilities in the countryside, makes it clear as to the scale and form of cultural and tourism attractions that are considered permissible within the Coastal National Park, which is further supported by the clarity provided in EVE1: Visitor accommodation, attractions and cultural attractions.	The Minister is not minded to amend the draft Plan as the issues raised are considered to be adequately addressed
DP458		Mr Charles Alluto	The National Trust for Jersey	Policy NE 6	Coastal National Park	Objecting	The Trust believes that the redevelopment of commercial buildings for other uses in the Coastal National Park should only be permitted where it would give rise to substantial and demonstrable environmental gains. Please see Zone of Outstanding Character policy in the existing Island Plan.		Reject	It is considered that the reference to 'significant demonstrable environmental gains and make a positive contribution to the repair and restoration of the landscape and seascape character of the area through a significant reduction in their visual impact and an improvement in the design of the buildings that is more sensitive to the character of the area and local relevance.' is sufficiently robust to enable appropriate regulation of the redevelopment of commercial buildings in the Coastal National Park	The Minister is not minded to amend the draft Plan as the issue raised is already adequately addressed
DP46		Mrs Lyndsey McGillivray		Policy NE 6	Coastal National Park	Supporting		I fell it is necessary to keep the national park free from development and keep it for our future generations to enjoy	Noted	Noted	Support is noted by the Minister
DP47		Mr Jamie Copsey		Policy NE 6	Coastal National Park	Supporting	I think this is a fantastic idea and I feel very hopeful about the future, should this plan become a reality. Please do not water it down!		Noted	Noted	Support is noted by the Minister
DP49		Sanne Terry		Policy NE 6	Coastal National Park	Supporting	I would like to express my strongest support for the proposed national park.		Noted	Noted	Support is noted by the Minister
DP510		Mr Paul Harding	The Associati	Policy NE 6	Coastal National	Objecting	We suggest Policy NE6 clause 2 requiring where residential buildings are redeveloped there must be	There are a lot of poor quality buildings in this zone that would improve the zone from their	Reject	The policy does not prescribe a reduction in the size of buildings.	The Minister is not minded to

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			on of Jersey Architects		Park		a visual impact reduction is unreasonably onerous.	visual improvement without any scale related reduction.		A reduction in the visual impact of a building need not necessarily be just related to scale and can be achieved through architectural design; the use of alternative materials; the appropriate use of colour; and the appropriate use of hard and soft landscaping.	amend the draft Plan
DP76		Mr Stephen de Gruchy		Policy NE 6	Coastal National Park	Supporting	I am strongly in favour of this.		Noted	Noted	Support is noted by the Minister
DP814		Mrs Susan Kerley		Policy NE 6	Coastal National Park	Supporting	I endorse the suggestions and comments made by the National Trust for Jersey on these policies and proposals		Noted	Noted	Support is noted by the Minister
DP898		P Le Saux		Policy NE 6	Coastal National Park	Objecting	I think the 2002 Plan dividing the Island into three zones, Outstanding Character, Green Zone and Countryside Zone still applies but, to use your terminology under different headings. Coastal National Park, Open Space/Buffer Zone (ex Green Zone) and Green Zone (ex Countryside Zone)	I think a Open Space/Buffer Zone, as shown on the 2002 Plan as Green Zone of more depth, is required to promote the aims of the National Park Status and forms a buffer corridor for natural beauty or wildlife to succeed. It also gives more protection to Headlands, Agricultural land, Wetlands, Marshes, Water resources, catchment areas, Escarpments, Valleys, Biodiversity etc. When I saw the 2009 Green Zone Map at the St Ouens Planning Dept tour I told your officer it was a mistake, it leaves the whole of the Island open to become a building site. Planning applications will increase because it is open season. At least with the 2002 Plan you only had to look at the plan to realise what you could or couldn't do and where there were boundaries - a visual and easy to understand. I read through part of the 2009 Plan last week and across the following- Green Zone 1 - described as interior agricultural landscape that covers the greater part of the plateau page 102 para 2.74 Green Zone 2 - described as valleys, escarpments, northern farmland and parts of undeveloped coast and costal plain page 109 para 2.87 Even your 2009 Plan supports my theory of three zones, it you are going to differentiate surely the same rules and regulations cannot apply to Green Zones. People need large open space to get away from it all - wildlife need large open space to mark their territories and their hunting areas and keep away from creeping domestication and predators. What is the point of going for a quiet walk along a coastal path or across a headland when you have got housing estates and eyesores a few feet away. I think we have got to protect our large open spaces now whilst we have still got a chance. Sadly it is too late for the Noirmont and Corbiere headlands but it is not too late to try and salvage what is left of these headlands.	Reject	The reclassification of the countryside into two simple planning zones i.e. the Costal National Park and the Green Zone provides a simpler and more easily understood planning policy regime than that which exists in the 2002 Island Plan where, in practice, there is very little differentiation in the determination of planning applications between the Green Zone and the Countryside Zone. The current proposals also provide an explicit requirement to assess the impact of development upon the countryside character of the area, as set out in the Countryside Character Appraisal, which should enable a more objective and considered appraisal of the impact of new development proposals. It is also relevant to note that the general presumption against new development in the Coastal National Park and the Green Zone is upheld by Policies NE6 and NE7	The Minister is not minded to amend the draft Plan

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DP904		Mr James Godfrey	Royal Jersey Agricultural & Horticultural Society	Policy NE 6	Coastal National Park	Objecting	1. The creation of a 'National Park' will lead to a 'two tier' countryside which the plan has sought to remove by merging the 'Green Zone' and 'Countryside Zone' under the 2002 Island Plan into the new 'Green Zone' (2009 Draft Island Plan). The status applied to the proposed 'National Park', which largely replaces the 2002 'Zone of Outstanding Character' should be applied to the proposed new 'Green Zone'. It is felt that this change would be closer to the results of the public consultation process undertaken in developing the 2009 Draft Island Plan.	The RJA&HS is broadly supportive of the key plan policies and is encouraged to note that there is an increased emphasis on resource protection and sustainability. That said the RJA&HS believes that the plan needs to positively state the reasons behind the need for resource protection, particularly in relation to the countryside, and further enhance the powers to protect agricultural land. Protecting the countryside as a resource: It is important that the rural areas of the Island are afforded the highest degree of protection and whilst the reasons for this may be taken as given it is felt important that they are highlighted to reinforce the basis of policy. The following should be iterated as the thesis for protection of the countryside as a valuable resource: The Island's countryside is different to most in Europe in that it has evolved as a highly intimate mix of land uses. This leads residents and visitors to feel 'closeness' to the community through a proximity which is not achieved in most other regions where there are distinct boundaries between different 'zones'. It is important to maintain the mix and balance of land use which people find of interest and leads to their enjoyment of the Island as a place to live and visit. The greatest threat to this currently is development. The beauty of the Island's countryside and natural areas are cited by visitors as the most important factor in their decision to visit and what they enjoyed the most. If the Island is to retain, and grow, a visitor economy in the future then protection of this resource must be core to that objective. The attraction, and retention, of highly mobile and wealthy individuals who contribute disproportionately to the success of the local economy is influenced by the natural beauty of the Island's environment. It is therefore important to retain, and improve, the character of this resource.	Reject	It is considered that the general thrust of the draft Plan, to protect the countryside and to seek to achieve the Island's development needs within the existing Built-up Area, is clearly set out in the Strategic Policies of the draft Plan. This is complemented by more detailed policies which set out how the countryside is to be protected, represented specifically by policies NE6 and NE7 which essentially relates to the Island's most sensitive landscape areas (the Coastal National Park) and the remainder of the countryside, effectively represented by the agricultural interior. Both of these areas have been defined through objective study, represented by the Countryside Character Appraisal. The highest level of protection is thus justifiably applied to the most sensitive landscape areas, represented by the CNP. A high level of protection is also applied to the agricultural interior, represented by the Green Zone. In both areas, there is a general presumption against new development. In determining the policy regime for these areas, there is a need to recognise that they comprise a living and working environment and that they have existing land uses and buildings within them which, to some extent, sustain and manage their landscape character and quality. On this basis, the policy regime needs to strike an appropriate balance between permitting reasonable forms of development of an appropriate scale within these areas, whilst seeking to ensure that their character is not eroded and, where possible, that it is enhanced through the redevelopment of existing buildings and land uses to more	The Minister is not minded to amend the draft Plan

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										sympathetic forms.	
DP973		Mr. Maurice DUBRAS		Policy NE 6	Coastal National Park	Supporting	Coastal National Park - (p 94) I applaud the concept of such a park as much more appropriate, though ambitious, than simply looking to identify St Ouen's. That is not to deny that the latter is extremely important as addressed by the Planning Framework established by the then committee before the 2002 Plan. What your proposal now confirms is the importance that the general public ascribe to our special attribute of a very varied and beautiful coastline and offshore reefs that have to be protected. I attended 'the line in the sand' event and I trust that you are reflecting the strong message sent to the States as a whole by that public demonstration. As mentioned above, it is within this concept that the reality of 'no-take' marine reserves could well be inserted, after due consultation, and I urge you to take that step in law and within the Plan. Of course I maintain my previous support for the RAMSAR sites of international importance. I trust that the above can assist in their extension to other areas. The Plémont case is one which, though it has to be considered by you within the existing Plan, needs to be addressed as part of the proposed Plan. My belief is that it would be quite proper that any proposal should be made within the existing approved use at the very most, if indeed the area cannot be acquired by the public and returned completely to nature. The notion of an ongoing tourism asset such as a golf course, with related and carefully designed buildings blending in to the background, appears not to have been given full consideration. The agreement of many land-owners involved may of course be problematic.		Noted	Noted Any new proposals for Plement would be considered within the policy regime applicable at the time. The former holiday camp site is out with the proposed boundary of the Coastal National Park	Support is noted by the Minister
DP459		Mr Charles Alluto	The National Trust for Jersey	Proposal 5	Coastal National Park Management Plan	Neither	The Trust would kindly request that a Management Plan is drawn up within 2 years of the new Island plan being adopted.	If there is a true commitment to the concept of a national park it is essential that this is adequately resourced and prioritised. It has been 10 years since a management plan was promised as part of the St Ouen's Planning Framework but this has yet to materialise. It is therefore essential that a firm and achievable target date is established at the beginning of the Plan.	Noted	It is envisaged that a NP Management Plan would take around 12 months to develop and would be reviewed on a quinquennial basis from thereon in. The development of the management plan would be subject to the availability of resources. Appendix A sets out timescales for the development of SPG	Noted by the Minister
DP524		Mr Paul Harding	The Association of Jersey Architects	Proposal 5	Coastal National Park Management Plan	Supporting	Proposals 1-14 & Policies BE1-BE3 - St Helier and other Regeneration / Local Development Zones We welcome and support the principal thrust of these sections, the proposals and Policies.		Noted	Noted	Support is noted by the Minister
DP77		Mr		Proposal	Coastal	Supporting			Noted	Noted	Support is noted

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		Stephen de Gruchy		5	National Park Management Plan						by the Minister
DP931		Mr James Godfrey	Royal Jersey Agricultural & Horticultural Society	Proposal 5	Coastal National Park Management Plan	Neither	Coastline: The protection of the undeveloped coastline is of the highest importance as this provides the most appropriate area for public recreation in outdoor spaces. Resources should not be expended in creating new footpaths but instead be put into improved maintenance of the existing extensive network.		Noted	This is management issue which can and ought properly to be considered and addressed as part of the development of the Coastal National Park Management Plan	Noted by the Minister
DP286		Mrs Penelope Lee			Green Zone	Supporting			Noted	Noted	Support is noted by the Minister
DP511		Mr Paul Harding	The Association of Jersey Architects		Green Zone	Supporting	We welcome absorbing the Countryside Zone within the Green Zone being the principal simplification in the 2009 Draft Plan - particularly as the 2002 Plan policies were identical!		Noted	Noted	Support is noted by the Minister
DP287		Mrs Penelope Lee		Map 2.5	Green Zone	Supporting			Noted	Noted	Support is noted by the Minister
DP1035		Ray Shead	The Jersey Chamber of Commerce	Policy NE 7	Green Zone	Objecting	The presumptions against development in the Green Zone are very restrictive and in most cases will be difficult to argue against. The Draft Island Plan should give enough flexibility in order to encourage development which will provide the Island with a better sustainable policy in terms of location of offices, shopping and leisure. If the Draft Island Plan is to reflect other States objectives of becoming greener, more sustainable and reducing traffic, then the Draft Island Plan should reflect this in its objectives. Village settlements which have diversity within them to cater for the needs of local people should be encouraged. The Draft Island Plan must reflect a flexible approach to regeneration to meet the future demands for a sustainable society.		Reject	The presumptions against development in the Green Zone reflect the Spatial Strategy of the draft Plan, as set out at SP1, and seek to support the objective of meeting most of the Island's development needs from within the existing Built-up Area, which is considered to be a sustainable approach to development in Jersey	The Minister is not minded to amend the draft Plan
DP288		Mrs Penelope Lee		Policy NE 7	Green Zone	Supporting	Against more agricultural sheds - they all seem to end up as being used for other business use that increases traffic and litter		Noted	Noted	Support is noted by the Minister
DP369		Mr Howard Snowden	Jersey Water	Policy NE 7	Green Zone	Neither	Jersey is reliant on the collection and storage of surface waters for its public water supply. The majority of Jersey Water's installations are located within areas designated as Green Zones. These installations, which comprise, stream collection ponds, pumping stations and treatment works are vital to the provision of the public water supply. It is likely in future years that many of these installations will require to be modified, upgraded and expanded, not only to meet increased demands for water but to meet new drinking water quality standards, health & safety requirements and		Reject	It is considered that the penultimate paragraph of Policy NE7, together with the provisions of Policy NR13, and the supporting justification thereof, give due recognition to the potential requirement for the development of new or expanded infrastructure provision in the Green Zone for operational reasons.	The Minister is not minded to amend the draft Plan as it is considered that the issues raised area already adequately addressed



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							technological changes. We request that due cognizance is given to the above, when formulating planning criteria for the Green Zones, so as to allow Jersey Water to meet its obligations in supplying adequate volumes of water to future standards.				
DP384		Mr and Mrs Lees-Baker		Policy NE 7	Green Zone	Objecting	1. The existing countryside and green zones should not be merged. (Objecting)	1. We feel the green zone warrants a higher degree of protection and by merging the two there is a perception of 'watering down' the importance of the green zone.	Reject	The countryside policy has been subsumed into the new green zone policy NE7 giving more protection against development and greater reliance on the Countryside Character Appraisal.	The Minister is not minded to amend the draft Plan
DP460		Mr Charles Alluto	The National Trust for Jersey	Policy NE 7	Green Zone	Objecting	The Trust believes that the redevelopment of commercial buildings for other uses in the Green Zone should only be permitted where it would give rise to substantial environmental gain. Please see Green Zone policy in the existing Island Plan.		Reject	It is considered that the test set out at Policy NE7(c)(ii) is sufficiently robust to enable appropriate levels of environmental gain to be secured in the Green Zone through the redevelopment of existing commercial buildings.	The Minister is not minded to amend the draft Plan
DP618		Mr Martin Buckfield		Policy NE 7	Green Zone	Supporting		I am writing to advise you that my wife and I fully support the rezoning of the Petit Ménage area of St.Saviour from countryside zone to green zone which includes fields 802b, 804, 805, 807, 808, 809 and all adjoining fields as currently highlighted as Green Zone on the Draft Island Plan Map	Noted	Noted	Support is noted by the Minister
DP761		A H Harris		Policy NE 7	Green Zone	Supporting	Guardianship of agricultural land. While the agricultural industry is less strong than heretofore, agricultural land remains the means by which our rural environment is preserved and maintained. Other uses such as grazing, and horse grazing can preserve that environment. I do not agree that we should build on fields that do not meet a particular production level, nor should they be absorbed into domestic gardens with the resultant domestic clutter of bar-b-ques, climbing frames, sheds and greenhouses. While one might be tempted to consider that a garden (or a golf course!) is green and the same thing, clearly non-indigenous species of trees and plants appear, or manicured turf, and the land no longer resembles the countryside . It is also an important amenity to maintain open views across the countryside, unless hedges are required to protect livestock and crops. This allows everyone to enjoy the environment. I have often heard the mantra that we are not entitled to a view, I think this standpoint should not apply in every case, and especially not in the case of open land.		Noted	Noted	The Minister notes the support for the protection of the countryside and agricultural land
DP78		Mr Stephen de Gruchy		Policy NE 7	Green Zone	Supporting	Paragraph (g) on page 109 seems to me to be inconsistent with the philosophy of a Green Zone. The adoption of a Green Zone is because the restriction of further development in the designated zone is seen to be in the Island's interest. How then can Policy NE7 allow for an		Reject	The planning policy framework provided by the Island Plan will never be entirely definitive or prescriptive and the planning law provides the Minister with flexibility to depart from it, where	The Minister is not minded to amend the draft Plan

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							exemption which would allow "large scale developments [in the Green Zone]... proven to be in the Island interest"? I am therefore of the view that paragraph (g) should be deleted or re-drafted so that any application that purports to be made pursuant to that paragraph should require 'in-principle' approval by the States Assembly.			he considers there to be sufficient justification for doing so. This provision in the Green Zone policy simply seeks to recognise this possibility and to define the basis upon which consideration might be given to any such proposal. It is likely that this provision would only apply to public or utility infrastructure provision. The Minister may subject any such proposal to a Public Inquiry, to ensure rigorous and independent scrutiny, before he or she determines the matter. Referral of planning applications to the States is not considered to be an efficient and effective form of government but it remains within the Ministers gift should he or she decide to do so.	
DP816		Mrs Susan Kerley		Policy NE 7	Green Zone	Objecting	I endorse the suggestions and comments made by the National Trust for Jersey on these policies and proposals		Reject	It is considered that the test set out at Policy NE7(c)(ii) is sufficiently robust to enable appropriate levels of environmental gain to be secured in the Green Zone through the redevelopment of existing commercial buildings.	The Minister is not minded to amend the draft Plan
DP868		Mr Robin Troy		Policy NE 7	Green Zone	Objecting	I object to the manner in which the green zone has been drawn, as again it is too extensive and especially the manner in which, adjacent to urban areas, many gardens of residential properties are included in the green zone up to the face of buildings. This practice is manifestly wrong and unreasonable. Furthermore, I would propose that, in the case of residential properties situate wholly within the green zone, that gardens under half a verge (20 perches) should be excluded from the green zone. The green zone is too large and should be re-drawn around urban areas so as not to include existing gardens and open spaces and also should not include, in respect of residential areas in the green zone, gardens of under half a verge; The policies under the 2002 Island Plan, in connection with the green zone, should be retained and not become further prohibitive;		Reject	The objective of the Green Zone policy is to protect the character of the countryside. The draft Plan recognises that there are existing buildings and land uses within it which is why it sets out a number of exceptions to the general presumption against development within the zone. To exclude residential properties or gardens of a certain size from the Green Zone designation, when they presently have an impact on the character of the countryside and when future development proposals may have an impact on the same, would serve to undermine the objective of the policy. The development of some gardens on the edge of the Green Zone could serve to adversely impact upon the character of the countryside. The exemptions set out in the policy allow for	The Minister is not minded to amend the draft Plan

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										reasonable levels of development normally associated with domestic properties. Individual representations against the inclusion of gardens at the edge of Green Zone will be dealt with on a case by case basis, and treated on their merits.	
DP956		Deputy Philip Rondel	Parish of St John Working Party	Policy NE 7	Green Zone	Neither	The areas around both villages to be protected (Consultation Reference Proposal 4, Policy NE7 and Landscape management Strategy 2.8 7) There is a need to be able to protect the 'Villages', the residents of those 'Villages' and other parishioners from unsympathetic development over which the Parish and its parishioners have no control. Sympathetic small-scale, planned development where and when needed is very important to maintain the integrity and character of the 'Villages'.		Noted	The villages of Sion and St John's Village are both defined as Built-up Area around which is Green Zone. Development proposals in these areas will need to respect both the character of the villages themselves and also the surrounding landscape. Any applications out with the defined BUA will fall to be considered in terms of their impact upon the character of the countryside under the terms of Policy NE7. Policy GD1 will apply within the villages where the character of built environment will be a material consideration (GD1(2)(c)).	Noted by the Minister
DP974		Mr. Maurice DUBRAS		Policy NE 7	Green Zone	Supporting	Green Zone The expansion of the existing green zone to incorporate the current countryside zone is a bold one and one which I support. Apart from the simplification aspects for the public and the planners, this approach does raise issues of concern over some of the exceptions that have been allowed in recent years which appear to have breached the principles outlined now in the Draft Plan. My question is whether they have established 'new policy' from which it will be very difficult to row back? I refer later to the aspect of Important Open Space (IOS) within the Built Environment; one must not lose sight of the connection between the Green Zone and IOSs and how in the past some of the former countryside has in fact become part of or be deemed within the built-up area(s).		Noted	Noted	The Minister notes the qualified support for this policy
DP1003		Mr John Mesch	Council for the Protection of Jersey's Heritage		Landscape Management Strategy	Objecting	6. Remarkably, other than the new Coastal National Park the draft plan lacks a sufficiently clear policy statement which is needed to protect our historic and beautiful coastal and rural landscapes that are an essential part of our cultural heritage. It is relevant here that the Council of Europe has recommended that the governments of member states should shape policies for cultural landscape area conservation and managed evolution within the context of general landscape policy. This is described in detail in the Appendix to		Reject	It is considered that Policies SP1 and SP4 provide clear and strong statements about the intent of the draft Plan to protect the character of the Island's countryside and coast, which is further supported by a detailed planning policy regime, principally set out by Policies NE6 and NE7. Proposal 6, together with that at Proposal 5, seeks to	The Minister is not minded to amend the draft Plan as the issues raised are already addressed

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							Recommendation No. R (95) 9. At present this deficiency in the draft plan is only covered by Proposal 6 which refers to a future Landscape Management Strategy. The draft plan therefore lacks even a statement of general landscape policy and serves to illustrate our belief (See 2 above) that a proposal cannot be part of plan.			address the issues of the development of management plans for the management of landscape, which is distinct from the considerations of a land-use planning policy document.	
DP289		Mrs Penelope Lee			Landscape Management Strategy	Supporting			Noted	Noted	Support is noted by the Minister
DP961		Deputy Philip Rondel	Parish of St John Working Party		Landscape Management Strategy	Neither	It is recognised that some good work was done in this area in the recent past by the St John Tree Planting group. However it is felt that further tree planting and landscaping needs to be addressed both within the 'Villages' and within the Parish to enhance the facilities for parishioners' for a better quality of enjoyment of the Parish.		Noted	Noted	Noted by the Minister
DP290		Mrs Penelope Lee		Proposal 6	Landscape Management Strategy	Supporting			Noted	Noted	Support is noted by the Minister
DP461		Mr Charles Alluto	The National Trust for Jersey	Proposal 6	Landscape Management Strategy	Supporting	The Trust very much welcomes the proposal for a Landscape Management Strategy as it did for the existing Island Plan. However, for this proposal to have substance it is essential that a firm target date is set for its completion.	The existing Policy C8 has not been acted upon despite having been adopted by the States 8 years ago.	Noted	Noted	The Minister notes the qualified support for this proposal and will seek to progress this strategy subject to the availability of resources
DP525		Mr Paul Harding	The Association of Jersey Architects	Proposal 6	Landscape Management Strategy	Supporting	Proposals 1-14 & Policies BE1-BE3 - St Helier and other Regeneration / Local Development Zones We welcome and support the principal thrust of these sections, the proposals and Policies.		Noted	Noted	Support is noted by the Minister
DP79		Mr Stephen de Gruchy		Proposal 6	Landscape Management Strategy	Supporting			Noted	Noted	Support is noted by the Minister
DP817		Mrs Susan Kerley		Proposal 6	Landscape Management Strategy	Supporting	See DP461: NTfJ I endorse the suggestions and comments made by the National Trust for Jersey on these policies and proposals		Noted	Noted	The Minister notes the qualified support for this proposal
DP291		Mrs Penelope Lee		Policy NE 8	Access and Awareness	Supporting	I am in favour of new bridleways and footpaths. Provided they are protected and motorcycle use in particular is banned.	There are currently very few bridle paths and the roads are increasingly dangerous for horse and bicycle riders. I am very concerned about the huge increase of litter in our countryside, no measures should be allow this to increase	Noted	Noted	Support is noted by the Minister
DP80		Mr Stephen de		Policy NE 8	Access and Awareness	Supporting			Noted	Noted	Support is noted by the Minister

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<b>Historic Environment</b>											
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.
DP292		Mrs Penelope Lee		3	Historic Environment	Supporting			Noted	Noted	Support is noted by the Minister
DP393		Mr Nicolas Jouault		3	Historic Environment	Neither	In some cases it is difficult to find out or interpret the classification and protection a building has, for example the harbours are historic buildings but they are not treated as such, much of the character of the Albert pier has been lost to cater for the need to place modern buildings on or along side it, where was the protection there? Some historic fabric comes to light during a development more effort and manpower should be employed to record such things that are going to be lost for ever.		Noted	The comments made about classification are relevant to the review of the historic environment regime, which is ongoing. Any heritage asset, designated as such, where it is affected by development proposals would fall to be considered under the policy regime set out in the draft Plan, and where there would be a presumption against the loss of historic fabric, including harbours. It needs to be recognised, however, that the value of heritage is one consideration in the determination of planning applications. Policy HE1 and HE5 include provision for recording and publication of findings where historic fabric is to be lost or damaged as a result of development activity.	The Minister notes the comments but is noted minded to amend the draft Plan as the issues are adequately addressed
DP407		Mr Antony Gibb		3	Historic Environment	Neither	Please ensure that issues to do with historic built environment follow current UK thinking as set out in PPS5, which replaces PPGs15 and 16.	To ensure that Jersey policy does not lag behind current UK thinking.	Noted	The Minister and the department is cognisant of the changes being introduced in the UK and is monitoring these relative to the ongoing review of the historic	Noted by the Minister



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										environment protection regime in Jersey	
DP560		Deputy John Le Fondre		3	Historic Environment	Neither	<p>Historic Environment - the historic environment mainly seems to apply to historic buildings which would seem logical. However I think there should be some form of recognition and protection for some of our historic footpaths. For example, there are a number of sanctuary paths, there is the Corbiere railway walk, I am aware of at least one chemin des morts (to the churchyard), and some mill paths. In certain cases ownership is clear, and is subject to covenants, in other cases it is not. This is not about controlling access - a number of these paths are (rightly) multi use (pedestrians, horse riders and cyclists), and such multi use should continue. However to me, over time, there is always some threat over eroding the tranquillity / utility of such routes. For example by the potential threat of allowing private developers to cross such paths in order to gain better motor traffic access to a site, or for some other purpose. Therefore should there be some form of protection granted to such routes to ensure that the value of such routes is not lost over time?</p>		Noted	<p>Not necessarily an issue for the policy framework of the Island Plan as it is more related to whether or not these routes ought to be designated as heritage assets (and thus be subject to the policy regime relating to the historic environment). However, designating such features as individual sites poses some challenges: taking the examples given - the sanctuary paths (perquages) are believed to have run from each parish church to the coast - mostly following streams in a southerly direction. Some of these paths run for miles from the north of the island but the exact routes are open to debate - there are small stretches still called the Perquage e.g. Castle Street. There also remains the issue as to why protect just these features? Whilst they are undoubtedly of historic interest, the same would apply, perhaps with greater cultural significance, to the island's early road network, old railway lines and mill paths, some of which may be older and which may have had a more significant impact on the historical development of the Island. There are some streets with early road surfaces that are designated and protected because of their historical significance e.g. Waterloo Lane and Hilgrove Street (although the latter now questionable) and there may be a case for other early road surfaces. But if we protect the routes of old paths, why not the banques and fosses and field boundaries - some of which may date to the Bronze Age? A more appropriate response may be the undertaking of an Historic Landscape Assessment to identify and understand the historic</p>	The Minister notes the comments made but is not minded to amend the draft Plan.

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										development of today's landscape - emphasising the contribution that past historic processes make to the character of the landscape as a whole, not just selected 'special sites' which would help to guide decisions on future change and management on a more informed basis. This is an emerging area of policy development in the UK which will be kept under review. Notwithstanding the above, any such routes that are part of the Island's footpath and cycle network would be protected, relative to their function in providing access, under Policy TT1.	
DP678		Mrs Sue Lissenden		3	Historic Environment	Neither	In all the words written about archaeology, nothing is said about the huge volume of work already undertaken by the Societe Jersiaise, most of it at a time when there was no governmental involvement at all. This is mean-spirited. There is a reference, later but not specific, to stakeholders, and it might be supposed that would include the Societe, but it does not say so.		Noted	The considerable role of the Societe Jersiaise in contributing to the knowledge of the Island's archaeology is fully acknowledged in the Supplementary Planning Guidance Note: Archaeology and Planning (January 2008)	The Minister notes the comment but is not minded to amend the draft Plan
DP737		Paul Harding	The Association of Jersey Architects	3	Historic Environment	Objecting	7.1 Whilst fully appreciating and supporting the need to take special care of our historic built inheritance, several AJA members expressed the view the section on Historic Environment section has now become overly restrictive in its policies towards old buildings.	There is a perception an antidevelopment culture now predominates in case of historic buildings, making them immune from the worldly concerns and pressures that the rest of the Island Plan seeks to address ? ie: planning for future development. It is obviously important that the section on Historic Environment does not exist within a vacuum and some acknowledgement of this within the wording of the new Island Plan would be helpful.	Reject	The principles upon which the strategic approach to the historic environment are soundly based and reflect the Minister's and the States obligations, as set out through law, international convention and the States Strategic Plan. The Plan explicitly acknowledges, in 3.3-3.6, the need for change and the potentially adverse implications of this, in some cases, for historic fabric: the starting point, however, is that there ought to be a general presumption against the loss of heritage assets as they represent a finite and irreplaceable resource.	The Minister is not minded to amend the draft Plan.
DP760		A H Harris		3	Historic Environment	Neither	Importance of honouring our heritage Not only should we ensure that our important buildings are protected, we should also ensure that they sit in an appropriate setting. Where a Church or an SSI sits amongst green fields, every effort should be made to preserve the setting. Where a property is designated as an SSI, I believe all elements of the listing should be carefully noted and included within		Noted	The setting of heritage assets is specifically recognised and identified as a material consideration in Policy HE1 and Policy HE3, relating to Conservation Areas, seeks to ensure that character and appearance of an historic area,	The Minister notes the comments made but is not minded to amend the draft Plan as the issues raised are already addressed

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							the Notice. If the listing includes perimeter walls this should also be recorded and included on the Notice. Any important trees that add to the scene should be the subject of a tree preservation order. It is not enough to expect a dynamic or unwitting developer to understand exactly what is included without specifically saying so. The planning department can therefore expect any element omitted to be extremely vulnerable. Once a tree has been felled or a wall demolished it is too late, and everyone, especially the developer, knows this.			designated as a Conservation Area, is also considered and protected. The issue of defining those items of interest on an SSI schedule is noted but is not material to the Island Plan itself but is more relevant to the process of Listing.	
DP293		Mrs Penelope Lee		Objective HE 1	Historic Environment Objectives	Supporting			Noted	Noted	Support is noted by the Minister
DP81		Mr Stephen de Gruchy		Objective HE 1	Historic Environment Objectives	Supporting			Noted	Noted	Support is noted by the Minister
DP294		Mrs Penelope Lee			Buildings and Places of Architectural and Historic Interest	Supporting			Noted	Noted	Support is noted by the Minister
DP418		Mr Marc Burton	Institute of Directors		Buildings and Places of Architectural and Historic Interest	Supporting	The IoD members strongly support the need to review the island's listed buildings and buildings of special interest with a view to opening up some sites for development and creating much better and clearer policy for designation of such sites going forward; See attached letter		Noted	Whilst not an issue for the Island Plan, an integral element of the Review of the Historic Environment Protection Regime is a comprehensive re-survey of all existing and potential heritage buildings and sites in Jersey, to be undertaken under the auspices of a revised designation system. This should ensure that only those buildings and places worthy of protection are protected and that the reasons for their protection are clear and accessible. This work is schedule to take place, subject to the availability of resources, in 2010-2011.	The Minister notes the comments but is not minded to amend the draft Plan
DP1036		Ray Shead	The Jersey Chamber of Commerce	Policy HE 1	Protecting Buildings and Places of Architectural and Historic Interest	Objecting	Some members would like to see a total review of all Listed Buildings. Some flexibility needs to be introduced into this policy. There are buildings in a very poor state of repair that would benefit from deregistration , particularly where they are stopping any further development of a site. Internal equipment that has no benefit should not be listed. It is agreed that there should be a strict process of recording of fabric and internal fittings prior to demolition. This policy should not hinder The		Reject	Whilst not an issue for the Island Plan, an integral element of the Review of the Historic Environment Protection Regime is a comprehensive re-survey of all existing and potential heritage buildings and sites in Jersey, to be undertaken under the auspices of a revised designation system. This should ensure that only those	The Minister is not minded to amend the draft Plan

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							Planning Minister's intention to regenerate St Helier.			buildings and places worthy of protection are protected and that the reasons for their protection are clear and accessible. This work is schedule to take place, subject to the availability of resources, in 2010-2011. This policy is flexible. The state of a building is not material to a decision about whether it is of heritage value (e.g. Grosnez Castle). The viability of the beneficial re-use of a heritage asset is, however, material to the determination of a planning application which might affect the historic fabric of a designated building. The starting point, however, always ought to be a presumption against the loss of heritage assets. Where the interior of a building is of special interest, it is appropriate to highlight the significance of this part of the asset and to consider it in the development process. Where the retention of interior features, fixtures and fittings might unduly constrain the beneficial re-use of an historic building then the Minister should weight the public interest and value of their retention against the potential community benefit of any proposed development. The policy enables the Minister to do this.	
DP295		Mrs Penelope Lee		Policy HE 1	Protecting Buildings and Places of Architectural and Historic Interest	Supporting			Noted	Noted	Support is noted by the Minister
DP462		Mr Charles Alluto	The National Trust for Jersey	Policy HE 1	Protecting Buildings and Places of Architectural and Historic Interest	Neither	The Trust would like to suggest that the definition of historic fabric is widened to include internal fittings, decorative schemes, as well as external items such as railings and gates etc.		Noted	The Minister is able to exercise control over works, whether they amount to development or not, where they have the potential to adversely affect the special interest of a building or place, where that building or place is Listed. Thus, proposals affecting	The Minister notes the comment but is not minded to amend the draft Plan as the issue is adequately addressed

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										any historic fabric deemed to be part of the special interest of the building or place can be regulated. The definition offered is not meant to be comprehensive.	
DP702		Mr Mark Syvret	Romerils	Policy HE 1	Protecting Buildings and Places of Architectural and Historic Interest	Objecting	<p>[Page 46; section 2.53] makes reference to conservation and sustainable economic growth being complementary objectives and should not be seen as being in opposition to one another. In addition economic prosperity can secure continued vitality and the continued use and maintenance of historic buildings, we SUPPORT these arguments, if exercised pragmatically. However it is with regret that this has NEVER been the practical outworking in our experience with the BLi listing of the facade of our Dumaresq Street building. We fear that the categorical and inflexible wording used in the Draft Island Plan will be catastrophic for the future use of this particular building. Our comments are specific to the BLi listing on the Romerils building; however, the logics will apply to other commercial listings. [Page 115 section 3.9] states that there will be one form of site specific designation in the form of a site of special interest. Therefore we presume that all current listings will be governed by [Page 119; Policy HE I.] [Page 119; section 3.19] "It should be noted that controls apply to the whole of a protected site, not just the front elevation or the main building." Currently the Romerils building has BLi status for the facade only, so in future the whole of the site and not just the front elevation will be listed and in conjunction with [3.16] we would be expected to use traditional materials. In essence this is a 1960's and 1970's cheaply constructed builder's merchant shop and warehouse. Whilst the facade listing is questionable, it is incomprehensible that the rest of the site would then be listed. While we can see a logic to preserve genuine historic buildings, in this instance the wording is far too absolute, inflexible and economically unworkable. Furthermore under [Policy HEI.I] "permission will not be granted for the total or partial demolition of a protected building." Therefore none of these buildings in the Dumaresq Street and Hue Street area will ever be demolished nor will there be an opportunity for any betterment in this rather run down, scruffy part of town. The life expectancy of these cheaply constructed buildings is nearing the end and it is questionable how much longer Romerils will be able to keep this business viable from this location, but under this proposed wording it will have to remain as it is in perpetuity. This</p>		Reject	<p>The extent of protection for existing historic buildings relates to the whole structure presently: the draft Island Plan is proposing no change in this respect (see existing supplementary planning guidance Managing Change in Historic Buildings. pp.5). Also, there already exists a presumption against the partial or total demolition of a protected building (see G13 of current Island Plan.). What is important, however, is the extent to which any proposed change affects the particular interest of an historic building, including the integrity of the original design. Buildings of Local Interest (BLIs) are essentially designated because of their townscape value i.e. because of the contribution of their external appearance, architectural quality and historic character. In the case of the Romerils building, it is clear that the front of the building is of most interest in this respect. In assessing any particular proposals for change at Romerils, particular attention will therefore be paid to the impact of any change upon the front elevation in particular. Other proposals will also be assessed for their impact upon this particular aspect of the building: where there is no significant harm caused to the particular historic/ architectural interest of the building, then each proposal, will be assessed accordingly. On this basis the existing and proposed policy regime retains an appropriate level of flexibility to accommodate change, whilst ensuring that the particular</p>	The Minister is not minded to amend the draft Plan



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							cannot be logical nor the outcome you desire. Sadly, our experience of the current working approach of the department is inflexible, so it can only deteriorate with the new "enhanced" proposals. To give one example: We, as the client, are unable to meet with planners to discuss this building with our architect. Our architects have to meet planners on one occasion entirely separately from the client. There cannot be a better piece of evidence for such an outmoded, illogical approach, which contradicts [Page 46; section 2.53] B.G. Romeril & Co. Ltd as an organisation have always supported Jersey Government. Furthermore I am not given to emotive language like that which has just been used and is evidence of the frustration, anger and deep concern with which this proposal is being viewed. We therefore OBJECT to [Page 115; section 3.9, Page 119 section 3.19 and Page 119 Policy HE 1.] Suggested change: A complete rethink on the attitude and approach. Delist the Romeril's building. In the interest of clear open constructive Government, I am both surprised and disappointed that these historic building proposals have not been individually sent to each owner of a listed building, they are so dramatic and far reaching that it is inadequate to have left them as single sentences within a body of a document of in excess of 500 pages.			interest of a building, is safeguarded.	
DP818		Mrs Susan Kerley		Policy HE 1	Protecting Buildings and Places of Architectural and Historic Interest	Supporting	I endorse the suggestions and comments made by the National Trust for Jersey on these policies and proposals		Noted	Noted	Support is noted by the Minister
DP82		Mr Stephen de Gruchy		Policy HE 1	Protecting Buildings and Places of Architectural and Historic Interest	Supporting			Noted	Noted	Support is noted by the Minister
DP392		Mr Mark Renouf		Policy HE 2	Protection of Historic Windows and Doors	Supporting	I wish to see a number of changes to policies on windows and doors. The insensitive and ignorant replacing of period windows in particular has ruined the island's built environment in the last 30 years. Fine Georgian buildings in Rouge Bouillon have been ruined by a hotpotch of plastic windows. Elsewhere, townhouses and country farmhouses have been ruined even in recent years by hideous flat plastic windows. The essential architectural	Our existing building stock is a far greater percentage than new builds will ever be, and it is vital to restore what we have properly, if we want to dramatically change the look of our built environment.	Noted	The prosecution of planning infractions is a matter for the Attorney General. Policy HE2, supplementary planning guidance and the approach adopted by the department, seeks to ensure the replacement of modern windows with sympathetic historic fittings in historic buildings. The	The Minister notes the qualified support for this policy

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							feature of window shutters is mostly missing. I have never been particularly aware of prosecutions. What we need to do is to put the onus on the window replacement companies, with hefty fines for breaches of more stringent regulations, so that the cost of policing is removed from the state to those profiting. Nothing will enforce careful compliance than a £50,000 fine on the window company. We also do not need to accept defeat on houses that have been modified - if people want planning permission for changes on their property, they should be expected to restore features which have been removed, by replacing wooden doors, windows and shutters with appropriate replicas. I am concerned that it may not be enough to restrict policies to listed buildings: any post war building may need to be covered in some way. It may be that for some categories or ages of building (eg. non listed buildings prior to 1945), some sort of private sector certification could suffice to avoid burdening the planners with a formal planning permission application. ie: lay down clear guidelines and allow architects to certify that replacement windows are appropriate for the period of building (subjecting those architects to keep records and photos and be vetted occasionally to ensure they are adhering to the rules, otherwise risk losing certification status). It is not that difficult to determine what is an appropriate window or door for a particular period of property - what we need is to stop the free for all of ignorance which is currently ruining our island. In England, in the isle of Purbeck, Cotswolds etc, they have preserved the character of buildings. There is no excuse in Jersey where land costs are much higher, and incomes higher, for the bodged environment we now have to endure looking at. The approach also needs some flexibility, though. We need to consider how double glazing can be facilitated at an appropriate grade of building. I understand that Mumford and Wood can supply double glazing with replica traditional (ie: rippled) glass. Slimlite glass can actually be retrofitted into existing Georgian frames, retaining the classic thin profile of the glazing bars. Too inflexible an approach may condemn our historic buildings to be shunned in future, with rising fuel prices and environmental restrictions on use of energy - we do need to be careful to strike a balance.			introduction of Conservation Areas in Jersey, together with the relevant and associated change to the General Development Order, should ensure that control over the proposed replacement of historic windows and doors is extended to buildings that are not listed but are located within the designated Conservation Area.	
DP463		Mr Charles Alluto	The National Trust for Jersey	Policy HE 2	Protection of Historic Windows and Doors	Supporting	The Trust fully endorses and very much welcomes the objective of protecting historic windows and doors.		Noted	Noted	Support is noted by the Minister
DP819		Mrs		Policy	Protection	Supporting	I endorse the suggestions and comments made by		Noted	Noted	Support is noted

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		Susan Kerley		HE 2	of Historic Windows and Doors		the National Trust for Jersey on these policies and proposals				by the Minister
DP83		Mr Stephen de Gruchy		Policy HE 2	Protection of Historic Windows and Doors	Supporting			Noted	Noted	Support is noted by the Minister
DP464		Mr Charles Alluto	The National Trust for Jersey	Proposal 7	Conservation Area Designation	Supporting	The Trust once again welcomes this initiative but would like to reiterate it is essential that a firm target date is set for its completion.		Noted	Conservation Areas will be designated during the Plan period. Work is ongoing, in parallel with the review of the island Plan, to develop proposals for St Helier. These proposals will be published and consulted upon separately, with any designation being adopted and issued through supplementary planning guidance.	Support is noted by the Minister
DP515		Mr Paul Harding	The Association of Jersey Architects	Proposal 7	Conservation Area Designation	Supporting	We welcome the Policies to introduce Conservation Areas, providing Proposal 7 is rewritten to make it clear they will be specific area with single identifiable unique character.	We have heard suggestions the whole of St Helier may be designated a Conservation Area, within which there will be areas of 'indeterminate' and 'poor' conservation character. Please can we have these sections re-written to avoid risk of such absolute nonsense arriving at a later date.	Noted	Conservation Areas will be designated during the Plan period. Work is ongoing, in parallel with the review of the island Plan, to develop proposals for St Helier. These proposals will be published and consulted upon separately, with any designation being adopted and issued through supplementary planning guidance.	The Minister notes the qualified support for this proposal
DP526		Mr Paul Harding	The Association of Jersey Architects	Proposal 7	Conservation Area Designation	Supporting	Proposals 1-14 & Policies BE1-BE3 - St Helier and other Regeneration / Local Development Zones We welcome and support the principal thrust of these sections, the proposals and Policies.		Noted	Noted	Support is noted by the Minister
DP676		Mrs Sue Lissenden		Proposal 7	Conservation Area Designation	Supporting	Conservation Areas are a good idea provided they can be adequately and sensitively policed.	At present government will find it hard to afford to employ the persons to do the latter, but that is no reason for scrapping the idea. Elsewhere volunteers are used, but a voluntary workforce and government make uneasy bedfellows.	Noted	Any breaches of planning control in Conservation Areas, once introduced, will be dealt with through the existing resources of the Planning and Environment Department.	Support is noted by the Minister
DP820		Mrs Susan Kerley		Proposal 7	Conservation Area Designation	Supporting	I endorse the suggestions and comments made by the National Trust for Jersey on these policies and proposals		Noted	Noted	Support is noted by the Minister
DP84		Mr Stephen de Gruchy		Proposal 7	Conservation Area Designation	Supporting			Noted	Noted	Support is noted by the Minister
DP963		Deputy Philip Rondel	Parish of St John Working Party	Proposal 7	Conservation Area Designation	Neither	St John has a significant number of important historical buildings, churches and Sights of Special Interest (SSI's) as well as other slightly less protected structures Buildings of Local Interest		Noted	Conservation Areas will be designated during the Plan period. Work is ongoing, in parallel with the review of the	The Minister notes the support for this proposal

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							(BLI's). There are a total of 176 such listed buildings within the Parish of St John and these fall into the following categories: 112 BLI's, 56 SSI's and 9 pSSI's. The Working Party supports recent initiatives to alter and reclassify these buildings. Certain areas of both 'Villages ' are of historical interest and they assist in contributing both character, appearance and an unspoilt atmosphere in the Parish. This approach must be maintained and enhanced.			island Plan, to develop proposals for St Helier. These proposals will be published and consulted upon separately, with any designation being adopted and issued through supplementary planning guidance. Work to assess the potential for designation of Conservation Areas in other parishes will be progressed later during the Plan period: proposals for their definition and designation may emerge in some of the northern parishes through the process of Village Plan preparation, under the auspices of Proposal 14, which is welcomed.	
DP296		Mrs Penelope Lee		Policy HE 3	Preservation or enhancement of Conservation Areas	Supporting			Noted	Noted	Support is noted by the Minister
DP845		Mr Rod Mcloughlin		Policy HE 3	Preservation or enhancement of Conservation Areas	Supporting	The designation of wider areas of interest which seeks to maintain the overall character and style of that area is to be welcomed . There is an opportunity to reinforce the significance of such areas by a combination of interpretation panels, maps and works of art which, in addition to providing information about the conservation area, can also themselves contribute a further aesthetic dimension to that area. Once again, the percentage for art policy could deliver the required funding and, in relation to the application of 'pooled funds ', could provide an especially appropriate use for those funds , particularly if the importance of public art to sense of place is reinforced in the Island Plan. (It might be noted that the historic residential areas of north St Helier are almost entirely devoid of public art of any description.)		Noted	The potential for sympathetic enhancement of Conservation Areas is noted and the proposed policy framework would enable this.	Support is noted by the Minister
DP85		Mr Stephen de Gruchy		Policy HE 3	Preservation or enhancement of Conservation Areas	Supporting			Noted	Noted	Support is noted by the Minister
DP297		Mrs Penelope Lee		Policy HE 4	Demolition in Conservation Areas	Supporting			Noted	Noted	Support is noted by the Minister
DP86		Mr Stephen		Policy HE 4	Demolition in	Supporting			Noted	Noted	Support is noted by the Minister

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		de Gruchy			Conservati on Areas						
DP298		Mrs Penelope Lee			Archaeolo gy	Supporting			Noted	Noted	Support is noted by the Minister
DP739		Paul Harding	The Associati on of Jersey Architec ts	Policy HE 5	Preservati on of Archaeolo gical Resources	Objecting	3 Where archaeological remains are of minor importance or consist of moveable artefacts we cannot understand why there should be a presumption in favour of their preservation in-situ because this makes them inaccessible to the general public. We submit it is far better such transportable archaeology is preserved in the Jersey Museum / Societe Jersiaise where they can be easily accessed and their value understood.		Reject	Excavation of archaeological evidence results in the total destruction of evidence (apart from the removable artefacts) from which future techniques could almost certainly extract more information than is currently possible. Excavation is also expensive and time-consuming, and discoveries may have to be evaluated in a hurry against an inadequate research framework. The preservation in-situ of archaeological remains is, therefore, nearly always to be preferred.	The Minister is not minded to amend the draft Plan
DP87		Mr Stephen de Gruchy		Policy HE 5	Preservati on of Archaeolo gical Resources	Supporting			Noted	Noted	Support is noted by the Minister
Built Environment											
DP742		Paul Harding	The Associati on of Jersey Architec ts	4	Built Environm ent	Supporting	Proposals 1-14 & Policies BE1-BE3 - St Helier and other Regeneration / Local Development Zones We welcome and support the principal thrust of these sections, the proposals and Policies.		Noted	Noted	Support is noted by the Minister
DP744		Paul Harding	The Associati on of Jersey Architec ts	4	Built Environm ent	Objecting	The AJA restates our comments in paras. 6.5 to 6.8 inclusive. We are extremely concerned the2009 Draft Plan does not make provision for the Island's built requirements.		Reject	It is considered that the draft Plan makes adequate provision for the Island's development needs over the next 10 years, and specifically makes provision for the Island's housing needs	The Minister is not minded to amend the draft Plan as the issues raised are already adequately addressed
DP299		Mrs Penelope Lee			BE: Introducti on	Supporting			Noted	Noted	Support is noted by the Minister
DP519		Mr Paul Harding	The Associati on of Jersey Architec ts		BE: Introducti on	Neither	Although the 2009 Draft Plan stipulates minimum densities will have to be achieved within the Built-Up Area there is no indication of what standards will be required. Without any guidance we therefore cannot understand how the forecast for housing yield has been calculated.	Intensifying density in the Built-Up Area will necessitate further guidance about what does not constitute over-looking, or over-bearing development and standards for rights of light, without which the implementation of the Plan's principal thrust will be thrown into doubt.	Noted	Proposal 10, Policy GD3 and the supporting justification, at 1.17, together with Appendix A, all seek to indicate the Minister's intent to develop and publish guidance about the adoption and application of minimum density standards.	The Minister is not minded to amend the draft Plan as this issue is already adequately addressed.



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DP561		Deputy John Le Fondre			BE: Introduction	Supporting	Built Environment - higher and more land-efficient densities - I fully support the application of higher densities in urban sites. Using St Helier as a prime example (but not the only place where higher building could be permitted), it would seem to me that as St Helier sits in a valley, it is well placed to bear taller buildings. This with the caveat of good design, better internal spatial standards, appropriate (and realistic) parking standards and good amenity space. If this can be achieved then living in St Helier will be an attractive proposition, and that can only be good for this Island.		Noted	Support for an increase in density on urban sites noted. Policies GD3 and BE5 seek to deal with the development and application of minimum density standards and proposals for the development of tall buildings respectively	Support is noted by the Minister
DP919		mr daniel wimberley			BE: Introduction	Objecting		THE URBAN AREAS Many fine words!! e.g. 4.4 focussing development - no mention of quality of life. Plus 4.8. Disappointing and underperforming . . . We develop every last site in town for housing, the Sunshine Hotel, the old Tantivy site at Georgetown, trees, somewhere to sit out in the sunshine, somewhere for the children to play? You've got to be joking? Why does it matter to a country deputy? Because I cannot in conscience vote for packing more people into St. Helier at higher densities, however well-designed those densities are, unless there is an absolute commitment to spending the necessary care, effort and money to ensure that living in town is every bit as desirable, albeit in a different way, as living in the country. That is the only morally and politically acceptable ways forward. The MTP is essential in this regard. (So is Fort Regent . . . ) Not an option. I notice it is seen 4.14 as a development site in one paragraph. REC that this reference be removed.	Reject	The draft Plan makes it clear that the urban focus of the Spatial Strategy must be balanced with the need to ensure that the existing and future residents of the Island's Built-up Area have access to a high quality environment which includes an appropriate level of amenities and facilities. This is clearly set out in the Plan and is explicitly referenced in the Objectives for the Built Environment at BE1, as well as throughout the supporting justification and the whole of this section of the Plan. Reference to the Town Park site is misconstrued - it is a development opportunity in the sense that it is proposed to developed as park which, of itself, has the potential to serve as a catalyst for regeneration in this part of the town.	The Minister is not minded to amend the draft Plan as the issues raised are already addressed
DP929		mr daniel wimberley			BE: Introduction	Neither	4.2 RED Houses is an urban area!		Noted	Red Houses is already identified as an urban area: it is defined as a secondary urban settlement in the hierarchy of settlement types in Jersey, as shown on Map 2.2.	Noted by the Minister
DP993		Captain Howard Le Cornu	States of Jersey Harbours		BE: Introduction	Objecting	section 4.5: Amend words 'St Heller's harbours' to 'Jersey Harbours	Reference to the Trading Operation and consistency with Jersey Airport	Reject	It is not a reference to a Trading Operation but a reference to the spatial entity of the harbours in St Helier.	The Minister is not minded to amend the draft Plan
DP300		Mrs Penelope Lee			BE: Objectives and Indicators	Supporting			Noted	Noted	Support is noted by the Minister
DP994		Captain Howard Le Cornu	States of Jersey Harbours		BE: Objectives and Indicators	Objecting	Section 4.14: Amend words 'St Helier's harbours' to 'Jersey Harbours ; Make reference to the Port Operational Area	Reference to the Trading Operation and consistency with Jersey Airport	Reject	Reference here is to the spatial entity of the harbours of St Helier and not the portfolio of the States of Jersey Harbours trading	The Minister is not minded to amend the draft Plan

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										operation. The spatial extent of these areas will be defined through Proposal 11.	
DP1037		Ray Shead	The Jersey Chamber of Commerce	Objective BE 1	Built Environment Objectives	Objecting	The redevelopment and regeneration of the town needs to cover all parts of the town and not just fragmented parts. The theme of creating a sustainable living environment must be at the heart of any scheme. The Built Environment must connect with both domestic and global imperatives in terms of the environment and emissions together with demands on natural resources and the generation of waste. The quality of buildings and their energy and environmental impact must start forming part of the States strategic thinking and direction. Proposal 9 - it is important to engage fully with all key stakeholders to ensure that the community fully accepts the strategic aims and objectives thus helping to keep each area special to those who presently and in the future live or work in and visit the town. Environment and Sustainability should form part of the policy objective statement.		Noted	Objective BE1 relates to the whole of the built environment and not just parts of St Helier. Objective BE1 is clear and explicit about creating a sustainable built environment as a place to live, work and visit. Environment and Sustainability are integral to the Strategic Policies of the draft Plan out of which these specific objectives (such as BE1) emerge.	The Minister is not minded to amend the draft Plan as these issues are adequately addressed.
DP301		Mrs Penelope Lee		Objective BE 1	Built Environment Objectives	Supporting	Much of St Helier has been allowed to become a squalid slum.	Some of the potentially attractive old houses should be restored into family homes from their current neglected state of bedsits. Housing should introduce a licensing system to ensure these properties are upgraded.	Noted	Noted	Support is noted by the Minister
DP88		Mr Stephen de Gruchy		Objective BE 1	Built Environment Objectives	Supporting			Noted	Noted	Support is noted by the Minister
DP1172		Mrs. Celia Scott Warren		Objective BE 2	Regeneration of St. Helier Objectives	Supporting	believe there is merit in making interconnecting vibrant neighbourhoods within St. Helier districts, to enhance the sense of community.	I accept that most new homes should be built in the St. Helier area, with some additional village housing in northern parishes where it is supported by parishioners. I feel that creating interconnecting vibrant neighbourhoods in St. Helier would improve town-living for residents, for the reason stated above.	Noted	Noted	The Minister notes the qualified support for these objectives
DP302		Mrs Penelope Lee		Objective BE 2	Regeneration of St. Helier Objectives	Supporting			Noted	Noted	Support is noted by the Minister
DP465		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	The Minister is minded to amend the draft Plan to delete the word 'features' from Objective BE2

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										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.	
DP466		Mr Charles Alluto	The National Trust for Jersey	Objective BE 2	Regeneration of St. Helier Objectives	Objecting	The Trust is uncertain as to the reasoning behind the stated objective of a space for a special building which celebrates 21 st Century Jersey. Indeed it is to be hoped that the Waterfront as a whole will finally be designed and constructed in a cohesive manner, which fully reflects and celebrates the aspirations and needs of Jersey's community. Unfortunately to date the Waterfront has suffered piecemeal development due to a lack of strategic vision, investment, transparency and public engagement/ accountability.	It is crucial that these issues are addressed as part of the planning objectives for the area, so that a real sense of community ownership/benefit is re-established and a balance achieved between private and public sector led development.	Reject	The St Helier Waterfront provides an opportunity for the development of architecture and new buildings which can contribute towards the current and future identity of the Island, expressed through its built form. This need not be achieved at the expense of, or without reference and integration with its context.	The Minister is not minded to amend the draft Plan
DP493		Mr Paul Harding	The Association of Jersey Architects	Objective BE 2	Regeneration of St. Helier Objectives	Objecting	We are disappointed the 2009 Draft Plan continues the prescriptive Planning approach, focussing on what we cannot do with our Built and Natural Environment. It is very negative in setting out what we cannot do and there is little about what we can achieve. What is the vision for the Coastal National Park ? Where is the vision for St Helier, which is no longer seen as a town but a regional Capital. Maximising density and scale of St Helier to provide all our built needs will result in significantly changing its scale and character.		Reject	The Vision for St Helier is set out within the objectives for the regeneration of the Town at BE2. Further detail will follow in relation to the development of master plans for specific areas of the town, as set out at Proposal 11, and be complemented by other proposals, such as that for the Public Realm Strategy, which affect the whole of the town. It is the nature of planning policy frameworks, given the role that they play in providing a basis upon which to make planning decisions, that they are regulatory in nature. The development of area-based master plans and development briefs for key sites will provide more positive guidance relative to the development opportunities and potential for different parts of the town, as evidenced by the North of Town Masterplan.	The Minister is not minded to amend the draft Plan
DP821		Mrs Susan Kerley		Objective BE 2	Regeneration of St. Helier Objectives	Objecting	I endorse the suggestions and comments made by the National Trust for Jersey on these policies and proposals		Noted	Noted	The Minister notes the objection in relation to this objective which relates to that made by NTfJ
DP846		Mr Rod McLaughlin		Objective BE 2	Regeneration of St. Helier	Neither	In relation to the redevelopment of Fort Regent, there are a number of important cultural imperatives: o Ensure that the redevelopment is		Noted	Noted	Noted by the Minister

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					Objectives		undertaken consistent with the Gibb conservation statement. o Ensure that any redevelopment recognises that the Fort currently provides the only performance space capable of accommodating orchestral concerts and popular events requiring a seating capacity in excess of the 625 provided by the Jersey Opera House. o Take advantage of the opportunity to improve interpretation of the historic site and access to areas affording views of the surrounding areas. o Take account of the potential (identified in the Public Art Strategy) for public art. Another key site identified for public art which appears on list of St Helier sites for regeneration is the Town Park.				
DP89		Mr Stephen de Gruchy		Objective BE 2	Regeneration of St. Helier Objectives	Supporting	Support with caveat I would like to see BE2 include an emphasis on supplying family-sized accommodation in the regenerated St Helier, i.e. 3 bedroom apartments. As offices are moved towards the Waterfront, I think developers should be encouraged to convert that previous office space into light and airy family-sized apartments.		Noted	The objective clearly states the desire to create attractive residential areas and implicit within this is the assumption that to be attractive they must cater for the Island's housing needs. The delivery of this objective is covered in more specific detail by Policy HE4:Housing mix, which seeks to provide the Minister with an ability to influence the type of residential accommodation provided by making this issue a material consideration in the determination of planning applications. The addition of a specific accommodation type into a series of objectives also may become dated as supply and demand changes over the Plan period.	The Minister is not minded to amend the draft Plan as the issues raised are already adequately dealt with
DP261		Mr Mike Waddington			Regenerating St Helier	Objecting	No Vision for St Helier Having decided that new residential developments must be concentrated in St Helier, the Draft Island Plan does little to inspire us, eg: a. what is the Vision for St Helier's future? But where are the masterplans to describe this? C. those masterplans that have been prepared are either stalled or not joined-up with each other- why not, and when will this be resolved? d. We seem not to be learning from the studies already commissioned or the buildings completed- do they work? If so how well? Can we do better? E. where is the Town model? F. why doesn't it promote the idea of attractive urban living? My Vision for "Polycentric St Helier" St Helier must become a sustainable and polycentric, compact city. "Polycentric St Helier" simply means: a. it is divided into distinct neighbourhoods b. each would be 5		Reject	The vision for St Helier is set out in 4.17 and has been informed by a number of strategic pieces of work leading up to the publication of the Draft Plan, including Willie Miller's St Helier Urban Character Appraisal; the St Helier Development and Regeneration Strategy (EDAW); and a number of pieces of work related to the development of the St Helier Waterfront (Hopkins and Shepley). It is acknowledged that further work is required to provide specific, more detailed, policies and proposals underneath this overarching	The Minister notes the conceptual approach proposed but is not minded to amend the draft Plan

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							minutes walk (1/4 mile) in size in any direction (pedshed) c. each would have a name and a unique sense of place. d. each would have a park, public square or civic space e. each would be connected by pedestrian and cycle links f. each would have a good mix of uses, shops, offices, affordable and open market homes etc. g. car share schemes, free parking for electric vehicles, residents parking and so on would be provided h. free bicycle share schemes would be provided- like Velib in Paris i. new homes would be spacious, and volumetric j. good design would add value k. the best of our architectural heritage would be celebrated l. local business as well as the States would sponsor the neighbourhoods m. people would identify with their neighbourhoods and take ownership of them n. in this way we could, once again, rediscover our collective pride in St Helier			vision for the town and this will be achieved by a number of work streams identified in the draft Plan as set out at Proposal 8; St Helier Conservation Areas; Proposals 9: Public realm Strategy; and, perhaps most significantly; Proposals 11: St Helier Regeneration Zones. All of this work will seek to build on, and enhance the local identity and character of these areas, seeking to enhance the quality of the local infrastructure, facilities and amenities of these specific areas, reflecting the conceptual view set out in the representation made. Such work will also need to be complemented, in particular, by the Sustainable Transport Policy, to address issues of accessibility, movement and traffic management.	
DP303		Mrs Penelope Lee			Regenerating St Helier	Supporting	St Helier needs a great deal of work to improve a neglected environment.		Noted	The draft Plan acknowledges that there needs to be considerable attention, effort and resources directed to St Helier in particular to realise its regeneration and potential, as set out in the draft Plan	Noted by the Minister
DP922		Mr Daniel Wimberley			Regenerating St Helier	Objecting	REC a real commitment to the resources, care and effort needed for the regeneration of the town area needs to be in the Plan.		Noted	The specific attention given to the urban focus of the Spatial Strategy and the implications of this for St Helier in particular is considered to be explicit in the draft Plan.	The Minister notes and endorses the comments made but is not minded to amend the draft Plan as these are already addressed
DP467		Mr Charles Alluto	The National Trust for Jersey		Protecting and Enhancing the Town Environment	Supporting	The Trust fully endorses and very much welcomes the acknowledgement of the economical and cultural value of St Helier's historic environment and hopes that the designation of St Helier's conservation areas will be seen as a key priority.		Noted	Noted	The Minister notes the qualified support for this part of the draft Plan
DP932		Mr James Godfrey	Royal Jersey Agricultural & Horticultural Society		Protecting and Enhancing the Town Environment	Neither	Built environment: It is important to devote resources to ensuring that the urban areas in particular are improved through regeneration whilst at the same time protecting streetscapes and facades of interest in order that St Helier does not develop into a copy of any regional UK town.		Noted	The townscape interest of St Helier will be assessed and appropriately protected as part of the work to define and designate conservation areas, as set out at Proposal 7 and 8.	The Minister notes the comments made but is not minded to amend the draft Plan as the issues raised are already



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											adequately addressed
DP1005		Mr John Mesch	Council for the Protection of Jersey's Heritage	Proposal 8	St Helier Conservation Areas	Supporting	7. We strongly support the proposal to designate Conservation Areas, especially in St. Helier (Proposal 8) and wish to see it expressed as firm Policy. This would enable conservation areas to be designated as and when required, without the need to update the plan again.		Noted	Proposals 7 and 8 clearly set out the Minister's intent to designate Conservation Areas during the Plan period, starting with St Helier, as indicated by Proposal 8.	Support is noted by the Minister
DP304		Mrs Penelope Lee		Proposal 8	St Helier Conservation Areas	Supporting			Noted	Noted	Support is noted by the Minister
DP516		Mr Paul Harding	The Association of Jersey Architects	Proposal 8	St Helier Conservation Areas	Supporting	We welcome the Policies to introduce Conservation Areas, providing Proposal 7 is rewritten to make it clear they will be specific area with single identifiable unique character. Also include same comment for Proposal 8, St Helier Conservation Areas. We have heard suggestions the whole of St Helier may be designated a Conservation Area, within which there will be areas of 'indeterminate' and 'poor' conservation character. Please can we have these sections re-written to avoid risk of such absolute nonsense arriving at a later date.		Noted	Conservation Areas will be designated during the Plan period. Work is ongoing, in parallel with the review of the island Plan, to develop proposals for St Helier. These proposals will be published and consulted upon separately, with any designation being adopted and issued through supplementary planning guidance.	The Minister notes the qualified support for this proposal
DP90		Mr Stephen de Gruchy		Proposal 8	St Helier Conservation Areas	Supporting			Noted	Noted	Support is noted by the Minister
DP921		mr daniel wimberley			Improving the Public Realm	Objecting	Streets form 80% of open space in the urban areas. Can we have a policy about these spaces? Or a much clearer commitment to making this important area of land work for all the community, bearing in mind especially the needs of children?		Noted	The draft Plan explicitly acknowledges that streets are an important and integral element of the public realm (see para 4.33). It is considered that the commitment is clearly shown to ensure that the quality of the public realm in St Helier is protected and enhanced.	The Minister is not minded to amend the draft Plan as the issues raised are already adequately addressed
DP305		Mrs Penelope Lee		Proposal 9	Public Realm Strategy	Supporting			Noted	Noted	Support is noted by the Minister
DP403	Mrs Stephanie Steedman	Mrs Stephanie Steedman		Proposal 9	Public Realm Strategy	Supporting	The public realm strategy for St Helier needs to include an holistic approach and think creatively. Connections and routes are important, as is making the most of every ounce of public open space. There are some under utilised spaces in the town, which do not fall easily into the definition of open space, but could be important parts of any strategy. The Town Market is an under utilised resource and is suffering from changes in consumer behaviour. Could leisure activities be developed in the Market alongside existing uses? It is a publicly administered space; could it provide more facilities for town residents? The Odeon currently provides a large space. Could this be used for a leisure related activity? Any strategy should give consideration to	The strategy proposes to increase the population of the town - the strategy needs to provide people with spaces for leisure related activities.	Noted	Noted	Support is noted by the Minister

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							areas on the edges of the town for leisure related purposes, for example, allotments. These locations would be within walking distance of the town.				
DP468		Mr Charles Alluto	The National Trust for Jersey	Proposal 9	Public Realm Strategy	Supporting	The Trust welcomes the public realm strategy and would simply add that the town's public spaces would benefit from a cohesive design policy/guidelines in relation to public street furniture, lighting, and use of materials as per Policy BE9.		Noted	There is potential for policy/guidelines in relation to public street furniture, lighting, and use of materials to be an integral element of or to subsequently be developed as a element of the proposed public realm strategy	Support is noted by the Minister
DP528		Mr Paul Harding	The Association of Jersey Architects	Proposal 9	Public Realm Strategy	Supporting	Proposals 1-14 & Policies BE1-BE3 - St Helier and other Regeneration / Local Development Zones We welcome and support the principal thrust of these sections, the proposals and Policies.		Noted	Noted	Support is noted by the Minister
DP822		Mrs Susan Kerley		Proposal 9	Public Realm Strategy	Supporting	I endorse the suggestions and comments made by the National Trust for Jersey on these policies and proposals		Noted	Noted	Support is noted by the Minister
DP848		Mr Rod McLaughlin		Proposal 9	Public Realm Strategy	Supporting	The commissioning of public realm and open space strategies is welcomed from the cultural perspective; both should link effectively with the Public Art Strategy commissioned by ESC's Public Art Advisory Group in 2009 . The opportunity to engage with stakeholder organisations like the Public Art Advisory Group, the Jersey Arts Trust and the Jersey Heritage Trust in the production of such strategies is encouraged. In particular, the Public Realm Strategy could profitably address inter-agency collaborative working to address small-scale aesthetic aspects of the public realm and its management, a responsibility which appears to fall between agencies at present.		Noted	Any public realm strategy would seek to ensure consistency and complementarity to the Public Art Strategy commissioned by ESC's Public Art Advisory Group in 2009. It would also seek to address the issues of the management and maintenance of the public realm through engagement with those key agencies and stakeholders involved in this important, but often overlooked, aspect.	Support is noted by the Minister
DP91		Mr Stephen de Gruchy		Proposal 9	Public Realm Strategy	Supporting			Noted	Noted	Support is noted by the Minister
DP562		Deputy John Le Fondre			Town Centre Vitality	Supporting	Core Retail Area - the Town proposals map identifies the core retail area in pink. As noted before I strongly believe that we need to support the key retail centre of St Helier, particularly the Central (and fish) markets and surrounding areas. I have already expressed my concerns over the level of retail offering being generated on the Esplanade Quarter (and potentially elsewhere on the Waterfront), however I note that the Esplanade Quarter (etc) is not shaded in pink to encompass the core retail area, and I again express my concern over the level of retail offering on that specific site, particularly when it is not to be regarded as a core part of the retail offering of St Helier. By foot it is not far from King Street / Broad Street, and I think		Noted	Policy SP3 will seek to ensure that major new retail development is firstly directed to the Core Retail Area of the town, and Policy BE1 seeks to ensure that the vitality of the core retail area, as defined on the proposals map, is protected. Policy BE2; existing consents (for Liberty Wharf) and ER2-ER8 facility the provision of other retail uses within St Helier Town Centre and the Built-up Area, in accord with the sequential test and where they are appropriate in scale.	The Minister notes the qualified support for this section of the draft Plan

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							every effort should be made to encourage workers on that site to shop on the high street rather than at some new store immediately underneath them. Yes, a limited number of facilities will be required on site, but not to the level presently envisaged particularly in these present economic times.				
DP306		Mrs Penelope Lee		Policy BE 1	Town Centre Vitality	Supporting			Noted	Noted	Support is noted by the Minister
DP405	Mrs Stephanie Steedman	Mrs Stephanie Steedman		Policy BE 1	Town Centre Vitality	Neither	The dynamics of the town are changing as a result of the development of the Waterfront and the relocation of offices to the Esplanade area. In conjunction with this retailers are under facing increased competition from internet retailers and the accessibility of off-island goods. There has also been a decrease in the number of visitors to support local retailers. Combined with this, out of town retailers have capitalised on the preference for shoppers to park close to retail outlets. St Helier needs to address all of these issues and more if it wants to remain competitive. The land use strategy provides the decision making framework about land uses to support the vitality of St Helier; however, the issues affecting the town need to be addressed holistically. Should the States be investing in technology to promote the town? For example a town/ retailers web-site telling people what's on, what's in stock, what does it cost etc?? Revitalising the Market. Supporting and promoting tourism.....are just a few suggestions.	Without visitors, the catchment area for St Helier is finite. If you want to keep St Helier vital, user numbers need to be increased. Planning policies are just one part of the strategy for achieving this.	Noted	Noted	The Minister notes the comments made in relation to this issue
DP536		Mr Paul Harding	The Association of Jersey Architects	Policy BE 1	Town Centre Vitality	Supporting	Proposals 1-14 & Policies BE1-BE3 - St Helier and other Regeneration / Local Development Zones We welcome and support the principal thrust of these sections, the proposals and Policies.		Noted	Noted	Support is noted by the Minister
DP688		Mr Andrew Fleet	Style Group Ltd	Policy BE 1	Town Centre Vitality	Objecting	Policy BE1 supported by Objective BE1 contradicts Policy EI , where the former encourages new development on previously developed sites, which in the main are likely to the former employment sites and then Policy EI seeks to protect all employment sites.		Reject	There is not considered to be any contradiction: the combination of the application of Policy E1 and BE1 should seek to ensure that development in the Town Centre is related firstly, to employment activity; and , secondly, to retail use.	The Minister is not minded to amend the draft Plan
DP847		Mr Rod Mcloughlin		Policy BE 1	Town Centre Vitality	Neither	Paragraph 4.22 draws attention to the importance of a vibrant town. One aspect of such vibrancy concerns the impact of the creative industries and, in particular, artists whose skills can act as a magnet for visitors. The Cultural Strategy identifies the importance of providing studio space for artists. This can be provided on a temporary basis in circumstances where properties awaiting redevelopment fall vacant prior to the start of the		Noted	It is considered that Policy ER5 would enable the use of premises by artists within the defined Town Centre, whether for permanent or temporary use.	The Minister is not minded to amend the draft Plan as the issue is already addressed

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							redevelopment or where they fall vacant. The economic conditions noted at pp. 182-3 may result, for instance, in some office accommodation providing suitable space. There may be an opportunity for the Planning Department to encourage use of temporary space for artists during such periods and consideration might be given to incorporating this into Policy BE1.				
DP92		Mr Stephen de Gruchy		Policy BE 1	Town Centre Vitality	Supporting			Noted	Noted	Support is noted by the Minister
DP1039		Ray Shead	The Jersey Chamber of Commerce	Policy BE 2	Delivery of the St Helier Waterfront	Supporting	The policy is agreed but with reservations. The longer the delay in commencing the works, the more the supplementary planning guidance (April 2006) and the Masterplan (April 2008) will become outdated. The change in finance availability and markets means that large capital sums to fund the "up front" costs are not available and finding a Developer for the site will be difficult, if not impossible for a considerable period. By the time a Developer is found the requirements for the buildings may well have changed and indeed so may the need for large car parks. The draft plan should recognise that a further review will be required before commencing the project.		Qualified support noted	Whilst changed economic circumstances are recognised, Jersey's economic performance remains heavily dependent upon the financial services sector and, as a consequence, the draft Plan seeks to respond to the requirements for new office accommodation: the St Helier Waterfront remains critical in this respect and the planning framework set out by Policy BE2 facilitates this provision. Policy BE2 does not preclude the revision of the planning framework in the future, as the need arises. This can be dealt with as supplementary planning guidance, and adopted and published by the Minister for Planning and Environment.	The Minister is not minded to amend the draft Plan.
DP307		Mrs Penelope Lee		Policy BE 2	Delivery of the St Helier Waterfront	Objecting	The Esplanade Quarter will be a financial disaster for the Island.	Given the world economic situation this development should be shelved.	Reject	The Esplanade Quarter development is required to provide new office accommodation: ensuring the provision of sufficient modern office space to meet the requirements of the financial services industry is a key aim of the Plan.	The Minister is not minded to amend the draft Plan
DP538		Mr Paul Harding	The Association of Jersey Architects	Policy BE 2	Delivery of the St Helier Waterfront	Supporting	Proposals 1-14 & Policies BE1-BE3 - St Helier and other Regeneration / Local Development Zones We welcome and support the principal thrust of these sections, the proposals and Policies.		Noted	Noted	Support is noted by the Minister
DP679		Mrs Sue Lissenden		Policy BE 2	Delivery of the St Helier Waterfront	Objecting	The Waterfront development began badly and has gone on in a disastrous way. It remains a disgrace, in spite of all strategies, policies, guideline, and objectives. Get a grip!		Noted	The planning framework set out in the draft Plan seeks to provide for a higher quality and integrated implementation of future development on the St	The Minister is not minded to amend the draft Plan

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										Helier Waterfront	
DP920		mr daniel wimberley		Policy BE 2	Delivery of the St Helier Waterfront	Objecting	Open Space: There should be a commitment to a standard in the Plan, not left until later. And it should be a criterion in BE2		Noted	The planning framework for the St Helier Waterfront provides for the creation of a high quality public realm with the creation of a number of public squares and other public spaces.	The Minister is not minded to amend the draft Plan
DP93		Mr Stephen de Gruchy		Policy BE 2	Delivery of the St Helier Waterfront	Supporting			Noted	Noted	Support is noted by the Minister
DP308		Mrs Penelope Lee			Managing Change	Supporting			Noted	Noted	Support is noted by the Minister
DP563		Deputy John Le Fondre			Managing Change	Supporting	Ref para 4:58 SoJDC - I believe I have a reasonable understanding of the proposals in relation to SoJDC - effectively it is segregation of duties between designing a package for development (to be the role of the Regeneration Steering Group - effectively the Public etc), and implementation / delivery of that package, with the latter role to be performed by the revamped WEB (ie SoJDC). Therefore I believe these principles (subject to the detail) should be fully endorsed.		Noted	Noted	Support is noted by the Minister
DP564		Deputy John Le Fondre			Residential Regeneration	Supporting	Yield from Town - if height could be increased for residential development (subject to good design, internal spatial standards, good amenity space), I believe that yields could be encouraged upwards, and I think this particular nettle needs to be grasped.		Noted	The need to increase the density of development, and to make the most efficient and effective use of land, is a strategic principle of the draft Plan, as set out at SP2, and supported by GD3. The policy context for dealing with proposals for tall buildings is set out at BE5.	Noted by the Minister
DP565		Deputy John Le Fondre			Residential Regeneration	Supporting	Ref para 4:67 Amenity Space - agreed Ref para 4:69 Internal Spatial Standards - agreed - I would potentially suggest that a further 10% increase (subject to evaluation of the financial impact) should be considered. Some developers always build to a minimum, therefore that minimum should be constantly reviewed. If apartment style living is to be encouraged, internal space and good design is critical.		Noted	Noted	The Minister notes the support for these parts of the draft Plan
DP309		Mrs Penelope Lee		Table 4.1		Supporting			Noted	Noted	Support is noted by the Minister
DP310		Mrs Penelope Lee		Proposal 10	Guidelines for Residential Regeneration	Supporting			Noted	Noted	Support is noted by the Minister
DP529		Mr Paul	The	Proposal	Guidelines	Supporting	Proposals 1-14 & Policies BE1-BE3 - St Helier and		Noted	Noted	Support is noted



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		Harding	Associati on of Jersey Architec ts	10	for Residentia l Regenerat ion		other Regeneration / Local Development Zones We welcome and support the principal thrust of these sections, the proposals and Policies.				by the Minister
DP718		Mr Kenneth Renouar d		Proposal 10	Guidelines for Residentia l Regenerat ion	Neither	Higher density development in town may in turn lead to greater social problems, an issue that has already been highlighted in Jersey. Redevelopment in St Helier should include an emphasis on communal space and open areas. These areas could be for the enjoyment and use of residents, commuters and visitors alike. The quality of the environment we live will influence whether we experience more or less social problems in the future.		Noted	It is acknowledged that there is a requirement to ensure the new guidance seeks to ensure the provision of minimum standards that provide for a good quality living environment for town residents. It is also acknowledged elsewhere in the draft Plan, at SCO4, SCO5, SCO6 and Proposal 9 and 17, that there is a need to ensure that community facilities and infrastructure, particularly open space, is protected and enhanced.	Noted by the Minister
DP741		Paul Harding	The Associati on of Jersey Architec ts	Proposal 10	Guidelines for Residentia l Regenerat ion	Objecting	9.1 Although the 2009 Draft Plan stipulates minimum densities will have to be achieved within the Built-Up Area there is no indication of what standards will be required. Without any guidance we therefore cannot understand how the forecast for housing yield has been calculated. Intensifying density in the Built-Up Area will necessitate further guidance about what does not constitute over?looking, or over?bearing development and standards for rights of light, without which the implementation of the Plan's principal thrust will be thrown into doubt.		Noted	Estimated yields for the capacity of the Town of St Helier to accommodate new residential development are set out in table 4.1. The methodology underpinning this work will be set out in a report on this particular aspect of the Plan. Proposal 1 and Policy GD3 identify and acknowledge the need and intent to publish supplementary planning guidance related to density standards.	The Minister is not minded to amend the draft Plan as the issues identified are addressed
DP873		Mr Stephen D Smith	Health Protecti on Services	Proposal 10	Guidelines for Residentia l Regenerat ion	Neither	Housing densities are an emotive issue and care is needed to ensure suitable and sufficient properties of the correct mix of accommodation are provided for those living in Jersey particularly as there is a proposal for majority development in town areas. Proposed high-density developments have been unpopular with local residents in other jurisdictions because of the problems they can cause i.e. noise and anti social behaviour, lack of green space and unsuitability for families, high maintenance and repair costs. Innovative architecture and design is needed that offers a sense of space and light within the homes whilst minimising high rise schemes. In all new developments there needs to be provision of suitable communal green space.		Noted	The Proposal explicitly acknowledges that care is needed to ensure that, by increasing the density of development, social issues do not arise as a consequence of the standard and design of the properties provided. Accordingly, it is acknowledged that the Minister will prepare and issue supplementary planning guidance setting out minimum standards for internal and external space, including amenity space. Other parts of the Plan seek to protect and promote communal open space provision and enhancement.	Noted by the Minister
DP883		Mr Andrew Heaven	Health Improve ment	Proposal 10	Guidelines for Residentia	Neither	In order to ensure health improvement is actively included within the planning process, supplementary planning guidance for health		Noted	The department is happy to engage with the Public Health Department in the development	The Minister notes the comments made

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			(Public Health Department)		Regeneration		improvement should be developed with the Public Health Department to support the following areas: Ensure planning requirements for the development of housing is consistent with existing health policy (to promote exercise and mental health) and the practice of trading off public and private amenity space does not result in an environment that discourages exercise or demotes mental health. We need good quality housing that is spacious enough for multiple occupancy, provision of safe play areas for children and provide secure bike parking facilities for adults and children.			of supplementary planning guidance	and will act on them accordingly
DP933		Mr James Godfrey	Royal Jersey Agricultural & Horticultural Society	Proposal 10	Guidelines for Residential Regeneration	Supporting	Development density: There has to be a more imaginative approach to housing stock, for example consideration should also be given to encouraging multi generational living by ensuring that new build houses have a capacity for 'dower' type extensions to be added, or are retained within those properties that have them This would serve to assist with the care of the elderly, provide 'down sizing options', provide young working families with greater family support and increase efficiency of capital in the housing stock.		Noted	This may be consistent with the proposal to increase the density of development and could be considered relative to Policy GD3. This issue is dealt with, where it relates to extensions to existing residential accommodation in the Green Zone, at NE7(e).	The Minister notes the qualified support for this policy
DP94		Mr Stephen de Gruchy		Proposal 10	Guidelines for Residential Regeneration	Supporting			Noted	Noted	Support is noted by the Minister
DP634		Richard Plaster	Jersey Electricity plc		Regeneration Zones	Supporting		We note proposals to relocate the fuel farm and gas farm from its current location. We would support any movement of these hazardous installations away from our La Collette Power Station and the associated distribution infrastructure, because we continue to be concerned that an incident at either of the fuel farm or gas farm could have serious consequences on the services we provide, ongoing electricity supply and the safety and security our staff.	Noted	Noted	The Minister notes the support for the proposals outlined for La Collette and the Port
DP985		Captain Howard Le Cornu	States of Jersey Harbours		Regeneration Zones	Objecting	Section 4.72: Make reference to Port Operational Area and the need to protect the working of the port during any development. Possibly combine the two Regeneration Zones into one 'Jersey Harbours Regeneration Zone' which could be sub-divided into the two current proposed regeneration Zones'. Similar to Proposal 12: Jersey Airport Regeneration Zone. Section 4.75 : Reference to the Trading Operation and existing agreed Port Masterplan. Significant factual inaccuracies within current wording.	The Minister for Economic Development and Harbour Master must be consulted before any 'area-based Masterplans, development briefs, design frameworks or design codes' are adopted for the two Regeneration Zones within the Port Operational Area i in order to confirm that the port is not adversely impacted by development. This is in line with the requirements of the Planning and Building (Jersey) Law 2002. The two zones impact both the commercial port and existing marinas, other areas of the port are not included within either Zone, and a co-ordinated approach is required for the whole area. Consultation with the Jersey Port Users	Reject	There are a number of key issues emerging from this representation: The need for consultation with stakeholders: Proposal 11 makes it explicitly clear that any guidance will be developed in consultation with key stakeholders; Co-ordinated approach for St Helier harbours: the Old Harbours and La Collette and the Port are shown as separate zones, because they are different in character and function. It is, however,	The Minister is not minded to amend the draft Plan

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								<p>Association, Jersey Marine Traders Federation, St Helier Boat Owners Association and other stakeholder groups must be included in any regeneration plans. The two Regeneration Zones which overlap with the Port Operational Area should be developed in very close consultation with Jersey Harbours to ensure the port regeneration is not impacted by their development, I believe that the Island Plan should represent Jersey Harbours in a similar way to Jersey Airport, with more clarity and focus around the primacy of a Port Operational Area. Currently there is notable policy inconsistency between the two Trading operations, and it would seem logical to take a similar approach to both 'ports'. Whilst designated as a regeneration zone, until an alternative Port operational area is designated, fit for purpose and operational (for e.g. LoLo Operations at to move to La Collette), it is important that the existing Port Operational area is able to change and adapt and be available for direct and indirect operational functions. Planning permissions must be given against those, and not Regeneration Zone requirements. There should be a separate Proposal (e.g. 12B) for Jersey Harbours Regeneration Zone, with clarity with regard to 'Permitted Developments' within a well defined Port Operational Area (existing TT35). There is also notable policy inconsistency between Jersey Harbours and Jersey Airport, another Trading Operation. It would seem logical to take a similar approach to both 'ports'. Overall, the Draft Plan is confusing with regard to the operational port of St Helier and Jersey Harbours. It would be clearer if a section could be defined containing all port planning guidelines. The Port of St Helier is the Island's lifeline link with 99% of the Island's freight passing through an already constrained area. The need for a safe and secure commercial port is unquestioned. This requires unimpeded access with water deep enough for the largest vessels expected to use the port, which may require dredging, and comes with the risk of noise, dirt and danger associated with loading and unloading cargo. For an Island economy, there are limited alternatives to the use of sea transport for the movement of freight. Air freight is used for limited high value and express deliveries only. As a consequence, shipping will continue to provide the only effective way to move the vast majority of freight into and out of the Island. The provision of sufficient port capacity will remain an essential element in ensuring sustainable economic growth.</p>		<p>acknowledged that there is a degree of inter-dependence between them. Clearly, the development of master plans for both, on the basis that it involved consultation with stakeholders, would identify the relevant issues of inter-dependence. Spatial representation of harbour regeneration zones: there is no planning justification to separate out the harbour regeneration zones and to treat them separately. The harbours at St Helier are physically contiguous with St Helier and it is appropriate to show them as such. Jersey Airport has no such spatial relationship with St Helier and, as such, is shown separately. Port Operational Area: the policy regime applicable to the use of the Port is set out at TT15. The definition of the Port Operational Area will be addressed, by amendment of the draft Plan, as acknowledged in response by the Minister to comments made on TT15. Marine leisure use: This is made reference to at Policy NE5 where there is a presumption against the provision of any new marina facilities. The development of additional facilities to serve marine leisure users at established sites, such as the Old Harbours, should be dealt with through the development of supplementary planning guidance.</p>	

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								<p>The Designated Port Operational Area (TI35 in the current Island Plan) has been removed from the Draft Plan. This is unacceptable. The designated port area must be defined, respected and protected during any development of the surrounding area. The harbour in St Helier has been split into two Regeneration Zones encompassing most, not all, of the port operational area. The port operational area must be considered as a whole as operational areas are not currently split along the same lines. For example, 30% of the Island's freight arrives onto the New North Quay yet this area is included in the 'Old Harbours' Regeneration Zone. Also although the site of current major development, the Elizabeth Marina is not included in either Regeneration Zone. We would recommend that the Designated Port Operational Area (DPOA) be included in the Plan, taking primacy over the two proposed Regeneration Zones in the Draft Plan. They could be contained in a new 'Proposal12B Jersey Harbours Regeneration Zone' with the two proposed Zones taken out of Proposal 11 and included within this new section, which will bring clarity and focus to considerations regarding the greater harbour area, which are currently spread throughout the Plan. The Designated Port Operational Area should not be considered 'urban redevelopment' until an alternative location for the port has been developed and operational. Most importantly, the port area must be considered as a whole, and planning permission within the Port Operational Area not based purely on regeneration or urban redevelopment philosophies i.e. the planning permission for Port operational developments must not be based on how the port and its development may or may not meet urban design / regeneration requirements This is alluded to in 8.156. Until a new fit for purpose port area has been developed, the existing Port Operational Area, whilst designated as a regeneration zone, must be able to change and adapt to provide as efficient and operation as possible and it cannot have a planning regime aimed solely at regeneration imposed on it. There is no redundant land with the Port Operational Area. The operational port area is always going to impact on surrounding property and facilities through a variety of 'bad neighbour' issues, such as noise, dust and operational use and design. Such issues have already arisen with existing developments which are acting as a constraint on the practical operation of the port already. The</p>			

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								<p>ability to ensure the continuous operation of the port as a lifeline link should be taken into account when considering development on surrounding land. In the UK, a draft National Policy Statement for Ports is currently under consideration. This is a useful document which should be used to promote best practice in development at and around the port. It sets out the 'the broad need for ports capacity looking ahead to 2030 and beyond, taking account in particular of our forecasts of port freight demand and the regional and local economic benefits of port activity. It also restates the Government's long-standing policy that this need can be best be met by an efficient and competitive ports industry operating in a free-market environment'. This UK National Policy statement should be considered and encapsulated as appropriate with in Island Policies. Jersey Harbours has a policy to encourage warehouses to be located close to ship to reduce lorry movements. This should be reinforced by the Island Plan. Delays at the port, for example due to adverse weather, can result in a backlog of goods or vehicles (freight and passenger) which can impact on the road infrastructure. This needs to be taken into account at the planning stage. Any development in or around the port areas must take into account health and safety, and security issues. Proportionally protective security measures need to be designed into Regeneration Zones at an early stage of development. Ref: 4.75 The Trading Operation is not recognised as the responsible authority for future development of the port. There is no reference to the existing Port Masterplan. It is incorrect to state that 'crucially revenues from the current port operation cannot support a major capital improvement', although it may not be funded through the normal capital programme. It is also incorrect to state that a new port is only achievable through the realisation of the value of development in the Elizabeth Harbour area. This only applies to Ro-Ro operations. 'Old Harbours' - the New North Quay is included in this Zone. This quay currently accounts for approximately 30% of the Island's freight traffic. It must be considered as part of the operational port until such time as the facility is located elsewhere. The Marine Leisure industry provides a valuable growth area for the Island's economy and is not specifically mentioned in the Plan. Any regeneration of the Old Harbour needs consideration to the underlying need of the Island for additional moorings. The Plan should make</p>			



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								reference to the fact that existing resources are stretched and need to be addressed.			
DP989		Captain Howard Le Cornu	States of Jersey Harbours		Regeneration Zones	Objecting	Full consideration and reference should be made to the Harbours Trading Operation and Administration responsibilities as defined within the applicable Laws.	As an Island economy, Jersey is reliant on the provision of commercial port services and benefits from a growing marine leisure industry. Unlike other jurisdictions, Jersey Harbours is also responsible for the provision of coastguard services from the Island and its territorial waters. There is no reference within the Draft Island Plan to the Trading Operation, Jersey Harbours, as defined by Articles 25 to 27 of the Public Finance (Jersey) Law 2005 and Public Finances (Transitional Provisions - States Trading Operations) (Jersey) Regulations 2005. Regulation 3(4) defines 'the trading operation to be undertaken by Jersey Harbours shall be the administration, management, operation financing, development and maintenance of the harbours of Jersey and their associated facilities. The Harbour Master is responsible for the 'administration of harbours and territorial waters' - Harbours (Administration) (Jersey) Law 1961. This is clearly of significance to those areas of the draft Plan which refer to harbours, in particular, St Helier Harbour and the Regeneration Zones which have been proposed.	Reject	Such detailed reference is superfluous and not relevant to the draft Plan	The Minister is not minded to amend the draft Plan
DP311		Mrs Penelope Lee		Map 4.1	Town Regeneration Zones	Supporting			Noted	Noted	Support is noted by the Minister
DP1000		Captain Howard Le Cornu	States of Jersey Harbours	Proposal 11	St Helier Regeneration Zones	Objecting	Propose that consideration of use of land at St Helier Harbour should be included in the suggested Jersey harbours regeneration zone.	To ensure a co-ordinated approach to the development of the port operational area.	Reject	St Helier Harbour is included in the proposed Town Regeneration Zones. The Zone boundaries are not necessarily prescriptive.	The Minister is not minded to amend the draft Plan
DP1120		Mrs J Jones		Proposal 11	St Helier Regeneration Zones	Objecting	Bath Street - road reversal May I suggest that Minden Place is kept which I hope it will be as its location is ideal for shoppers and it does not affect a residential area, that instead of the traffic being one way from Minden Car Park going North up Bath Street, that the traffic from the North comes down as usual to Minden Car Park but leaves via Phillips Street with option to St Saviours Road or back via Belmont Road to the car park	This will achieve an area that can be paved area giving Mino's and others cafe access, tree planting etc without stopping access to Minden Car Park. Small as the area would be it is another gain for pedestrian only access except in emergencies.	Reject	Detailed proposals for the North of Town masterplan are presently the subject of detailed consideration and will be presented to the States for consideration and approval.	The Minister is not minded to amend the draft Plan presently as detailed proposals for the North of Town are presently the subject of consideration.
DP312		Mrs Penelope Lee		Proposal 11	St Helier Regeneration Zones	Supporting			Noted	Noted	Support is noted by the Minister
DP416		Mr Marc Burton	Institute of Directors	Proposal 11	St Helier Regeneration Zones	Supporting	The plan needs to have a more co-ordinated approach for St. Helier. The North Town Masterplan is in consultation but appears to be outside of the Island Plan. This must be co-ordinated and incorporated into the final document. Likewise for other studies recently completed by EDAW etc. What the Plan needs to address is the Masterplan for St. Helier. Whilst the plan maybe a general	See attached letter	Reject	The vision for St Helier is set out in 4.17 and has been informed by a number of strategic pieces of work leading up to the publication of the Draft Plan, including Willie Miller's St Helier Urban Character Appraisal; the St Helier Development and	The Minister is not minded to amend the draft Plan as the issues raised are already addressed

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							document, it should set out the parameters and timescales for establishing the co-ordinated vision for St. Helier i.e. Town, Waterfront, La Collette, Harbours etc; See attached letter			Regeneration Strategy (EDAW); and a number of pieces of work related to the development of the St Helier Waterfront (Hopkins and Shepley). It is acknowledged that further work is required to provide specific, more detailed, policies and proposals underneath this overarching vision for the town and this will be achieved by a number of work streams identified in the draft Plan as set out at Proposal 8; St Helier Conservation Areas; Proposals 9: Public realm Strategy; and, perhaps most significantly; Proposals 11: St Helier Regeneration Zones. All of this work will seek to build on, and enhance the local identity and character of these areas, seeking to enhance the quality of the local infrastructure, facilities and amenities of these specific areas. The North of Town Masterplan is one of the work streams identified as is complementary to the draft Plan.	
DP469		Mr Charles Alluto	The National Trust for Jersey	Proposal 11	St Helier Regeneration Zones	Objecting	Given that public intervention maybe required to initiate the development of these zones, the Trust believes that any such master plans should be subject to States approval and rigorous public engagement and consultation.		Reject	The Proposal makes it explicit that there will be extensive engagement with stakeholders in the development of master plans. Whilst the proposal seeks to include provision for the Minister to adopt and issue any such guidance, where States intervention is required, such as that involved in the North of Town for example, the Minister would be required to take the issue before the States as a matter of course.	The Minister is not minded to amend the draft Plan
DP530		Mr Paul Harding	The Association of Jersey Architects	Proposal 11	St Helier Regeneration Zones	Supporting	Proposals 1?14 & Policies BE1?BE3 - St Helier and other Regeneration / Local Development Zones We welcome and support the principal thrust of these sections, the proposals and Policies.		Noted	Noted	Support is noted by the Minister
DP606		Mr Bruce Willing		Proposal 11	St Helier Regeneration Zones	Objecting	St Helier must become a sustainable and polycentric, compact city. "Polycentric St Helier" simply means and divided into distinct neighbourhoods, each about 5 minutes walk (1/4 mile) in size in any direction. To achieve this each	For more than a millennium Jersey has developed a system of government that largely reflects its French past, with an emphasis on Parish identity, enshrined in a municipal system within each Parish under the leadership and control of the	Reject	The vision for St Helier is set out in 4.17 and has been informed by a number of strategic pieces of work leading up to the publication of the Draft Plan,	The Minister is not minded to amend the draft Plan as the issues raised are already

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							<p>district would have its own identity and management structure, subordinate to the Parish, but allowing residents to be able to express a social identity linked to the district. Each neighbourhood would have: A name and a unique sense of place A park, public square or civic space Connecting pedestrian and cycle links A mix of uses, shops, offices, affordable and open market homes etc. Car share schemes, free parking for electric vehicles and residents parking and so on would be provided Free bicycle share schemes - like Velib in Paris The new homes would be spacious and volumetrically efficient and of good design, thus adding value. The best of our architectural heritage would be celebrated and local business as well as the States could sponsor the neighbourhoods. In this way people would identify with their neighbourhoods and take ownership of them, once again, rediscovering a collective pride in St Helier.</p>	<p>Connétable. This historical emphasis on 'small government' is an essential part of the Jersey character. It is what makes "Jersey Special". This is not reflected in the DIP, which focuses on the archaeological and physical rather than the social organisation and practice within the island. It is therefore is the second flaw in the document as it can be argued the social structure of the island is a key factor in raising political and public concern over social breakdown, which is a key generator for initiating the DIP in the first place. What is needed is an understanding of a polycentric approach to town development, one that reflects the actual culture of the island and allows it to be reflected within St Helier.</p>		<p>including Willie Miller's St Helier Urban Character Appraisal; the St Helier Development and Regeneration Strategy (EDAW); and a number of pieces of work related to the development of the St Helier Waterfront (Hopkins and Shepley). It is acknowledged that further work is required to provide specific, more detailed, policies and proposals underneath this overarching vision for the town and this will be achieved by a number of work streams identified in the draft Plan as set out at Proposal 8; St Helier Conservation Areas; Proposals 9: Public Realm Strategy; and, perhaps most significantly; Proposals 11: St Helier Regeneration Zones. All of this work will seek to build on, and enhance the local identity and character of these areas, seeking to enhance the quality of the local infrastructure, facilities and amenities of these specific areas, reflecting the conceptual view set out in the representation made. Such work will also need to be complemented, in particular, by the Sustainable Transport Policy, to address issues of accessibility, movement and traffic management. Whilst the social organisation of the Island is acknowledged, a land use plan can only seek to maintain and bolster the social fabric of the Island through land use planning policies, which is what the draft Plan seeks to do. Notwithstanding, it is not necessarily considered that there is a strong level of social organisation below the parish level in Jersey, particularly in St Helier where, unlike many urban centres of a similar size, there are very few are based names for different parts of the town, perhaps reflecting a lack of social identity and cohesion?</p>	addressed

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DP667		Deputy James Reed	Education, Sport and Culture	Proposal 11	St Helier Regeneration Zones	Neither	A Steering Group has been appointed, by a decision of the States in January 2010, under my chairmanship in my capacity as ESC Minister, 'with the aim of producing a cohesive and realistic plan for the future development of Fort Regent'. The Steering Group will have regard to any existing planning policies that may apply to Fort Regent, and it plans to report back to the States in the early part of 2011. In the meantime, I would ask that the new Island Plan should take into account the formation of this Steering Group, and should allow scope for the Steering Group to make recommendations for the future of Fort Regent. At this early stage it is known whether any recommendations will have planning policy implications, and any such consequences would of course be discussed with Planning.		Noted	The establishment of a Steering Group to examine the future of Fort Regent is entirely consistent with and complementary to the proposal to develop a masterplan or development brief for the Regeneration Zone centred on Mont de la Ville (Proposal 11(2))	The Minister notes and supports the comments made
DP823		Mrs Susan Kerley		Proposal 11	St Helier Regeneration Zones	Supporting	I endorse the suggestions and comments made by the National Trust for Jersey on these policies and proposals		Noted	Noted	Support is noted by the Minister
DP849		Mr Rod McLaughlin		Proposal 11	St Helier Regeneration Zones	Supporting	Once again the opportunity to include cultural objectives in master-plans associated with the regeneration of St Helier is to be encouraged, particularly as they might involve the application of planning obligations or percentage for art contributions. It will be important that the opportunity is taken to consider projects generated by percentage for art as affording an opportunity to contribute to the wider character of the area rather than simply an adornment to a particular development. They also afford the opportunity to distinguish the different regeneration zones by reference to their character and history. This also applies to development outside town. (Consultation with the Cornite des Connetables in the preparation of the Public Art Strategy revealed a desire on the part of the parishes to be involved in local percentage for art project briefs.)		Noted	The potential for master plans to seek to develop, nature and enhance the specific identity and character of an area is noted and welcomed	Support is noted by the Minister
DP95		Mr Stephen de Gruchy		Proposal 11	St Helier Regeneration Zones	Supporting			Noted	Noted	Support is noted by the Minister
DP975		Mr. Maurice DUBRAS		Proposal 11	St Helier Regeneration Zones	Supporting	Built Environment This section of the Plan is comprehensive and I have no time now to delve into the detail. Having been born and brought up within the Town, I applaud much of what has been done in recent years to return it to the pedestrians. I have views on some of the proposals but am not in a position to comment now-rather too late! However, I do feel bound to say how pleased I am to note that the Town is being seen as a whole though with several regeneration zones. I firmly believed that the former Waterfront Board was not		Noted	Noted	Support is noted by the Minister

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							given sufficient mandate to consider those areas alongside the Waterfront as within its mandate to ensure integration. I shall watch this 'space' with more than a passing interest.				
DP313		Mrs Penelope Lee			Planning for Other Urban Areas	Objecting	No more development outside of St Helier		Reject	The Spatial Strategy proposed in the draft Plan seeks to ensure that all of the Island's existing Built-up Area contributes in some way to meeting the Island's development needs, which will involve some development outside of the defined Town of St Helier. The draft Plan also proposes a mechanism which enables some development to take place in some of the Island's northern rural parishes where there is clear justification to allow small-scale development in support of these smaller communities. To just limit the Island's development needs to St Helier is not considered to be sustainable.	The Minister is not minded to amend the draft Plan
DP1166		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
DP437		John Le Maistre	Jersey Farmers Union		Jersey Airport Regeneration Zone	Objecting	We are concerned that these proposals will mean the loss of good agricultural land and we would seek assurances that this is not the case. See attached letter		Reject	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	The Minister is not minded to amend the draft Plan



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										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. Any proposals which have implications for agricultural land would fall to be considered under Policy ERE1 and Policy NE7.	
DP825		Mrs Susan Kerley			Jersey Airport Regeneration Zone	Supporting	I endorse the suggestions and comments made by the National Trust for Jersey on these policies and proposals		Noted	Noted	Support is noted by the Minister
DP976		Mr. Maurice DUBRAS			Jersey Airport Regeneration Zone	Supporting	Similarly, the Airport Regeneration Zone concept. I have remained frustrated by the lack of an integrated approach for that critical area. To my mind it is an appropriate one for the consideration of introducing new elements of industry to the Island as part of the hoped-for diversification policy espoused by previous economic development sponsors.		Noted	Noted	Support is noted by the Minister
DP1067		Ray Shead	The Jersey Chamber of Commerce	Proposal 12	Jersey Airport Regeneration Zone	Supporting	Jersey airport should be encouraged to work with the private sector in redeveloping adjacent land to the airport, the income generated should go directly to the airport for future maintenance and infrastructure.		Noted	Any proposed development of land out with the operational area of Jersey Airport will need to be considered within the context of other policies of the Plan relating to the Green Zone (NE7); safeguarding agricultural land (ERE1) and protecting open space (SCO4).	The Minister is not minded to amend the draft Plan
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	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	The Minister is minded to amend the draft Plan to revise the boundary of the Jersey Airport Regeneration Zone

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								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.		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.	
DP531		Mr Paul Harding	The Association of Jersey Architects	Proposal 12	Jersey Airport Regeneration Zone	Supporting	Proposals 1?14 & Policies BE1?BE3 - St Helier and other Regeneration / Local Development Zones We welcome and support the principal thrust of these sections, the proposals and Policies.		Noted	Noted	Support is noted by the Minister
DP611		Mr Bruce Willing		Proposal 12	Jersey Airport Regeneration Zone	Supporting	This is a good idea, but needs to be included within an overall plan for Quennevais and may go as far as St Peter's village. (If the harbour area in St Helier is to be included in that town's regeneration, then so should the airport be included in a proper plan for the regeneration of Quennevais and St Aubin.)		Reject	Apart from transport and employment links, there is considered to be no overriding planning justification to integrate development at Jersey Airport with Les Quennevais and St Peter's Village. Indeed, it is likely to be more desirable, from the perspective of preventing urban sprawl and maintaining the specific identity of each area, that any existing open land between Les Quennevais and St Peter's Village and Jersey Airport, is maintained.	The Minister is not minded to amend the draft Plan
DP96		Mr Stephen de Gruchy		Proposal 12	Jersey Airport Regeneration Zone	Supporting			Noted	Noted	Support is noted by the Minister
DP995		Captain Howard Le Cornu	States of Jersey Harbours	Proposal 12	Jersey Airport Regeneration Zone	Neither	Suggest there could be another specific 'Jersey Harbours Regeneration Zone' proposal along the same lines as this .	We would recommend that the Port Operational Area be included in the Plan, taking primacy over the two proposed Regeneration Zones in the Draft Plan. They could be contained in a new 'Proposal12B Jersey Harbours Regeneration Zone' with the two proposed Zones taken out of Proposal 11 and included within this new section.	Reject	St Helier's harbours have a physical and spatial relationship with the town of St Helier which is why they are included in the St Helier Regeneration Zones: Jersey Airport does not have this relationship, which is why it is treated separately.	The Minister is not minded to amend the draft Plan
DP532		Mr Paul	The	Proposal	Local	Supporting	Proposals 1?14 & Policies BE1?BE3 - St Helier and		Noted	Noted	Support is noted

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		Harding	Associati on of Jersey Architec ts	13	Developm ent Plan		other Regeneration / Local Development Zones We welcome and support the principal thrust of these sections, the proposals and Policies.				by the Minister
DP97		Mr Stephen de Gruchy		Proposal 13	Local Developm ent Plan	Supporting			Noted	Noted	Support is noted by the Minister
DP314		Mrs Penelope Lee		Proposal 14	Village Plans	Supporting			Noted	Noted	Support is noted by the Minister
DP352		Mr Tony Gottard		Proposal 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
DP434		John Le Maistre	Jersey Farmers Union	Proposal 14	Village Plans	Objecting	We are deeply concerned that this proposal will allow developments on an Island-wide scale on good agricultural land. These policies, if adopted, would fly in the face of all the other intentions to protect our countryside from further developments and must be withdrawn. As the population is allowed to increase there is bound to be tremendous pressure to allow such developments as can be demonstrated by the recent rezoning of good agricultural land for first time buyers and retirement homes. We have been assured that the increase in demand for houses that will be inevitable with the proposed increase in the population can be satisfied by the development of brown field sites and therefore it will not be necessary to develop in the countryside.		Reject	The Minister will need to weigh the impact of any development proposals emerging from the proposed development of Village Plans on the countryside, including the loss of agricultural land, with the potential community benefit to be delivered by them. Clearly, proposals for new development in the villages will need to be supported by evidence of need and a justification relative to the social fabric of the parish and its community facilities and institutions.	The Minister is not minded to amend the draft Plan
DP476		Mr Charles Alluto	The National Trust for Jersey	Proposal 14	Village Plans	Objecting	The Trust would suggest that any village plans relating to the small settlements around the Parish Churches must include an historic character appraisal in order to highlight the significant attributes and special qualities of these areas, so that these are not undermined by unsuitable development and creeping urbanisation. The Trust would also recommend that any proposed village development plans should be subject to States approval.	Without such survey work there is a real danger that the special quality of Jersey's rural historic settlement areas will indeed be compromised, as illustrated by the recent re-development of M&S in St John and the improvements to the area immediately around St Martin's Parish Hall.	Reject	The proposal makes it clear that any development proposals must set out any potential impact upon the character of the villages. This should be based on an understanding and appreciation of the historical evolution of the settlement and should seek to minimise and ameliorate any adverse implications. The Minister will need to balance the impact of new development upon the historic fabric and character of existing settlements against the potential community benefit of new development, as evidenced by need. The Minister proposes to adopt village plans as supplementary planning guidance following extensive public	The Minister is not minded to amend the draft Plan

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										consultation, and does not intend taking them to the States as a matter of course.	
DP535		Mr Paul Harding	The Association of Jersey Architects	Proposal 14	Village Plans	Supporting	Proposals 1?14 & Policies BE1?BE3 - St Helier and other Regeneration / Local Development Zones We welcome and support the principal thrust of these sections, the proposals and Policies.		Noted	Noted	Support is noted by the Minister
DP613		Mr Bruce Willing		Proposal 14	Village Plans	Supporting		It is entirely logical to initiate 'village plans', but they must be consistent with the overall planning structure and pay particular attention to the social and environmental aspects of their development within each Parish.	Noted	Noted	The Minister notes the qualified support for this proposal
DP950		Deputy Philip Rondel	Parish of St John Working Party	Proposal 14	Village Plans	Supporting	The following key proposals by the Parish of St John were unanimously approved at a Parish Meeting held on 3 rd March 2010. 1. Support for the key principle of Proposal 14 in The (Draft) Jersey Island Plan 2009 (DJIP 2009) 2. There is a presumption that all future development on rezoned land in St John will be Parish-led 3. That Supplementary Planning Guidance procedures for future development in St John be introduced 4. That two Consultation Zones - around the rural settlements of St John's and Sion - be established 5. That the Parish of St John Working Party (The Working Party) represent the Parish as a "key stakeholder" in future consultations with the Planning Department - as defined under the DJIP 2009 6. That comprehensive and inclusive consultation take place on all issues considered under the DJIP 2009 within the Parish in the future		Noted	The support for the proposal is noted but the presumption that all future development on rezoned land in St John is parish-led cannot be delivered by the Island Plan. Decisions related to new development proposals should be related to land-use planning considerations rather than their delivery mechanism and whether or not that mechanism is vested with the parochial authority, provided that the outcome meets a specified planning need (e.g. for affordable homes)	Support is noted by the Minister
DP98		Mr Stephen de Gruchy		Proposal 14	Village Plans	Supporting	Support with caveat Whilst I am supportive of the concept of Village Plans I think they should be prepared by the Planning Dept in consultation with the relevant parochial authorities, the public and other stakeholders. If parochial authorities were responsible for preparing village plans I think there would be a danger of a lack of consistency of approach across the Island arising.		Noted	Whilst there may be consistency in the manner and form in which the plans are prepared and presented, each Village Plan will be required to ensure that it secures the relevant engagement and approval of various statutory agencies. The Minister for Planning and Environment will need to consider the Village Plans, not only from the perspective of the development needs and aspirations of that village or parish, but also with regard to the proper planning of the island as a whole, and ensure consistency with the planning framework for the Island provided by the Island Plan. It is considered that there is considerable advantage to be	The Minister for Planning and Environment is not minded to amend the draft Plan

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										secured from encouraging a community-led approach to these matters in that it can seek to achieve greater community involvement and ownership of the outcome. The Planning and Environment Department is and will assist in the development of Village Plans, as appropriate.	
DP315		Mrs Penelope Lee		Map 4.3	Green Backdrop Zone	Supporting			Noted	Noted	The Minister notes the support for the designation of Green Backdrop Zone
DP1041		Ray Shead	The Jersey Chamber of Commerce	Policy BE 3	Green Backdrop Zone	Supporting		This must be protected at all costs to retain Jersey's character and image.	Noted	Noted	Support is noted by the Minister
DP542		Mr Paul Harding	The Association of Jersey Architects	Policy BE 3	Green Backdrop Zone	Supporting	Proposals 1?14 & Policies BE1?BE3 - St Helier and other Regeneration / Local Development Zones We welcome and support the principal thrust of these sections, the proposals and Policies.		Noted	Noted	Support is noted by the Minister
DP543		Mr Paul Harding	The Association of Jersey Architects	Policy BE 3	Green Backdrop Zone	Objecting	We believe this is the appropriate place to address skylines, views and vistas.		Reject	Skylines, views and vistas, as addressed by Policy GD5, are material to other parts of the Island other than those designated as part of the Green Backdrop Zone. On this basis, it is appropriate that skylines, views and vistas throughout the Island, including those out with the GBZ, can be considered as a material consideration in the determination of planning applications, under Policy GD5.	The Minister is not minded to amend the draft Plan
DP566		Deputy John Le Fondre		Policy BE 3	Green Backdrop Zone	Objecting	Green Backdrop Zone - this comment probably applies to other zones as well - to me extensions to existing homes should be allowed, particularly where it may encourage multi generational living. This (in my view) would have a number of social benefits, including preservation of the family unit. Obviously loop holes have to be explored and closed where possible, however there needs to be a degree of flexibility built into policies such as BE 3, because it appears quite proscriptive as presently constructed, and as potentially interpreted.		Reject	The policy regime to be applied by the GBZ does not preclude the extension of existing dwellings, but simply requires the impact of any such proposal to be considered upon the landscape setting and character of the area. The policy ensures that this becomes a material consideration in the determination of any planning application affecting the GBZ.	The Minister is not minded to amend the draft Plan
DP977		Mr.		Policy BE	Green	Supporting	Green Backdrop Zone Coming closer to home, I am		Noted	Noted	Support is noted



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		Maurice DUBRAS		3	Backdrop Zone		glad to see the maintenance of this zoning. As a critical element of the lower part of St. Lawrence, it has been relied on to protect the escarpment from inappropriate development; this must be retained				by the Minister
DP99		Mr Stephen de Gruchy		Policy BE 3	Green Backdrop Zone	Supporting			Noted	Noted	Support is noted by the Minister
DP100		Mr Stephen de Gruchy		Policy BE 4	Shoreline Zone	Supporting			Noted	Noted	Support is noted by the Minister
DP1042		Ray Shead	The Jersey Chamber of Commerce	Policy BE 4	Shoreline Zone	Neither	Sufficient time will be needed for such protection to be put in place.		Reject	The Shoreline Zone policy is already in place in the 2002 Island Plan	The Minister is not minded to amend the draft Plan
DP316		Mrs Penelope Lee		Policy BE 4	Shoreline Zone	Supporting			Noted	Noted	Support is noted by the Minister
DP978		Mr. Maurice DUBRAS		Policy BE 4	Shoreline Zone	Supporting	Shoreline Zone As a part of the continuum of or extension to the Coastal National Park, this affords one element of protection to the 'meat in the sandwich' with the Green Backdrop Zone on the other side. As certain pressures due to the monetary affluence of some of the island community are manifest with acquisition of coastal land for sea-view homes, it is critical that the planning authority retains some powers to avoid further spoiling or loss of scarce shoreline open space.		Noted	Noted	Support is noted by the Minister
DP101		Mr Stephen de Gruchy		Policy BE 5	Tall Buildings	Supporting	Support with caveat I am of the view that this policy should apply where a building would rise "two or more" storeys above its neighbour (as opposed to the present wording of "more than two storeys").		Reject	The current policy is considered to contain a definition of 'tall buildings' that is sufficiently robust enough to ensure that it can be applied appropriately to those development proposals which require the issue of height to be a significant material consideration	The Minister is not minded to amend the draft Plan
DP1043		Ray Shead	The Jersey Chamber of Commerce	Policy BE 5	Tall Buildings	Supporting	Taller buildings will have benefits in that they will improve the efficiency of land use and density provided that tight design standards are applied.		Noted	Noted	Support is noted by the Minister
DP317		Mrs Penelope Lee		Policy BE 5	Tall Buildings	Supporting			Noted	Noted	Support is noted by the Minister
DP567		Deputy John Le Fondre		Policy BE 5	Tall Buildings	Supporting	Tall Buildings - as noted above I believe we should encourage taller (well designed) buildings in St Helier. I think a tall building these days should be		Noted	Despite the great variety of building styles and forms in the town, there is a relatively high	The Minister notes the qualified support

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							more than 5 storeys (I would personally suggest 7 in St Helier - perhaps just within named regeneration zones).			level of consistency in building height: the vast majority of buildings in St Helier are in the range of 2.5-3.5 storeys. On this basis, it is considered appropriate to define a tall building as five storeys in height, or more than two storeys above it's neighbour. The criteria set out in the policy do not preclude the approval of a tall building above five storeys in height.	for this policy
DP102		Mr Stephen de Gruchy		Policy BE 6	Building Alterations and Extensions	Supporting			Noted	Noted	Support is noted by the Minister
DP1044		Ray Shead	The Jersey Chamber of Commerce	Policy BE 6	Building Alterations and Extensions	Objecting	The criteria should include not only design and appearance but should also Building be performance related.		Reject	The requirement to address the environmental performance of a building or an extension to a building is a requirement of Policy SP2 and GD1(1).	The Minister is not minded to amend the draft Plan
DP318		Mrs Penelope Lee		Policy BE 6	Building Alterations and Extensions	Supporting			Noted	Noted	Support is noted by the Minister
DP103		Mr Stephen de Gruchy		Policy BE 7	Shop fronts	Supporting			Noted	Noted	Support is noted by the Minister
DP319		Mrs Penelope Lee		Policy BE 7	Shop fronts	Supporting			Noted	Noted	Support is noted by the Minister
DP104		Mr Stephen de Gruchy		Policy BE 8	Frontage Parking	Supporting			Noted	Noted	Support is noted by the Minister
DP320		Mrs Penelope Lee		Policy BE 8	Frontage Parking	Supporting			Noted	Noted	Support is noted by the Minister
DP105		Mr Stephen de Gruchy		Policy BE 9	Street furniture and materials	Supporting			Noted	Noted	Support is noted by the Minister
DP321		Mrs Penelope Lee		Policy BE 9	Street furniture and materials	Supporting			Noted	Noted	Support is noted by the Minister
DP850		Mr Rod Mcloughlin		Policy BE 9	Street furniture and materials	Supporting	The emphasis placed on appropriate street furniture and materials is welcomed, particularly as it affords an opportunity for a more 'legible' approach to the built environment with street furniture chosen to complement the essential		Noted	The support leant and the comments made in relation to this policy are noted.	Support is noted by the Minister

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							character of particular areas . Paragraph 4.113 rightly draws attention to the importance of ensuring that the General Development Order 2008 does not provide a lacuna in the measures adopted to ensure that the smaller details of the streetscape contribute positively to the ensemble. Reduction of 'visual clutter' is greatly to be welcomed, although provision of appropriate street furniture may also include the opportunity to design interpretation panels and display sites for cultural information which enhance public enjoyment of open spaces and reflect the quality of the cultural offering . Currently, there is a shortage of tastefully designed display areas to promote cultural activity supported directly or indirectly by the States or the Parishes. Centre Ville provided examples of this some years ago and it is effectively handled on the continent in ways which reinforce cultural distinctiveness. Such provision affords the opportunity for the States to help maximise the value of the investment it makes in the cultural organisations.				
DP1045		Ray Shead	The Jersey Chamber of Commerce	Policy BE 10	Roofscape	Supporting		Early consideration as part of the planning process will eliminate a lot of problem.	Noted	Noted	Support is noted by the Minister
DP106		Mr Stephen de Gruchy		Policy BE 10	Roofscape	Supporting			Noted	Noted	Support is noted by the Minister
DP322		Mrs Penelope Lee		Policy BE 10	Roofscape	Supporting			Noted	Noted	Support is noted by the Minister
DP612		Mr Bruce Willing		Policy BE 10	Roofscape	Objecting	There is a stricture on the raising of roof heights when replacing the M&E equipment on office buildings. The DIP needs to acknowledge that environmental considerations will be included within the Planning decision process, in case the introduction of this new requirement unnecessarily harms the overall environmental performance of the building in the future.	Constraints on building heights and the placing of M&E equipment, unconstrained use of colour and overly restricted requirements for the overall heights of building will mitigate against successful contemporary development, the continued development of a 'Jersey vernacular' and the full exploitation of technology, which will allow sustainable and environmentally friendly buildings to be developed within the DIP and ultimately the agreed Island Plan.	Reject	The proposed policy already acknowledges that environmental considerations will be material to the decision making process (see 4.120 and 4.121) which also sets out the requirement for building owners, developers and architects to explore all options to enhance the environmental performance of buildings whilst also seeking to ensure that the design of plant and machinery is integral to the building rather than simply seeking to site it on the roof of the building.	The Minister is not minded to amend the draft Plan

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Economy											
DP1008		Mr John Mesch	Council for the Protection of Jersey's Heritage	5	Economy	Objecting	9. In Section 5 on the economy it is remarkable that the second largest industry in Jersey, which is larger than tourism and agriculture combined, the one producing a third of all domestic waste and two thirds of inert waste and the one having the greatest impact on all aspects of the environment including the size of the Island's carbon footprint is not mentioned at all. It is recognised that the activities of the Construction/Demolition industry is controlled by enforcing planning and environmental policies laid out in the draft plan. Nonetheless, the seriously damaging effects this industry has on the natural environment and global warming should be addressed directly in the draft plan. (As a matter of interest it takes 50 years to recover the carbon expended in the construction of an energy efficient building).		Noted	The construction industry is indeed a significant part of the Island's economy but it only has an indirect impact upon economic land use issues addressed in this section of the Plan. The effects of this industry are dealt with more directly in other sections of the plan, such as the waste management and general development control policies sections.	Noted by the Minister
DP608		Mr Bruce Willing		5	Economy	Objecting	The Employment Land Section, in Section 5 of the DIP needs to be reviewed to ensure that Tourism, in particular, is not compromised by the removal of the 'Change of Use' provision and this broader approach that at least reviews the proposal for a MEP, submitted to Housing by the JFU in 2001.	Buried in Section 5, the Economy Section of the DIP is the "Protection of Employment Land" sub-section. There is no link within it to the statement in the Introduction to the DIP of the need to "maintain a strong, environmentally sustainable and diverse economy" . It is almost as if the Planning Department has not consulted with the Economic Development Department in drafting this part of the DIP. This part of the DIP fundamentally affects two economic sectors, Agriculture and Tourism. If the States Strategic Plan's key requirement (shown in bold above) is to be met, this section of the DIP needs revision. The land would be valued at £600,000 per acre, which would include all ancillary land and would include the removal and clearance of all structures to return the area to a green field site. The scheme would be voluntary and only available for a specified period of time. Any grower offering their unit for the scheme would be able to rent back the unit at a nominal charge until such time as the States wished to start development of that land. The future use of the land would be dictated by the States of Jersey in accordance with the recommendations contained in the Island Plan for the benefit of the people of Jersey." Regrettably the MEP was not adopted. If it had of been we probably would not be faced with a housing shortage 21e nine years later, a factor that directly relates to meeting the requirement for Affordable Homes. It is recommended that this MEP proposal be re-visited within the DIP. Tourism: The 'Change of Use' regulations have underpinned the	Noted and minded to review	The glasshouse exit strategy referred to was proposed in last Island Plan, however the assessment was that many of the sites either fell outside of the Spatial Strategy or were in prominent landscape areas. However Policy ERE7 proposes a mechanism for dealing with the problem of derelict glass and it is accepted that sites may become redundant during the plan period. Accordingly a review of this issue would be appropriate.	The Minister notes the comment and is minded to review the issue of redundant glass.

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								establishment and maintenance of the Financial and Legal services sector over the past thirty years by allowing local hotel and guest house owners a 'soft landing' as the economic conditions within their sector changed in parallel with the global tourism market. If the Protection of Employment Land section in the DIP is allowed to stand, it will remove 'Change of Use' to the detriment of the economy as a whole and the Tourism sector in particular.			
DP628		Mr Alan Le Rossigno I		5	Economy	Neither	Ideas have often been expressed about diversifying the economy and this is an urgent concern which should also have been aired before the Island Plan. There should be a clear Policy on increasing economic diversity to guide the land use plan. Presently the cross-section of economic activity is dangerously skewed to the finance industry with the result that the cross section of people in the island is odd. We used to have a much wider agricultural base and with trends to buy local produce and avoid transporting goods needlessly it occur to me that we should be promoting growers. With the world population increasing it may well be extremely important in the future to produce more food in the island. We used to have a mushroom farm, strawberry farm, tomato growers, flower growers and small market gardens producing a variety of vegetables and fruit. The continued loss of good agricultural land and glasshouses is short sighted. Several glasshouse areas are identified for development in the Island Plan. It seems to be foolhardy to re-allocate those glass house areas for "development" just because they are not viable at this time. They may once again be vital for re-developing a more diverse economy and I feel they should be encouraged to be used for agriculture. There seems to be much money spent on promoting finance and perhaps subsidies should be considered to promote agricultural expansion. I feel that it would be short sighted to accept that redundant glasshouses are no longer viable- we may be desperate to have glasshouses again in the future. Small growing businesses may prove to be successful economic concerns in the near future.		Noted	There are 2 key policies in the plan that aim to support the States strategic aim of a diverse economy SP5 and EO1. These are new policies and close liaison is expected with the Economic Development Department to ensure that these aims are met. Only a very small number of outworn and poor quality glasshouses have been identified in the plan for much needed category A family housing. The number of sites expected to be removed by the Minister following objections by the constables has further reduced this number.	Noted by the Minister
DP323		Mrs Penelope Lee			E: Introduction	Objecting	Immigration needs to be tightly controlled, we are currently importing problems.		Noted	The Plan responds to the Migration Policy as approved and adopted by the States	Noted by the Minister
DP37		Ms Chantal Gosselin			E: Introduction	Neither	Widen the horizons of tourism to provide a greater contribution to the economy and social fabric of the community.e.g Historical / Marine Biology/ Ecological Health or Cosmetic Surgery/ Educaiton/Langage/Sports Activities-the Is it goes on. Why cannot we focus on becoming a Marin	We need a more diverse profile of sources of income. We are experts in tourism but have a very narrow approach to marketing ourselves-simply as a holiday destination [ and even that we keep narrowly to just one or two markets in Europe and the UK!!-there is a global market out there we	Noted	Some of these comments fall outside the control of the Island plan. With regards to creating a marine centre or similar this would be subject to either; 1. States funding, and no States	Noted by the Minister



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							Biology Centre with our unique range of species both above and below the sea. This would not just attract tourists during all seasons, but also educational tourism visit schools/universities /research centres.etc We are also well positioned to develop a research entirely not alternative power sources-why don't we give a tax break to all companies wanting to set up business developing solar/hydro or wind power? So we become a centre of excellence for such areas	could be harnessing!!] But we have other attractions to offer and could develop more attractions that attract a wider more diverse audience. These centres would also acts as tourist attractions for the annual holiday/short break market, egg. Along the lines of the Eden Centre. [Cornwall has also become a cosmetic surgery holiday attraction!!] Turning Plemont in to a Marine centre or Alternative power research centre would add social cultural as well as economic benefits. Investing in Olympic level sports facilities- a ski slope and ice rink/ indoor multipurpose arena would add tourist as well economic appeal.		department has made a formal representation to put this idea forward, or 2. Private funding and equally no formal representation have been made. In either case existing policies are adequate to support such a proposal if it came forward and met the criteria of the policy (EVE1).	
DP987		Captain Howard Le Cornu	States of Jersey Harbours		E: Introduction	Objecting	Marine Leisure is not specifically mentioned within the plan, yet it arguably provides a valuable growth and diversification opportunity for the Islands economy. There should be a separate policy for Marine Leisure.	The Marine Leisure industry provides a valuable growth area for the Island's economy and is not specifically mentioned in the Plan. As well as the economic advantages, it provides valuable social, environmental and cultural opportunities for the Island. Growth also presents opportunities for tourism, sport and recreation in support of other States policies. A separate proposal should be made for Marine Leisure	Reject	The marine leisure industry is an important one to the economy and indeed has benefits to the Island's cultural, sporting and social opportunities. There are other areas of the plan however, such as the proposals related to the master planning work on the port areas that should address these points. A marine leisure policy is not warranted for inclusion into the economy section.	Minded not to support insertion of new marine leisure policy into Economy section.
DP568		Deputy John Le Fondre			E: Objectives and Indicators	Neither	Economy - as previously noted, certain parts of Town are looking very 'tired', run down, and with an increasing risk of vacancies. Hence new development on the Esplanade Quarter needs to be very carefully considered as regards the impact on the existing Central Town economy.		Noted		Noted by the Minister
DP853		Ed Le Quesne			E: Objectives and Indicators	Neither	I am not putting forward an item by item comment on the proposed plan, but would like to suggest a real change in mindset for Jersey as we are facing a very different world with a rising cost of energy and a growing concern about climate change. I would like to commend the case put forward by Michael Shuman, at a Chamber of Commerce lunch lecture in February It was well-summarised by Harry Candle in the JEP. (see attached) It is a real wake-up call for Jersey. He said that the TINA mindset (There is no alternative) believes in attracting Toyotas (i.e. big global companies) promoting exports (develop potato exports rather than local food) reassuring locals (big office buildings at the Waterfront and more immigration is what we need!) my examples in brackets for his 3 points. An example this month is to promote the case for an extra supermarket in Jersey, which will take more money out of the Jersey economy. The LOIS mindset (Locally owned, import substitution) looks forward to the time		Noted	These are laudable aims and ideas that are relevant at the States strategic policy level	Noted by the Minister

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							when oil prices are much higher and self-sufficiency becomes important. He mentioned the Transition Towns initiative in UK as similar. In the USA, it goes by the name of BALLE (Business Alliance of Local Living Economies) <a href="http://www.livingeconomies.org">www.livingeconomies.org</a> gives more details of what looks like a fast growing movement, as the massive amounts invested in mega banks have little effect on the small local economies. In Jersey we have the world's biggest banks, top 500, but can't organise a simple thrift club for ordinary people at St. Martin LOIS also has lots of good effects on civil society, with more participation He listed 6 P's Planning Plug the leaks where money is spent away rather than locally People Support local entrepreneurs Partners Compete through collaboration between local businesses Purse Harness pensions locally Our pension contributions could be invested in local enterprises Purchasing Support local campaigns i.e. Think twice, buy local Policy-making Remove the anti-LOIS bias. Don't keep inviting outside firms				
DP107		Mr Stephen de Gruchy		Objective E 1	Economy Objectives	Supporting			Noted		Noted by the Minister
DP29		Mr Terence Tanner		Objective E 1	Economy Objectives	Neither	It's no good talking about a diverse economy the States must make it possible for diversification to happen the Tax structure is solely written around the finance sector and personal taxation?	Because the finance sector is so movable it has no roots to hold it to our Island.	Noted	These comments are noted, but fall outside of the control of the Island Plan	Noted by the Minister
DP324		Mrs Penelope Lee		Objective E 1	Economy Objectives	Objecting	Economic growth should only be allowed to provide employment for the existing population. The increase in low wage employment frequently taken by immigrants should be discouraged		Noted	This is not an issue directly controlled by the Plan	Noted by the Minister
DP108		Mr Stephen de Gruchy		Policy E 1	Protection of Employment Land	Supporting			Noted		Noted by the Minister
DP1161		Mr Roberto Lora		Policy E 1	Protection of Employment Land	Objecting	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	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	Minister minded to support amendment to policy EO1

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								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!		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 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'	
DP388		Vallois		Policy E 1	Protection of Employment Land	Neither	Careful monitoring is mentioned under 5.22 however, it is questionable whether planning have the resource to "carefully" monitor this policy.	there is evidence that conditions placed upon businesses are not adhered to and cause problems for surrounding neighbours, pollution, health and safety etc particularly outside of St Helier therefore there are concerns that bringing in such a policy is enforceable in realistic terms.	Noted	The monitoring is related to the success of the policy i.e. loss or gain of employment sites, which can be monitored through the application process. The monitoring of conditions related to noise etc is often under the control of other departments such as Public Health.	Noted by the Minister
DP518		Mr Paul Harding	The Association of Jersey	Policy E 1	Protection of Employment Land	Objecting	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	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	Minded to support.	It is recognised that this policy is too prescriptive towards tourism based employment sites and that previous attempts to protect	Minister minded to support amendment to policy EO1

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			Architects				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.	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.		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 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'	
DP689		Mr	Style	Policy E	Protection	Objecting	Policy EI is contradicted by Policy BEI supported by		Agree	Remove the explicit reference in	Minister minded

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		Andrew Fleet	Group Ltd	1	of Employment Land		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 .			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; or 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.	to agree to proposed changes.
DP775		Seamus Morvan	Morvan Hotels	Policy E 1	Protection of Employment Land	Objecting	<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</p>	#N/A	Minded to support amendment to policy	It is recognised that this policy is too prescriptive towards tourism based employment sites and that previous attempts to protect prime 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	Minister minded to support amendment to policy EO1



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							<p>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 keep out of date hotel products within the industry (often without the economies of scale needed in today's high cost environment), this will act as an economic barrier to the creation of new tourism investment and will weaken the industry further.</p> <p>As a group of companies, we are committed to tourism and have a long history of investment into the sector. We have many sites that could comfortably grow in terms of the number of hotel beds, yet, without the capital realized from flexibility within our portfolio of sites, we do not feel that we would be able to take our business forward.</p> <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</p>			<p>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 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>	

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							<p>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 keep out of date hotel products within the industry (often without the economies of scale needed in today's high cost environment), this will act as an economic barrier to the creation of new tourism investment and will weaken the industry further.</p> <p>As a group of companies, we are committed to tourism and have a long history of investment into the sector. We have many sites that could comfortably grow in terms of the number of hotel beds, yet, without the capital realized from flexibility within our portfolio of sites, we do not feel that we would be able to take our business forward.</p>				
DP858		Gerald Fletcher	Jersey Hospitality Association	Policy E 1	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</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 prime 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</p>	Minister minded to support amendment to policy EO1

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								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'		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 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'	
DP109		Mr Stephen de Gruchy		Objective EO 1	Office Policy Objectives	Supporting			Noted		Noted by the Minister
DP325		Mrs Penelope Lee		Objective EO 1	Office Policy Objectives	Supporting			Noted		Noted by the Minister
DP1046		Ray Shead	The Jersey Chamber of Commerce	Policy EO 1	New Office Development	Supporting	This policy is agreed. Chamber would like to see an incentive to refurbish and re-use vacant offices and other buildings within St Helier, particularly if vacant space increases when the Waterfront is developed. This could be by way of reduced planning fees for such building or the removal of GST from building refurbishment costs. Out of town offices and home working should be permitted and encouraged as there would be environmental and		Comments noted and agreed with	- The re-development of outworn office space is seen as an important part of the regeneration of town. - There is a policy aimed at encouraging businesses run from the home (EO4). - Policy GD1 would cover the environmental issues surrounding office develo	Noted by the Minister

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							sustainable benefits. Where new offices are created their environmental impact should play a significant part in any approvals as well as their appearance.				
DP110		Mr Stephen de Gruchy		Policy EO 1	New Office Development	Supporting			Noted		Noted by the Minister
DP1111		Mr Ben Ludlam	C Le Masurier Ltd	Policy EO 1	New Office Development	Objecting		Again the plan is unclear; the development within the Town Centre is acceptable but should not be limited by 5.35 which indicates this should be primarily in the Esplanade Quarter. This is highly arbitrary and does not allow the market to operate freely.	Reject	This policy does not limit new office development to the Esplanade Quarter area only - 5.35 states that other areas within the town and the regeneration areas are also acceptable for office development. it is recognised however that the Esplanade Quarter area will represent , if developed, a significant area for office development. Policy E01 also includes Pier road/Commercial Buildings, North of Town master plan area and Gloucester street as potential new office areas.	The Minister is not minded to amend the draft Plan
DP326		Mrs Penelope Lee		Policy EO 1	New Office Development	Supporting			Noted		Noted by the Minister
DP111		Mr Stephen de Gruchy		Policy EO 2	Conversion of Upper Floors of Existing Commercial Buildings for Office Accommodation	Supporting			Noted		Noted by the Minister
DP112		Mr Stephen de Gruchy		Policy EO 3	Other Small Scale Office Developments	Supporting			Noted		Noted by the Minister
DP1047		Ray Shead	The Jersey Chamber of Commerce	Policy EO 4	Businesses Run From Home	Supporting		This is to be encouraged.	Noted		Noted by the Minister
DP113		Mr Stephen de		Policy EO 4	Businesses Run From	Supporting			Noted		Noted by the Minister

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		Gruchy			Home						
DP327		Mrs Penelope Lee		Policy EO 4	Businesses Run From Home	Supporting	Providing this does not entail increased traffic, particularly large vehicles		Noted	The policy and the supplementary guidance would not allow businesses run from the home that increased traffic or encouraged the use of large delivery vehicles.	Noted by the Minister
DP936		Mr James Godfrey	Royal Jersey Agricultural & Horticultural Society		Retail	Supporting	New retail floor space: The debate over the possible entrance to the Island of a 'third supermarket' demonstrates how muddled thinking has become in an effort to appear to be 'doing something'. There is nothing to stop new operators starting in the Island through acquisition and therefore attempts to encourage a new entrant through preferential treatment are unnecessary and potentially discriminatory.		Noted and agree with comments		Noted by the Minister
DP114		Mr Stephen de Gruchy		Objective ER 1	Retail Policy Objectives	Supporting			Noted		Noted by the Minister
DP328		Mrs Penelope Lee		Objective ER 1	Retail Policy Objectives	Supporting			Support Noted		Support is noted by the Minister
DP1048		Ray Shead	The Jersey Chamber of Commerce	Policy ER 1	Retail Expansion in the Town Centre	Supporting	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. 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. Springboard and ATCM have launched a new research tool aimed to deliver performance monitoring and benchmarking for town and city centres -link: <a href="http://www.milestoneuk.org/">http://www.milestoneuk.org/</a>		Agree with comments	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 .	Minister minded to support
DP1112		Mr Ben Ludlam	C Le Masurier Ltd	Policy ER 1	Retail Expansion in the Town Centre	Supporting		C Le Masurier Limited have extensive land holdings in Bath Street and Commercial/Broad Street, when, further, applications are made for development these will comply as far as possible with ER1. There should be a common goal to encourage public / private partnership in development and which should actively be pursued by the Planning Department in a coordinated inter governmental States of Jersey	Noted	Noted	Support is noted by the Minister



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								Dept approach, to improve St Helier.			
DP115		Mr Stephen de Gruchy		Policy ER 1	Retail Expansion in the Town Centre	Supporting			Noted		Noted by the Minister
DP329		Mrs Penelope Lee		Policy ER 1	Retail Expansion in the Town Centre	Supporting			Support Noted		Support is noted by the Minister
DP569		Deputy John Le Fondre		Policy ER 1	Retail Expansion in the Town Centre	Objecting	Land Between Broad Street and Commercial Street - I would be extremely concerned over this proposal. This seems a deliberate policy to shift the main centre of Town. It would in my view significantly devastate the areas in the region of the Central Markets, West's centre, Queen Street etc. This needs to be very carefully considered, obviously Chamber of Commerce needs to be consulted etc. I would probably not be able to support this as a proposal. I do agree that in theory some further route between Broad Street and the Esplanade Quarter might be a good idea except for the logistical issue of getting through from Commercial Street to the Esplanade, and then one would still need to walk the length of the Bus Station. Hence I am unclear as to how this could be achieved, and whether it is either practical or desirable.		Reject	It is not envisaged that the entire area be re-developed to retail as many existing non-retail businesses will remain. The DTZ report identified this area as the obvious future town retail expansion area that can also link well with the new offering on the Island site (liberty Wharf).	Concerns noted by Minister but minded not to amend Plan
DP1049		Ray Shead	The Jersey Chamber of Commerce	Policy ER 2	Protection and Promotion of St Helier for Shopping	Supporting	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. 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. Springboard and ATCM have launched a new research tool aimed to deliver performance monitoring and benchmarking for town and city centres -link: <a href="http://www.milestoneuk.org/">http://www.milestoneuk.org/</a>		Agree with Comments	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.	Noted by the Minister
DP116		Mr Stephen de Gruchy		Policy ER 2	Protection and Promotion of St	Supporting			Noted		Noted by the Minister

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					Helier for Shopping						
DP330		Mrs Penelope Lee		Policy ER 2	Protection and Promotion of St Helier for Shopping	Supporting			Support Noted		Support is noted by the Minister
DP1167		Kevin Pilley		Map 5.2	Town Centre	Neither	Title for map 5.2 needs to be changed to Core Retail Area	To promote clarity and remove ambiguity	Noted	Will Update Title	Noted by the Minister
DP1050		Ray Shead	The Jersey Chamber of Commerce	Policy ER 3	Protection And Promotion Of Local Shopping Centres	Supporting	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. 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. Springboard and ATCM have launched a new research tool aimed to deliver performance monitoring and benchmarking for town and city centres -link: <a href="http://www.milestoneuk.org/">http://www.milestoneuk.org/</a>		Agree with comments	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.	Noted by the Minister
DP117		Mr Stephen de Gruchy		Policy ER 3	Protection And Promotion Of Local Shopping Centres	Supporting			Noted		Noted by the Minister
DP331		Mrs Penelope Lee		Policy ER 3	Protection And Promotion Of Local Shopping Centres	Supporting	The increase in take away food and drink in out of town locations has led to litter in the countryside of huge proportions. No further licences should be granted for this form of business until the Parishes/States arrange for this litter to be removed		Noted	This is an issue for the Parish and licensing authorities	Noted by the Minister
DP389		Vallois		Policy ER 3	Protection And Promotion Of Local Shopping Centres	Supporting	I would like to emphasise the five oaks and bagatelle parade area	In considering protection and promotion of this area I would urge the department to take into account the uniqueness of the area in which there are 4 major roads and 1 lane adjoining a small roundabout of which gets severely congested at certain times of the day due to not only work time traffic of bagatelle road and St Saviours Hill being access to town centre from eastern and northern parishes but also the large amount of schools that are located within St Saviour which add to the	Noted	Traffic issues are considered as part of any planning application for commercial use in such areas and covered by existing policies in the plan such as strategic policy SP6 (reduce dependence upon car), general development policy GD1 and transport policies including TT9 (travel plans).	Noted by the Minister

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								traffic congestion at peak times of the day.			
DP118		Mr Stephen de Gruchy		Policy ER 4	Development Of Local Shops	Supporting			Noted		Noted by the Minister
DP332		Mrs Penelope Lee		Policy ER 4	Development Of Local Shops	Supporting			Support Noted		Support is noted by the Minister
DP119		Mr Stephen de Gruchy		Policy ER 5	Development of Evening Economy Uses	Supporting			Noted		Noted by the Minister
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
DP333		Mrs Penelope Lee		Policy ER 5	Development of Evening Economy Uses	Objecting	St Helier is a no-go location for many local people. We do not want to go to an environment of drunks and violence. The 'night time economy' ie selling as much alcohol as possible needs to be reduced and more strictly policed.	St Helier should be run for the needs of locals to be considered first.	noted	This is a parish/licensing authority issue.	Noted by the Minister
DP120		Mr Stephen de Gruchy		Policy ER 6	Take-Away Food Outlets	Supporting			Noted		Noted by the Minister
DP334		Mrs Penelope Lee		Policy ER 6	Take-Away Food Outlets	Supporting	The spread of take away food locations to the countryside should be stopped. Existing locations closed down. This has led to a massive increase in litter thrown on the edges of roads, in the hedgerows and countryside.	Unless the Parishes/States organise a comprehensive clean up of the litter disfiguring our countryside all out of town take aways should be closed down	Noted	This is a Parish/licensing authority issue	Noted by the Minister
DP570		Deputy John Le Fondre			Food Retailing Proposals	Supporting	Major Food Retail Outside of St Helier - Presumption against - agreed - I think the possibility of a third supermarket on the Island is not sustainable if one supports the local economy. Depending upon the operator, it could potentially seriously damage the wider retail local economy of		noted		Noted by the Minister

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							this Island.				
DP1051		Ray Shead	The Jersey Chamber of Commerce	Policy ER 7	Food Retailing Proposals	Supporting	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. 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. Springboard and ATCM have launched a new research tool aimed to deliver performance monitoring and benchmarking for town and city centres -link: <a href="http://www.milestoneuk.org/">http://www.milestoneuk.org/</a>		agree with comments	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.	Noted by the Minister
DP1113		Mr Ben Ludlam	C Le Masurier Ltd	Policy ER 7	Food Retailing Proposals	Objecting		The application of the policy is extremely arbitrary and so is the use of Sequential Testing. It is also contra to the Economic Development Departments report/strategy on retailing.	Reject	The policy fits within the strategic aims of the plan (SP1 - spatial strategy, SP3 - sequential development). The sequential test is not arbitrary and is flexible to allow development outside of the town where evidence shows that they will not harm the vitality or viability of the town centre. See comment on DP410.	The Minister is not minded to amend the draft Plan
DP121		Mr Stephen de Gruchy		Policy ER 7	Food Retailing Proposals	Supporting			Noted		Noted by the Minister
DP335		Mrs Penelope Lee		Policy ER 7	Food Retailing Proposals	Supporting			Support noted		Support is noted by the Minister
DP410		Mr Nathan Fox		Policy ER 7	Food Retailing Proposals	Objecting	While some of the issues raised by EDD in response to earlier drafts have been addressed, there has been no practical movement in respect of the development of a new food retail competitor. The revised Island Plan White Paper still contains numerous policies that any proposed large food retail development would have the greatest difficulty in meeting while remaining commercially viable. Realistically, the development of a new-build competitor to resolve the issues of over-concentration in Jersey's food retail market is all but precluded by the Island Plan as currently drafted. EDD is of the opinion that issues of market concentration could be much more effectively	Background EDD has been involved in the Island Plan review process in an attempt to ensure that the revised Island Plan, when completed, will not preclude the entry of an additional large-scale competitor into the food retail market. Such a competitor should reduce the problem of market concentration and exert downward pressure on food prices to consumers. The entry of an additional competitor into the Island's food retail market is widely supported by the public, as evidenced by a Statistics Unit survey in December 2008 which revealed 84% support for the entry of a new large food retail competitor. Key concerns Strategic Development has studied the revised	Reject	1. Capacity Studies The representations by EDD essentially comprise the view that the DTZ Jersey Retail Study is not appropriate as a material consideration in informing planning policy and determining planning applications. They also comprise suggested amendments to the Draft Plan, the effect of which would be substantially to weaken planning control over large food store developments and other out-of-centre retail	Minister not minded to support proposed amendments

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							addressed were a system of sequential testing to be implemented which, once an appropriate site was established, acted to modify the related policies concerning large retail developments to facilitate development of that site. See attached letter	Island Plan White Paper, in comparison with the earlier July version of that document, in light of the requested amendments to the 'Economic' section policies regarding retail development (ER policies) that it has previously submitted to the PED. Although some of EDD's points have been incorporated (notably that Policy ER2 now refers to 'retail efficiency' and the DTZ report is no longer referred to as a 'material consideration', although its assumptions are still embedded in the document) the majority of the concerns previously raised by EDD remain. EDD's key concerns are that any prospective large food retail development will be unable to meet the policy requirements of the Island Plan as these include- An assumption of little or no demand for additional food retail based on a land-use survey. The advice of the States Economic Adviser makes it clear that capacity considerations alone cannot be used as a basis for decision making in this area. Overprotection of existing retail centres limiting retail efficiency. A general presumption against the development of a large food retail competitor outside of the town centre, with the removal of the 'Countryside Zone', potentially acting to further restrict acceptable development opportunities. A 'sequential test' which would act to establish a preference order for prospective sites, but which does not interact with the ER policies. 1 - Demand levels The artificially low assumption of demand stems from reliance upon the DTZ report, a capacity analysis that describes itself as ' primarily a land use planning study' and which ' does not consider retail prices or the number of food store operators on the Island' This report was quoted in the July version and referred to as a 'material consideration' in respect of future retail developments. The term 'material consideration' was removed by PED at the request of EDD in the September version. While the removal of the DTZ report as the sole material consideration for judging the need for additional retail developments is a positive step, the Island Plan text retains comments extracted from that report in key areas. These include a statement that population and per capita growth will permit a ' modest amount of additional food retail floorspace in or on the edge of the town centre ' and ' there is no quantitative capacity for additional food store floorspace up to 2015' .This seems to indicate that while DTZ is no longer explicitly relied upon, the revised Island Plan White Paper still predetermines that the Island is		developments. In the UK, most local planning authorities have commissioned similar retail studies to form part of the evidence base for their development plan policies; and such studies are widely accepted by Planning Inspectors and the Secretary of State as being appropriate to inform policy. The essential requirement of such a study is to answer the questions 'how much new retail floorspace, of what type, will be needed, where, and by when?', and then to find ways of accommodating the identified needs in accordance with sound principles of town and country planning. This enables the development plan to plan positively for accommodating expected needs for new development. Clearly if there is no need for new development, it is not necessary to identify and allocate sites for it; and in such a case, criteria-based policies are normally sufficient to cater for unexpected needs which might arise during the plan period. This is the approach which has been adopted in Jersey with the Jersey Retail Study and Draft Island Plan. It therefore accords with good planning practice. In addition to forecasting quantitative retail development needs, such capacity studies also assesses qualitative needs for new food stores and other retail development. If this shows that the existing stores are obviously out-dated, inefficiently laid out, or badly operated, it would lead to the conclusion that there was a qualitative need for modernisation, either through refurbishment of existing stores, or development of new stores. They also consider whether there is a good range of types of food stores and other retailing. In the	



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								<p>not in need of additional food retail development. In making this statement, the Plan is clearly inconsistent with the retail strategy and, in particular, the policy of introducing greater competition into the food retail market which is overwhelmingly supported by the public. This places a significant hurdle in the way of a new large food retail development. Policies ER 7 and ER 8 require that a 'demonstrable' or 'quantitative and qualitative' need be established for an additional non-central retail development. This will probably be hard if not impossible to achieve when the stated position of the determining body is that this need does not exist. Therefore, far from being an enabling document, the Plan is a barrier to EDD retail policy. The States Economic Advisor has expressed concern over the use of capacity studies in recent advice (attached). 2 - Detriment of existing centres The criterion that 'detriment' must not be caused to the 'vitality or viability of St. Helier town centre' remains within Policy ER7. This seems to be a tightening of the criteria in comparison with the 2002 Island Plan which used the term 'unreasonable detriment' in this instance. 'Detriment' is open to interpretation, but could be seen as a reference to the flow of expenditure and customers. If a development can violate policy on the grounds that it might attract expenditure and customers, (as addressed in EDD's initial response to the White Paper,) any such development can be refused. As any new food retail competitor would only enter the market if it had an expectation of making a profit (by serving customers and receiving income), any non-central retail development that is expected to be commercially successful would appear to be against Island Plan policies as it might well reduce the flow of business to the existing centres of St. Helier. It is difficult to see how market concentration can be effectively addressed when operator's in particular geographic positions enjoy special protection under the Island Plan. Requirements of Policies ER7, ER8 (if unreasonably detrimental) and ER2 (by reference to ER7) can not be met by any development that is detrimental to the vitality and viability of St. Helier town centre. The States Economic Advisor has addressed concerns about the effects of non-central retail developments on the vitality of town centres in general in his recent advice (attached). 3 - Presumptions against Many of the economic policies in the Island Plan White Paper contain presumptions against large retail developments outside of St. Helier town centre.</p>		<p>case of the DTZ report, this qualitative review identified the need for up to two discount food supermarkets on the Island, and the Retail Study recommended that such stores should be developed in order to widen the range of food stores and introduce one or more additional retailers. It is therefore not correct that 'the revised Island Plan White Paper still predetermines that the Island is not in need of additional food retail development'. However the review of qualitative needs did not identify any other clear qualitative deficiencies in the existing provision of food stores on the Island. The department is therefore of the view that the Jersey Retail Study 2008 carried out by DTZ is a reliable part of the evidence base for the Island Plan, and is important for informing policy for new retail development. 2. Retail Strategy It is noted that EDD does not include in its representations any definition of 'retail efficiency'. If that is to be an objective of the Island Plan, it will be necessary to define it in terms which would enable it to be assessed by developers or retailers putting forward proposals for new stores, and measured by PED when considering planning applications. It is considered that such a definition should not be so narrow that it excludes the impact of proposed new retail development on existing fixed capital investment, existing Jersey businesses, and the economy of Jersey as a whole. If 'retail efficiency' is to an objective of the Plan, it should be balanced by wider objectives covering non-economic issues such as protection of the environment (as indicated in the concluding paragraph of the economic</p>	

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								<p>This effectively places a burden on the applicant to establish that the proposed development meets policies in other respects or alternatively that there was such benefit to the development (against a backdrop of DTZ which asserts that there is no need for such development) that the policy should be overridden. This is not in keeping with EDD's policy to reduce concentration in the food retail market. Policies ER2, ER4, ER7, ER8, and ER10 presume against the development of a large food retail competitor in a non-central location. In addition to these restrictions, the 'Countryside Zone' classification has been removed from the revised Island Plan White Paper, with the result that significant areas of non-urban space have moved into the 'Green Zone', and accordingly are subject to a more rigorous 'test' for development, with a consequent reduction in the likelihood of new development being approved. This would act to restrict edge-of-town sites, should it be found that no central, non-central or other sites within the Built-Up Area were suitable. 4 - The sequential test Policy SP 3 details a sequential approach to development. In terms of retail development this appears to restrict development of sites outside the town centre until it can be established that there are no suitable site in more central locations. EDD understands that this was included following discussions concerning the desirability of developing the Island Plan so that it could meet the requirements of both PED and EDD. However, given a (not unrealistic) set of circumstances in which an non-central site were to be the only possible location, the sequential test would not properly engage with the other policies, which would contradict the purpose of the test by continuing to restrict development. The proposed development must still meet all of the criteria of the policies detailed above. It is therefore not clear how the sequential test acts to meet EDD's requirement. EDD is concerned that the sequential test might prevent the consideration of a development too early on in the chain. It would be desirable from EDD's perspective if the latter stages of the sequential test included the options of 'outside town but within the built up area' and then 'edge of the built up area'. It is understood that, at this point in the sequential test, there would be a higher burden of proof required related to the benefit of the development to the Island, or some mechanism such as a public planning inquiry in relation to this. Having reflected on the approach to retail in the draft</p>		<p>advisors report), and quality of life on the Island. 3. Removal of Countryside Zone This has made the old 3 zoned sequence of countryside policies more straight forward by reducing and simplifying the zones to 2 - Green zone and Coastal National park. Both these zones are new and do not wholly reflect the previous policing wording. The new green zone policy respects that there are different character areas within it for example and there is now supplementary planning guidance that indicates what type of development is permitted in each distinct character area, based upon the 1999 land use character appraisal study. The development of large retail outlets within this revised zone would be judged it's merits and have to comply with policy ER7 and other relevant policies in the Plan. 4. Sequential Test The draft policy was re-drafted following discussions with EDD prior to the completion of the draft plan and the use of the DTZ report as the sole material consideration for judging the need for additional retail developments was removed. This was replaced with a new policy criterion that new retail development outside St Helier Town Centre should not cause an unacceptable impact on the vitality and viability of the town centre; so as to replace the assessment of need in the Jersey Retail Study with a new impact test. This amendment should obviate the need for the amendments proposed by EDD - but is less liberal because it includes a need criterion. This would help to avoid serious adverse impact on the vitality and viability of the town centre and wastage of existing fixed capital investment through over-provision and consequent store</p>	

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								White Paper, and recognising that the Island Plan will cover a long period of time, EDD would welcome a further discussion with PED on the merit of applying a modified sequential approach to retail provision in general, rather than restricting this to major food retail only. See attached letter		closures. it is considered that this is a more appropriate way forward than the amendments proposed by EDD. The latter would amount to a virtual carte blanche to developers of out-of-centre superstores, because the sequential approach would in effect become the principal determinant of acceptability. In view of the relative greater difficulty in developing urban rather than out of centre sites for large food stores, it would be simple for developers to demonstrate that such stores could only be developed on out-of-centre sites. If there was no need or impact test, there would then be no effective way of restraining over-provision of food stores or other retail development.	
DP571		Deputy John Le Fondre		Policy ER 7	Food Retailing Proposals	Objecting	Food retailing Proposals - compared to the stated written presumption against major food retail development occurring outside of Town the actual policy seems rather more ambivalent. In my view this needs significant strengthening. It would seem to me that if an aggressive and litigious operator came to the Island, they would purport to demonstrate the need for their services, and therefore could potentially force the Minister into having to approve a scheme even if it was not supported by the various stake holders locally (including the Government). The wording of this policy should be a matter of legal advice.		comment s noted	legal advice is being sought on the key planning new and revised policies	Noted by the Minister
DP1052		Ray Shead	The Jersey Chamber of Commerce	Policy ER 8	Retail Warehouses	Objecting	Flexibility is required; conversion may be an option outside of St Helier if it is not to the detriment of other retail areas.		Reject	The potential impact development to the vitality and viability of the town is a key test and should not be watered down.	The Minister is not minded to amend the draft Plan
DP122		Mr Stephen de Gruchy		Policy ER 8	Retail Warehouses	Supporting			Noted		Noted by the Minister
DP336		Mrs Penelope Lee		Policy ER 8	Retail Warehouses	Supporting			Support Noted		Support is noted by the Minister
DP123		Mr Stephen de Gruchy		Policy ER 9	Retailing within Industrial Sites	Supporting			Support Noted		Support is noted by the Minister

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DP124		Mr Stephen de Gruchy		Policy ER 10	Retail Development Outside The Built-up Area	Supporting			Support Noted		Support is noted by the Minister
DP337		Mrs Penelope Lee		Policy ER 10	Retail Development Outside The Built-up Area	Supporting			Support Noted		Support is noted by the Minister
DP1053		Ray Shead	The Jersey Chamber of Commerce	Policy ER 11	Farm Shops	Supporting		Chamber is supportive of farm shops which have provided further choice for consumers but supports this policy which seeks to prevent the rezoning of agricultural land to retail use over a period of time.	Support noted		Support is noted by the Minister
DP125		Mr Stephen de Gruchy		Policy ER 11	Farm Shops	Supporting			Noted		Noted by the Minister
DP338		Mrs Penelope Lee		Policy ER 11	Farm Shops	Supporting	Additional take away business should be prohibited.	Litter from take away food and drink is blighting every road and hedgerows in the Island. We need Parish/States action to get this rubbish removed.	Reject	This is a Parish/licensing authority issue	comments noted minded to reject
DP432		John Le Maistre	Jersey Farmers Union	Policy ER 11	Farm Shops	Objecting	It is felt that 100 sq.m. (gross) is unrealistically small and there is a danger of the outlet being too small to be viable. See attached Letter	It is felt that every outlet should be dealt with on its own merits.	Reject	It is recognised that farm shops can only be operated profitably where they are able to sell non-seasonal produce, imported goods, and some non-food goods (such as craft products, garden supplies, home wares, toys, etc), because of the seasonality of local agricultural produce and the need to retain a loyal customer base throughout the year. There are already examples on Jersey of farm shops selling such ranges of goods. The 100sqm (gross) floor area is practical; because it would ensure that the scale of non-local and non-food goods would be limited, and not such as to threaten the vitality and viability of St Helier Town Centre or any of the village centres, whilst being sub-serviant to the principal farming business activity.	The Minister is not minded to amend the draft Plan
DP893		Mr Iain Norris		Policy ER 11	Farm Shops	Supporting	5.87 Sale of local produce should be a major justification. Guidelines regarding quantities need to be agreed and documented. 5.89 Recognises that farm shops may need to bring in non-local produce but that conditions may be imposed. What		Agree	It is recognised that it may sometimes be desirable to attach conditions to planning permissions, restricting the ranges of goods which may be	Minister minded to support

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							conditions are being considered because depending on the percentage of local vs imported produce that can be sold it may make the proposal non viable. Guidelines therefore need to be available for the applicant to consider at the business planning stage.			<p>sold or the amount of floorspace which may be used for the sale of non-local and non-food goods. It is suggested that these should be of the form: 'The farm shop hereby permitted shall not be used for the sale of [insert proscribed goods].' 'Not more than [insert percentage] of the farm shop hereby permitted shall be used for the sale of non-locally-produced foods or non-food goods, assessed on average over the course of a year.' The list of proscribed goods will be a matter of judgement, depending upon the remoteness of the farm shop from existing village centres and its potential to serve a local community; but should probably include clothing and footwear; electrical goods; audio-visual equipment; furniture and floor coverings; jewellery, watches and clocks; newspapers, magazines and books; tobacco products; CDs, DVDs, and other recorded materials; chemists', medical and beauty products; bicycles and accessories; motor parts and accessories; post office goods and services. The percentage of the farm shop which may be used for non-locally produced goods or non-food goods is a matter of judgement. However, it is considered that 50% would be a reasonable proportion. This could be assessed on average over a year, because there could be times when there will be very little local produce available for sale, but at other times, it will be abundant. In order to maintain adequate sales and profitable operation, therefore the condition should allow a substantial proportion to be used for non-local or non-food goods for some parts of the year.</p>	
DP940		Mr James Godfrey	Royal Jersey Agricult	Policy ER 11	Farm Shops	Supporting	Farm shops: The growth of farm shops, where they truly support the local industry, is to be welcomed. There is a clear difference between a ' farm shop'		support Noted		Support is noted by the Minister



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			ural & Horticult ural Society				and a 'shop on a farm'. There has been a trend toward the development of ' farm supermarkets' that do less to support the local industry and turn into 'Trojan horses' to develop out of town retail and industrial offerings. The emphasis must be on supporting the traditional covered market in St Helier that forms such a distinctive feature of the town.				
DP339		Mrs Penelope Lee			EIW: Current Position	Supporting			Support noted		Support is noted by the Minister
DP996		Captain Howard Le Cornu	States of Jersey Harbour s		EIW: Current Position	Neither	Section 5.90 Could be re-titled 'Light Industry, Warehousing and Port Operations' support for Section 5.94	ref 5.90: The port is an industrial area and vital to the Island's economy. It must be protected as such and not threatened by alongside development. ref 5.94: We are pleased to see Marine Leisure defined as an emerging industry, and would like this see this strengthened and supported elsewhere in the plan (see other comments). 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 . The types of facilities which should be supported are: o Harbours, marinas and moorings o Designated anchorages o Launching and landing sites o Boat yards for building, storage, repairs and maintenance o Onshore facilities including shower and wash facilities, laundry, waste disposal and car parking o Clubs and teaching facilities o Car and trailer parking	Reject	The port is covered elsewhere in the plan (regeneration zones, transport section - port operations) and the port operational area is now to be included on the revised proposals map.	The Minister is not minded to amend the draft Plan
DP235		Mr Stephen de Gruchy		Objectiv e EIW 1	Light Industrial & Warehous ing Policy Objectives	Supporting			Support Noted	Noted	Support is noted by the Minister
DP997		Captain Howard Le Cornu	States of Jersey Harbour s		EIW: Policies	Neither	Further policy considerations	Use of land at La Collette - this area is part of the port (see TT35) and the policy and priority should be for port related use in this area. It is currently Jersey Harbours' policy to locate warehouses close to ships / appropriate port area to minimise lorry movements on the roads. This should be supported by the Island Plan.	Comment s noted	The future land use of la Collette will be subject to the master planning work that is currently being undertaken and this will be included in any supplementary guidance or updates to the plan document following the completion of this work.	Noted by the Minister
DP241		Mr Andrew Morris			Provision of Light Industrial and Warehous e Land	Objecting	My family and I strongly object to the proposal to extend Thistle Grove. It is important to realise the history of Thistle Grove when considering any proposed extension. Thistle Grove has developed over time via piecemeal change of use approvals of what was an existing agricultural site. This has now led to what exists, which is a culmination of low quality, unsightly agricultural buildings, having various usages in terms of companies, scattered		Comment s noted but not supporte d	1. Design The current site is indeed very unsightly and should the site be re-zoned then it would have to be done in a comprehensive manner that would in the Department's opinion improve the existing site in terms of both providing modern and much sought after	Comments noted by Minister but minded not to support removal of Thistlegrove light industrial extension from Plan.

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							<p>around the site. With the recent development of Regal's industrial building, whose mass is totally out of character and scale to the surrounding area, the site has become an eyesore. The surrounding area is made up of single storey dwellings with the occasional two storey house; many of which are of historic importance. This Regal's building would unfortunately set a precedent for any further extension to this site, which would further add to an unsightly overmassed development. Any future development of the industrial site will entail tall buildings of large volume in order to meet the market demand for this type of building whose criteria requires high eaves heights in order for storage and usage and large floor areas to make them economically viable. Therefore, if Thistle Grove is to be extended and redeveloped, it would lead to high buildings of large floor area. This would be totally at odds with the surrounding countryside character. The siting of Thistle Grove is in the heart of the countryside zone. There is no precedent, other than the existing unacceptably designed Regal's building, which would lead one to believe that this area could support an industrial site. The boundaries of the site, although hidden in some areas at this time by high hedges, which are uncharacteristic to the Jersey countryside, do not screen this area from the rest of the parishes of St John and St Lawrence. As this part of the island is relatively flat, any proposed development would be seen from vistas across the countryside and therefore would be unacceptable. Any amount of boundary treatment would not screen these buildings and would in itself only be seasonal and take an extremely long time to establish. Currently the road infrastructure to this area is unsuitable for heavy industrial traffic. Although the roads of La Rue de la Mare Ballam and La Rue des Bois are wide, they are limited by their size further to the south and further to the north. Heavy traffic would have to negotiate the thinner sections of road which would have a serious effect on road, pedestrian and traffic safety. It should also be noted that the roads of La Rue de la Mare Ballam and La Rue des Bois have very high speed traffic. These roads are a long straight stretch which have fast moving traffic over and above 40mph. We have made representation to the Constable and Deputy of St John together with the police, complaining about the speed of vehicles which, at some periods, exceed 70mph. Although we have complained about this, nothing has been done in order to control these speeds and it's therefore an ongoing</p>			<p>light industrial units and remove and improve upon the existing unsightly developments. The height, size, volume and location of the new units would be very carefully designed to minimise the impact of the development on the surrounding area. This would be done through the submission by the developer of a detailed development brief that would first need to be approved by the Minister before a planning application could be submitted. The brief would, as a minimum need to include issues of design together with all of the other concerns listed in the representation, including traffic, access, boundary treatments, and waste, on site operations and landscaping. 2. Location The location of this site is adjacent to an existing protected industrial site and the re-zoning proposal would be extending into adjacent sites that are currently in some form of semi-light industrial use. This industrial site is the only one of those protected on the island that can be extended in this manner and there is an evidenced need for this type of development on the Island. 3. Road Infrastructure/Access The existing industrial site is on a prime road network which is capable of serving the proposed extended site area. Access will only be served from this primary road and all other access points, such as that serving the Fencing Centre on la Rue de la Mare Ballam will be closed. 4. Waste Water Sufficient measures will need to be taken to ensure that waste water and all other services meet the current standards and regulations, such as those of Building control. 5. Boundary Treatment Successful boundary treatments, including buffer zones and other</p>	

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							<p>problem. If Thistle Grove was to expand, this would add further traffic onto these roads which would have an impact on the surrounding infrastructure and residential properties, which would have a serious effect on the existing amenity. Any increase in the numbers of people working on this proposed industrial estate would also have serious implications on traffic movements, not only at peak times, ie morning and evening, but also during the day via deliveries and traffic movements to and from these buildings. This would be wholly inappropriate for this quiet rural and residential area. This area of St John and St Lawrence has a very high water table and in times of heavy rainfall existing soakaways, road gullies and farmland do not cope. It would therefore imply that any future development at Thistle Grove would have an effect on this water table. I would suggest that the disposal of rainwater from this site would be a serious problem to overcome. The statement in the proposed Island Plan, "It is expected the proposed use will not have any significant impact on neighbouring uses and local environment" is, quite frankly, not true. As can be seen from my statements above, it will have an effect on the local residents in terms of traffic, noise, environment and also visual amenity and, dependant upon usage, air quality (air quality would be affected by increased traffic also). The statement in the proposed Island Plan that, "Existing boundaries are well established with a number of mature trees and hedgerows that provide good screening around most of the site" can only be described as woolly. Any screening in terms of vegetation is not permanent and is seasonable and can be altered or removed extremely easily which could further erode the visual amenity in this countryside setting. I would argue that the existing screen is inadequate and, due to its age, could not be described as sustainable. The proposal to give the boundary treatment and location of any development careful analysis is not, in my opinion, a valid reason for allowing this proposal to be brought forward. In my opinion, the very nature, size and type of buildings proposed in this area are wholly inappropriate for a countryside rural setting and would have an irreversible effect on the environment of the area. With regard to access, I would suggest that, due to the high speeds of traffic on this road as mentioned above, any access into this estate would be unacceptable, noting that the existing access onto La Grande Route de St Laurent/La Rue de la Mare Ballam/La Rue des Bois is currently dangerous due</p>			landscaping measures, will be essential to the success of the potential development to ensure that it's impact is minimised and this will be subject to approval at both the development brief and application stages.	

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							to the existing chicane to the south and also the entry of the existing road of La Rue de la Scelletterie. This existing small side road is limited for its vision lines by the existing registered listed house of Caen Lodge - therefore no improvement can be made. It should also be noted that St John is a rural parish with a large equestrian following and for pedestrians, cyclists and horse riders to use this road as they currently do with any increased traffic would be dangerous. The proposed Island Plan statement made in sections 5.117 to 5.120 does not provide enough detail and protection to this area to give me any belief that the site is appropriate for its proposed usage and should therefore be reconsidered. To summarise: I object to this proposal as it is completely out of character for its countryside setting and the infrastructure cannot take any further increase in traffic due to the physical restraints of the roadways and high speed traffic together with pedestrian and user safety. This proposal would irreversibly damage a countryside setting, affecting the amenity of local residents, the environment and the local biodiversity of the area. Finally, I live just to the north of this property and, whilst accepting that La Rue de la Mare Ballam is a main arterial route within the island, I do not wish to see any further increase in heavy traffic which would affect the air quality and increase the noise and vibration from heavy vehicles that already exists from Ronez, northern quarries and the traffic that serves the industrial sites further to the north into St John. I would therefore be obliged if you would remove this proposal from the proposed Island Plan and site industrial sites at more appropriate areas, closer to the ports and town, where developments and the population are to be targeted in this Island Plan, ie La Collette and La Collette 2.				
DP340		Mrs Penelope Lee			Provision of Light Industrial and Warehouse Land	Objecting	I agree totally with the other comment by A Morris regarding the proposed development at Thistlegrove. This is totally inappropriate for the area and will create larger vehicle traffic, often travelling at high speeds. This proposal should be dropped	Increase in traffic, increase in litter, ugly buildings like the Regal building.	Comments noted but rejected	See Comments made in DP241	Comments noted by Minister but not minded to remove of Thistlegrove light industrial extension from Plan.
DP426		John Le Maistre	Jersey Farmers Union		Provision of Light Industrial and Warehouse Land	Neither	Care should be taken to ensure that good agricultural facilities are not lost from the Industry (Ref: Para 5.114). See attached letter		Noted	Policy ERE5 should ensure that all relevant agricultural buildings remain in agricultural use.	Noted by the Minister
DP935		Mr	Royal		Provision	Supporting	New locations for light industry / warehousing:		Comment	Where there are genuine	Noted by the

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		James Godfrey	Jersey Agricultural & Horticultural Society		of Light Industrial and Warehouse Land		There may be a need to supply additional warehousing, although this should be concentrated in the industrial areas and not spread into the agricultural heartland.		s noted	redundancy issues with agricultural buildings, then these should be re-used for appropriate uses, including in some cases for light industrial.	Minister
DP1054		Ray Shead	The Jersey Chamber of Commerce	Policy EIW 1	Provision of Light Industrial and Warehouse Land	Objecting	Future warehousing of this nature should be sited at la Collette, this was always the intention. Low costs and appropriately sited locations such as East of Albert should Warehousing be considered. The type of facility run from these buildings needs to be considered as Objectives some activities which can attract higher rents may displace other activities to more rural locations with high levels of related transport needs.		comment s noted	In order to fulfil the demand levels for light industrial use, La Collette will be required as part of the overall supply to meet this demand, but currently there is no certainty on availability at La Collette until master planning work is complete. Given the current levels of demand, length of time in which la Collette will come on stream and suitability of Thistlegrove, this site is required to meet current demand levels. The type and nature of occupants of the proposed re-zoned light industrial site will be subject to approval in the development brief and planning application.	Comments noted by Minister but minded not to support removal of Thistlegrove light industrial extension from Plan.
DP126		Mr Stephen de Gruchy		Policy EIW 1	Provision of Light Industrial and Warehouse Land	Supporting			Noted		Noted by the Minister
DP22		Deputy Rondel		Policy EIW 1	Provision of Light Industrial and Warehouse Land	Objecting	I should like to comment On the Thistle Grove Industrial/Commercial site in that the are proposed goes well beyond the current site and is proposed to include la Bienvenue Farm, a new farming unit has only just been built within in the last several years. Northend Vineries a current glass house complex which is still in use north end Fencing Centre poly tunnels. la Rue de la Scelleterie which has several polly tunnels which could be removed and the land returned to green fields at little expense to the owner. I appreciate that commercial sites need to be found around the Island but having seen a new farm built on land behind Thistle Grove only a few years ago when the farmer had a perfectly good operation working the family farm half a mile away, only for that chicken farm to be sold to developers and Greenfields behind Thistle Grove be covered in concrete and the chicken farm and huts to continue in operation. If this farm is allowed to be come an industrial zone in this plan, will we see yet another operation move to yet another Greenfield given the farming community are permitted to ride-roughshod over the planning	See Attached letter	Reject	In order to develop the site in an orderly manner it is necessary to include Bienvenue farm. The site area as designated on the draft proposals map will be subject to a separate planning brief that will outline the areas of development and which will first need approval of the minister for Planning & Environment before the submission of a planning application. Should this re-zoning be approved and an application then be submitted by the owners of Bienvenue farm for a replacement elsewhere on a green field site, then this will be dealt on it's merits under the policies of the day.	The Minister is not minded to amend the draft Plan



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							laws? I accept Northend Vineries will at some time in the future no longer be viable and the site will become a brown field site the remainder Northend Fencing Centre poly tunnels and la Bienvenue Farm are a bridge too far.				
DP254		Mr & Mrs Lee		Policy EIW 1	Provision of Light Industrial and Warehouse Land	Objecting	As you can see we live adjacent to the current Thistle Storage Industrial Park and are concerned about the proposed plans for the extension of the area.	Would it not be more efficient to have an industrial Park near the town and harbour to prevent heavy vehicles having to travel on Jersey's already congested roads. At present St Lawrence main road is relatively busy and to enlarge the area to the extent on the Island Plan, will many industrial units, would generate an enormous increase in the volume of traffic, presumably most of this increase would be heavy goods vehicles. As you are aware this particular main road has some fairly narrow stretches, which already cause traffic problems unlike some of the other major roads on the Island. We appreciate that there is already an industrial area here, however they are set back from the main road and at present generate a manageable amount of traffic movement To incorporate the fencing centre and two of the local firms would be an enormous area containing a huge amount of large warehouses causing a large increase of traffic volume coming up the main road. At present at least some of the traffic i.e. For the fencing centre assumably uses St John's main road. Also I see in last night's JEP that 'The United Nations has estimated that food production must increase by 50% over the next 20 years'. Getting rid of two farms does not seem a good way to go about this! On a more personal level we gather our property at present is in an Industrial Zone and on the new Island Plan is to be changed to residential. If the above proposed plan goes ahead would it not be appropriate to include our site in the plan being as though we are going to be sandwiched between the new development on the north, south and east sides will be the main road being on the west! At present the access to the Industrial estate is very close to our driveway and property. Again if this plan proceeds I assume this access will be moved further north to avoid more disturbances to our property.	Objections noted but not supported	The development of this site will be in addition to any sites developed near the harbour areas, such is the size and nature of the demand for light industrial development. La Collette and the harbour areas are subject to further master planning work and this may release more light industrial land, but this is a longer term supply option and compromised by the Buncefield report which will restrict development opportunities at la Collette. The site is on a primary route that already serves an existing industrial site and 3 other commercial businesses where the proposed site is to be re-zoned and so the traffic movements are expected to be acceptable levels. The access points for the site will be off the main road. Although there will be the loss of farming units, the requirements for additional light industrial use mitigates this loss. It appears that an error in the 2002 zoning of the light industrial area was made and this has now been corrected. There will be no development to the south of the property and the other areas are existing light industrial uses.	Minister notes comments but minded not to amend Plan
DP341		Mrs Penelope Lee		Policy EIW 1	Provision of Light Industrial and Warehouse Land	Objecting	Agree totally with the other people objecting about the proposed development at Thistlegrove	More ugly buildings in the countryside, a large increase in traffic, often driven at high speeds, more litter thrown on the road and hedgerows.	Comments noted but rejected	See DP241	Comments noted by Minister but minded not to support removal of Thistlegrove light industrial extension from Plan.
DP633		Richard	Jersey	Policy	Provision	Supporting		We note the potential for La Collette Phase 2 and	Support	Housing is not planned for this	Noted by the

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		Plaster	Electricity plc	EIW 1	of Light Industrial and Warehouse Land			the proposals to make this area suitable for industrial warehousing, potential new harbour etc. We would be comfortable with this use, but would be concerned if proposals emerge that this area be used for housing. Our La Collette Power Station is located at the north end of this site and by its very nature is a heavy engineering , industrial site . With its likely continued use for standby emergency and peak load generation, it will never be an ideal neighbour to domestic developments, but we don't believe industrial or warehousing type developments should be a problem.	noted	area.	Minister
DP699		Conneta ble Deidre Mezbourian		Policy EIW 1	Provision of Light Industrial and Warehouse Land	Objecting	From: The Connétable of St Lawrence, Mrs Deidre Mezbourian, Deputy John Le Fondre, Deputy Edward Noel, Senator Alan Maclean As elected Members of the States, we submit the following comments for consideration regarding the proposal to extend the Thistle Grove Light Industry Site in St Lawrence. The St Lawrence Roads Committee supports our views with regard to the comments about traffic. Lack of Suitability It is regrettable that this former agricultural site has, over a number of years, received approval for change of use thereby allowing the site on a busy main road and in the middle of the countryside zone to be used for light industry. However, whilst we accept that this is the case and that industrial use is made of the site, we consider the proposal to extend is inappropriate for an area in the middle of the countryside zone. We regret that within the Draft Island Plan there is a negligible amount of information regarding these proposals (four paragraphs only, 5.117 to 5.120). We are told that the proposed boundary treatment and location of any new development within the proposed site will be subject to careful analysis as part of the approval of a development brief. We are told that a full development brief will be presented to the Minister for approval before the submission of a planning application It is clear that any development should take place in a co-ordinated manner. It is unacceptable that proposals to increase a light industry site within the middle of the countryside zone have been included for approval within this Draft Island Plan without first addressing issues such as: Design Service infrastructure Boundary Treatment Layout Landscaping Access Traffic Parking We submit that these matters must be addressed prior to receiving States consideration to extend the site. We note that the areas of land adjacent to the existing site which have been identified as being suitable for extension, include the existing commercial operations of North End Vineries, the Fencing		Comment noted - see comments below.	1. Design The current site is indeed very unsightly and should the site be re-zoned then it would have to be done in a comprehensive manner that would in the Department's opinion improve the existing site in terms of both providing modern and much sought after light industrial units and remove and improve upon the existing unsightly developments. The height, size, volume and location of the new units would be very carefully designed to minimise the impact of the development on the surrounding area. This would be done through the submission by the developer of a detailed development brief that would first need to be approved by the Minister before a planning application could be submitted. The brief would, as a minimum need to include issues of design together with all of the other concerns listed in the representation, including traffic, access, boundary treatments, and waste, on site operations and landscaping. 2. Location The location of this site is adjacent to an existing protected industrial site and the re-zoning proposal would be extending into adjacent sites that are currently in some form of semi-light industrial use. This industrial site is the only one of those protected on the island that can be extended in this manner and there is an	Comments noted by Minister but minded not to support removal of Thistle Grove light industrial extension from Plan.

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							Centre and Bienvenue Farm, together with two residential dwellings and workers accommodation. It is unclear to us whether the intention would be to re-zone surrounding green fields in order to increase the area of the site. We would not support re-zoning of green fields in order to extend this light industry site. We would not support the re-zoning of the existing poly tunnel site and submit that the area should be returned to agricultural use if no longer needed for poly tunnel use. We refute the assertion within the Draft Island Plan document that "it is expected the proposed use will not have any significant impact upon neighbouring uses and the local environment". It is clear that this will not be known until the following matters have been addressed: Design Service infrastructure Boundary Treatment Layout Landscaping Access Traffic Parking We note that the Transport & Technical Services Department consider the existing access points on La Rue de la Scelleterie to be unsuitable. Although if approved the access would be relocated to La Grande Route de St Laurent, a primary network road , the problem of traffic would not be resolved. It would lead to an increase in heavy industrial traffic and the inevitably of damage to the infrastructure, as well as affecting the amenity of neighbouring properties. We receive complaints from the public regarding heavy vehicles using narrow country roads and have no doubt that this too would be exacerbated should expansion be approved. The current Island Plan aims to reduce the detrimental impact of traffic upon people's lives and to limit the impact of noise and other nuisances; these considerations should also be taken into account when considering the viability of this proposed extension to the Thistlegrove site.			evidenced need for this type of development on the Island. 3. Road Infrastructure/Access The existing industrial site is on a prime road network which is capable of serving the proposed extended site area. Access will only be served from this primary road and all other access points, such as that serving the Fencing Centre on la Rue de la Mare Ballam will be closed. 4. Boundary Treatment Successful boundary treatments, including buffer zones and other landscaping measures, will be essential to the success of the potential development to ensure that it's impact is minimised and this will be subject to approval at both the development brief and application stages.	
DP802	Mr Michael Stein	Mr Michael Stein	MSPlanning Ltd	Policy EIW 1	Provision of Light Industrial and Warehouse Land	Supporting	North End Vineries, The Fencing Centre & Bienvenue Farm, La Rue de la Scelleterie, 51. Lawrence, JE3 1FZ Re-Zone Land as Extension to Exist in a Industrial Estate	I write in response to the Draft Island Plan White Paper and to the proposal to re-zone the above site as an extension of the Thistlegrove light industrial site. The North End Vineries site (including the Fencing Centre and Bienvenue Farm), as an extension to the Thistlegrove industrial site, is ideally suited to accommodate the required light industrial use because it can be developed in a manner that maintains the Island's environment whilst also contributing to the States of Jersey's commitment to creating a genuinely diverse economy. Moreover, the extension of the existing industrial estate will meet a pressing , and genuinely strategic, need for light industrial and warehouse land and as the only additional light industrial land provided in the Draft Island Plan is therefore crucial to developing the Island's	Noted	Noted	Support is noted by the Minister

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								economy. Finally, it will also enable inappropriate uses in the town of St. Helier and the Built-Up Area to relocate and release their existing sites for much needed residential development. 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			
DP127		Mr Stephen de Gruchy		Policy EIW 2	Protection of Existing Industrial Sites	Supporting	I feel that the policy should be amended to make it explicit that change of use/conversion to residential accommodation will not be permitted.		Noted but change to policy not required	The policy is designed to protect existing industrial units from other non related development types (including residential) and this is already explicitly stated: "Within the boundary of these sites, the introduction of non-industrial uses will not normally be permitted, unless related to and ancillary to the industrial use." There will always be unforeseen exceptions and residential development that is ancillary to the industrial use may still be permitted on a site, for example a care takers or site managers flat.	The Minister is not minded to amend the draft Plan
DP342		Mrs Penelope Lee		Policy EIW 2	Protection of Existing Industrial Sites	Objecting	Strongly object to the proposal to increase Thistle Grove		Objection Noted	See DP241	Objection by Minister but minded not to support removal of Thistle Grove light industrial extension from Plan.
DP572		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
DP661		Conneta ble Peter Hanning	Parish of St Saviour	Policy EIW 2	Protection of Existing Industrial Sites	Neither	Another prime example of the 'laissez-faire' attitude is the manner in which Rue des Pres Trading Estate has spiralled out of control. What was intended to be a light industrial estate accommodating a variety of potentially bad neighbour commercial enterprises, has now been permitted to adapt into retail outlets and showrooms. More disturbing is the emergence of residential accommodation being		Comments noted	Unauthorised works will be subject to enforcement action where they do not comply with planning permissions. The limited numbers of residential units at Rue des Pres are related to businesses where on-site residency is required for care	Noted by the Minister

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							created in such a potentially dangerous environment.			takers and staff.	
DP128		Mr Stephen de Gruchy		Policy EIW 3	Proposals For New Industrial Buildings	Supporting			Noted		Noted by the Minister
DP129		Mr Stephen de Gruchy		Policy EIW 4	Relocation Of Bad Neighbour Uses	Supporting			Noted		Noted by the Minister
DP130		Mr Stephen de Gruchy		Policy EIW 5	Extensions or Alterations To Existing Industrial Buildings	Supporting			Noted		Noted by the Minister
DP131		Mr Stephen de Gruchy		Policy EIW 6	New Industrial Development In The Countryside	Supporting			Noted		Noted by the Minister
DP664		Mr F J Fokkelman		Policy EIW 6	New Industrial Development In The Countryside	Neither	With reference to the 2010 draft Island Plan review, your attention is drawn to the change of use route which is often used by the agricultural sector. Many out of town commercial areas were originally agricultural buildings such as potato packing and storage sheds. Over time many of those have been transformed into industrial and commercial parks. An example may be given as the premises off the Route du Mont Mado. The premises were originally established for potato packing. A planning consent was obtained for part of the premises to be used for uses out with agriculture and first a glazing business was established, which moved from their premises in town to St. John. This was followed by any number of other businesses, commercial vehicle repair, distribution of bottled water etc. Whilst there is clearly no objection to the growth of the economy, this spreading of commerce all around the island will cause increased traffic on the roads, since clearly the economic hub in the Island is the St. Helier area and its adjacent areas. It also causes urban - rural commuting, since it is unlikely that employment can be legally restricted to persons living in the immediate vicinity to the business concerned. Even farm shops, which appear to be fully acceptable in the draft Plan, often become much more than a facility to sell farm produce, and can develop in large scale businesses, often along unsuitable and narrow roads. If it is intended to		comments noted	There are strong policies in the new plan that protects existing agricultural developments from change of use to other forms of development. Similarly, the new farm shops policy places restrictions on the development of these in order to protect the vitality of the town and markets.	Noted by the Minister



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							restrict development to the St. Helier and adjacent areas, it would seem logical to encourage businesses which serve the entire Island to become established in the St. Helier and adjacent areas, rather than all over the Island.				
DP440		John Le Maistre	Jersey Farmers Union		Rural and Marine Economy	Neither	Land Sub-Committee: We would like to see the establishment of a Land Sub-Committee consisting of members of the Planning Department and representatives of the Agricultural / Horticultural Industry who would meet to discuss any proposals to take land out of the Industry. We trust you will give this request due consideration. Farmers and growers are the guardians of the countryside and a viable Agricultural Industry is the most cost-effective way of managing the environment. The preservation and protection of agricultural land will encourage a sustainable and diverse Agricultural Industry. A vibrant Industry supplies high quality produce and creates employment. A potential future world food shortage has been widely documented and we feel that the Industry together with government have a shared moral responsibility to work together in a world increasingly threatened by food shortages and climate change.		Noted	This issue is not necessarily material to a land use planning framework. It is relevant to note, however, that consultation is undertaken with the Environmental Management and Rural Economy Team (EMRE) in relation to any applications which affect agricultural land. The planning application process remains open to general scrutiny and any comment from the JFU relating to proposals affecting agricultural land are welcomed.	The Minister notes the comments made but is not minded to amend the draft Plan
DP937		Mr James Godfrey	Royal Jersey Agricultural & Horticultural Society		Rural and Marine Economy	Neither	Agriculture and the economy: The use of GVA is a blunt instrument in assessing economic contribution of the agricultural sector. Considerable contributions are made by the sector to the overall efficiency of the economy that are uncharged, for example the provision of 'public' goods, the maintenance of road side verges, and the provision of north bound freight that improves operations and leads to cheaper import costs. It should be stated that a buoyant agricultural industry is the most economic way to maintain the countryside.		Comments noted	The comment is noted	Noted by the Minister
DP675		Mrs Sue Lissenden			ERE: Objectives	Supporting	The Countryside Renewal Scheme is excellent, provided it is adequately prepared and monitored.		Support Noted		Support is noted by the Minister
DP343		Mrs Penelope Lee		Objective ERE 1	Rural Economy Objectives	Supporting			Noted	Noted	Support is noted by the Minister
DP236		Mr Stephen de Gruchy		Proposal 15	Stewardship in Agriculture	Supporting			Noted	Noted	Support is noted by the Minister
DP344		Mrs Penelope Lee		Proposal 15	Stewardship in Agriculture	Supporting			Noted	Noted	Support is noted by the Minister
DP425		John Le Maistre	Jersey Farmers Union	Proposal 15	Stewardship in Agriculture	Supporting	We welcome any proposals that encourage good agricultural practice. We also welcome any assistance, particularly financial, that helps the Industry to maintain and enhance the		Noted	Noted	Support is noted by the Minister

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							environmental and aesthetic value of the countryside. See attached letter				
DP470		Mr Charles Alluto	The National Trust for Jersey	Proposal 15	Stewardship in Agriculture	Supporting	The Trust very much welcomes the Minister's commitment to supporting stewardship of the countryside. However, it is essential that this is accompanied by a commitment to maintain at the very minimum the existing level of funding within the Countryside Renewal Scheme. It should be noted that the schemes budget was recently cut by 50% despite Policy C1 in the existing Island Plan.		Noted	This proposal is consistent with the Countryside Renewal Scheme and will provide support to scheme emerging from it. Comments about the level of funding for the CRS are noted.	The Minister notes the qualified support for this proposal
DP826		Mrs Susan Kerley		Proposal 15	Stewardship in Agriculture	Supporting	I endorse the suggestions and comments made by the National Trust for Jersey on these policies and proposals		Noted		Support is noted by the Minister
DP939		Mr James Godfrey	Royal Jersey Agricultural & Horticultural Society	Proposal 15	Stewardship in Agriculture	Objecting	Horse livery: Whilst there may be an argument that commercial livery is an economic activity, and a debate as to whether it has reached saturation point, there has been excessive growth in 'private' equestrian facilities. These are often applied for as part of a process of increasing domestic curtilage and therefore these should not be considered a 'legitimate agricultural activity' and must be resisted. There is no information published on the extent of horse ownership or land use which is in stark contrast to the detailed information published about the agricultural sector. This must be addressed by requiring the compilation and publication of equivalent statistical information on equine use. The recent increase in post and rail fencing not only indicates a large scale loss of land from agricultural production but also dramatically changes the character of the countryside.		Noted	The definition of "agriculture" includes horticulture, fruit growing, seed growing, dairy farming, the breeding and keeping of livestock, the use of land as grazing land, meadow land, market gardens and nursery grounds; and references to "agricultural land" shall be construed accordingly; accordingly there is no change of use.	The Minister notes the concern
DP925		Mr Daniel Wimberley			Safeguarding Farmland	Supporting		presumption of keeping land in eg - YES	Noted		Support is noted by the Minister
DP133		Mr Stephen de Gruchy		Policy ERE 1	Safeguarding Agricultural Land	Supporting			Noted		Noted by the Minister
DP471		Mr Charles Alluto	The National Trust for Jersey	Policy ERE 1	Safeguarding Agricultural Land	Supporting	The Trust fully endorses and very much welcomes the objective of safeguarding the existing agricultural land bank.		Noted	Noted	Support is noted by the Minister
DP831		Mrs Susan Kerley		Policy ERE 1	Safeguarding Agricultural Land	Supporting	I endorse the suggestions and comments made by the National Trust for Jersey on these policies and proposals		noted		Support is noted by the Minister
DP894		Mr Iain Norris		Policy ERE 1	Safeguarding Agricultural Land	Neither	5.142 States that the Minister will generally support diversification where it does not create unwanted impacts. Guidelines are required about how such judgement is to be made and what impacts are to be avoided.		Noted	The very nature of diversification suggests that proposals are likely to be different, therefore it is difficult to provide a general guidance. Accordingly detailed	Noted by the Minister

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										advice will be sought from the relevant consultees on the merits of each proposal.	
DP906		Mr James Godfrey	Royal Jersey Agricultural & Horticultural Society	Policy ERE 1	Safeguarding Agricultural Land	Neither	2. There should be recognition that productive agricultural land is a precious natural resource that is becoming scarcer and as a result should be afforded the highest level of protection in recognition of global factors over a time span longer than that of the Island Plan.	The RJA&HS is broadly supportive of the key plan policies and is encouraged to note that there is an increased emphasis on resource protection and sustainability. That said the RJA&HS believes that the plan needs to positively state the reasons behind the need for resource protection, particularly in relation to the countryside, and further enhance the powers to protect agricultural land. Protecting the countryside as a resource: It is important that the rural areas of the Island are afforded the highest degree of protection and whilst the reasons for this may be taken as given it is felt important that they are highlighted to reinforce the basis of policy. The following should be iterated as the thesis for protection of the countryside as a valuable resource: The Island's countryside is different to most in Europe in that it has evolved as a highly intimate mix of land uses. This leads residents and visitors to feel 'closeness' to the community through a proximity which is not achieved in most other regions where there are distinct boundaries between different 'zones'. It is important to maintain the mix and balance of land use which people find of interest and leads to their enjoyment of the Island as a place to live and visit. The greatest threat to this currently is development. The beauty of the Island's countryside and natural areas are cited by visitors as the most important factor in their decision to visit and what they enjoyed the most. If the Island is to retain, and grow, a visitor economy in the future then protection of this resource must be core to that objective. The attraction, and retention, of highly mobile and wealthy individuals who contribute disproportionately to the success of the local economy is influenced by the natural beauty of the Island's environment. It is therefore important to retain, and improve, the character of this resource.	Noted	The plan not only seeks to protect agricultural land, but also the character of the Island's landscape. Agricultural land is protected from development by the Coastal National Park or green zone policies which make a strong presumption against development.	Noted by the Minister
DP911		Mr James Godfrey	Royal Jersey Agricultural & Horticultural Society	Policy ERE 1	Safeguarding Agricultural Land	Objecting	Specific recommendations: 1. A database of agricultural land should be established and monitored to see that agricultural land is being made available for primary production. 2. Any activity which prevents primary agricultural production being undertaken on agricultural land for any period in excess of one year should require permission for 'change of use'. Where 'change of use' is granted, it should only be for time limited periods. 3. Primary agricultural production should	Protection of agricultural land: The protection of agricultural land is an issue of the highest priority. The objective of protecting the countryside will not be achieved without the specific protection of agricultural land as a resource for primary agricultural production. A viable agricultural sector, which contributes to the diversity of the economy, can only be maintained if there is a 'bank' of agricultural land available at reasonable cost to the people with the necessary skills. There	Noted	The suggestions put forward will require a change in the agricultural law. The Island Plan policies could then defend agricultural land from the uses identified	The Minister notes the comments, however this plan does not seek to alter the agricultural laws

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							not include leisure equine activities, i.e. grazing of horses or constructing sand schools. 4. There should be a strong presumption against the granting of permission for a 'change of use' of agricultural land. 5. The current system of the applicant demonstrating a lack of demand is flawed, abused and should be abolished. It should be replaced by the principle t hat t he demand for agricultural land is cyclical and therefore lack of demand can only be established by long term lack of occupancy.	is an absence of detailed information on the bank of agricultural land available for primary production. The only source currently available is t he States of Jersey Agricultural Census, and returns from those producers who receive financial support, which does not cover all agricultural land. Data from t he census shows that there has been a decline in farmed land from 1970 approaching 30%. Much of the loss has been attributed anecdotally to permanent development, reversion of marginal land or change of use for community projects. In 2004 the Jersey Environment Forum recommended that research be undertaken to establish the status of the land bank and enhance protection of the resource. This has not been done. The primary method of protecting agricultural land must be through the planning process and this is not happening. In addition to the obvious loss of land through development there is a significant loss of land occurring through changes in use. Illustrated below are two examples in which land is being removed from agricultural use  Agricultural land loss: The paper is misleading in only examining the area of agricultural land from the year 2000. In fact there has been a loss of agricultural land in the order of 25% since 1970. The table below gives a researched indication as to the current and expected future usage of agricultural land bank: Jersey Royal potatoes 15,500 vv Local vegetable production 4,000 vv Dairying 12,000 vv Flowers 800 vv Protected crops 280 vv Total 32,580 vv This equates well to the agricultural returns figure of 32,554 verges and shows that there is little capacity to lose further land out of agricultural production without comprising the output of the industry. It should be noted that these figures account for double cropping and ' land swaps' that are a common feature of local agriculture. Another common feature of Jersey agriculture is the high proportion of rented land as opposed to owned land that is farmed by the occupier. It is estimated that this is in the region of 75% and leads the industry to being very vulnerable to changes in the land bank. Land classification: It is doubted that a workable system could be devised as an example, small parcels of land may not necessarily be of intrinsic agricultural value but they might be crucial to provide access linking blocks of land together and thus have strategic value. This quality may not always be constant and may lead to inappropriate classifications. Protection of agricultural land: The legal instruments are in			

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								place but it is contended that insufficient resources or emphasis has been put into the policing of the existing law and this has led to increasing loss of agricultural land and natural habitat through 'curtilage creep' as people extend their gardens. There are many examples available and greater emphasis must be placed on addressing this issue.			
DP945		Mr James Godfrey	Royal Jersey Agricultural & Horticultural Society	Policy ERE 1	Safeguarding Agricultural Land	Neither	Golf courses : The development of an additional golf course should not be permitted. There has been no evidence published on the benefits of further development, other than anecdotal evidence of 'full waiting lists' , or that it represents anything other than an inefficient form of land use only enjoyed on an exclusive basis. Studies show golf courses in themselves are often not economically viable without the secondary activities of retail, restaurants and accommodation and thus this is an example of a planning 'Trojan horse' to obtain otherwise unacceptable planning consents. It is understood that a scheme to create a new course in St Martin, using up some 370 verges of prime agricultural land, is being promoted and it should be noted that the industry can not afford to loose land on this scale in that area.		Noted	Policy ERE1 safeguards agricultural land first and foremost. Any proposal for a new golf course would need to be considered against Policy ERE1 and other countryside policies. The proposal for a new golf course would be an exception to the plan, for which the Minister would need to undertake a public enquiry.	Noted by the Minister
DP134		Mr Stephen de Gruchy		Policy ERE 2	Diversification of Agriculture and the Rural Economy	Supporting			Noted		Noted by the Minister
DP345		Mrs Penelope Lee		Policy ERE 2	Diversification of Agriculture and the Rural Economy	Supporting			Noted	Noted	Support is noted by the Minister
DP430		John Le Maistre	Jersey Farmers Union	Policy ERE 2	Diversification of Agriculture and the Rural Economy	Supporting	We regard this Policy positively.		Noted	Noted	Support is noted by the Minister
DP927		mr daniel wimberley			Enabling Development	Objecting	Enabling development: Should be scrapped or severely constrained.	Wide open to abuse. This has been a disaster, and creates extremely negative perceptions of the planning process	Noted	The policy for linked and enabling development was supported by the States when it was introduced in the Rural Economy Strategy. Any enabling development proposal will need to satisfy the relevant policies of the plan and the Minister will be required to hold a public enquiry prior to determining any	The Minister notes the comment, however there are policies and processes in place which will ensure that any application considered for



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										application.	enabling development is properly scrutinised.
DP135		Mr Stephen de Gruchy		Policy ERE 3	Enabling or Linked Development	Supporting			Noted		Noted by the Minister
DP472		Mr Charles Alluto	The National Trust for Jersey	Policy ERE 3	Enabling or Linked Development	Objecting	The Trust is unable to support the principle of this policy if it results in permitted development which is contrary to established planning policy in the Island Plan.	If the States of Jersey wishes to further support the agricultural industry for its custodianship of the countryside, which is a laudable aim in itself, then this should be done in a transparent and publicly accountable manner (such as through the grant system available under the Rural Initiative Scheme) and not at the expense of our rural environment. It is also unclear in the proposed policy as to what equates to a countryside asset. Surely the role of planning must be to protect the agricultural land bank from unsuitable development as opposed to making decisions regarding whether certain agricultural businesses should be subsidised via planning gain to undertake that role. This is particularly pertinent given that the greater part of Jersey's agricultural land ie the asset, lies outside the direct ownership of the working agricultural sector. The Trust is also of the view that the scenarios listed under 5.145 would potentially be permissible under Policy NE7 and therefore it is unclear as to what this policy is seeking to achieve. Finally very little hard evidence has been provided as to whether the flexibility afforded the agricultural sector in previous Island plans has secured the benefits it was intended to achieve, especially given the rapid and continuing consolidation that underlies the industry. Surely this needs to be adequately demonstrated before the sector is granted further planning advantages and concessions.	Noted	Policy ERE3 contains appropriate checks and balances to ensure that the concern raised can be adequately addressed in a publicly accountable manner	The Minister is not minded to amend the draft Plan
DP830		Mrs Susan Kerley		Policy ERE 3	Enabling or Linked Development	Objecting	I endorse the suggestions and comments made by the National Trust for Jersey on these policies and proposals		Noted		The Minister notes the objection to this policy
DP941		Mr James Godfrey	Royal Jersey Agricultural & Horticultural Society	Policy ERE 3	Enabling or Linked Development	Neither	Enabling development: There is a case for this, however, it must be well thought through in terms of what is permitted, how much value is realised and how it is re-invested & controlled. If this is implemented incorrectly it could be a 'Pandora's box' that develops into a method of bypassing normal planning controls.		Noted	The comment is noted and there are sufficient policies and processes in place to ensure proper scrutiny of any proposal for enabling development.	The Minister notes the comment. There are sufficient policies and processes in place to ensure proper scrutiny of any proposal for enabling development.

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DP136		Mr Stephen de Gruchy		Policy ERE 4	Change of Use and/or Conversion of Traditional Farm Buildings	Supporting			Noted		Noted by the Minister
DP473		Mr Charles Alluto	The National Trust for Jersey	Policy ERE 4	Change of Use and/or Conversion of Traditional Farm Buildings	Objecting	The Trust would request that this policy accords with Policy HE1		Reject	Policy ERE4 requires accordance with Policy GD1, which in turn requires Policy HE1 to be taken into account.	The Minister is not minded to amend the draft Plan as the issues raised are already adequately addressed
DP604		Mr Paul Le Claire		Policy ERE 4	Change of Use and/or Conversion of Traditional Farm Buildings	Supporting		I believe that a Policy should be created to allow for wise use of Countryside or Buildings in Agricultural use historically where a benefit can be demonstrated for amenity, recreation, leisure or culture	Noted		Support is noted by the Minister
DP827		Mrs Susan Kerley		Policy ERE 4	Change of Use and/or Conversion of Traditional Farm Buildings	Objecting	I endorse the suggestions and comments made by the National Trust for Jersey on these policies and proposals		noted		Noted by the Minister
DP877		Mr Stephen D Smith	Health Protection Services	Policy ERE 4	Change of Use and/or Conversion of Traditional Farm Buildings	Neither	The conversion of former farm complexes to mixed use for example noisy commercial activity next to new or existing living accommodation should be resisted. Those in tied accommodation can be subjected to noise nuisance but unwilling to complain for fear of losing their job and home.		This is covered by GD1 and Public Health Department noise policies and guidelines.		Noted by Minister but minded not to amend Plan.
DP573		Deputy John Le Fondre			Change of Use and Conversion of Modern Farm Buildings	Neither	Alternative Uses for Farm Buildings - This paragraph recommends a period of 5 years of agricultural use after which an alternative use might be considered. I would suggest this is increased to 10 years. The key issue is about deterring new construction in anticipation of future conversion.	The key issue is about deterring new construction in anticipation of future conversion.	Noted and minded to give further consideration in light of the Rural	The draft Rural Economy Strategy is currently being consulted on and it would be prudent to ensure that the 5 year period ties in with that Strategy	The Minister notes the comment and is minded to give further consideration in light of the Rural Economy Strategy review

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									Economy Strategy review		
DP137		Mr Stephen de Gruchy		Policy ERE 5	Change of Use And/or Conversion of Modern Farm Buildings	Supporting	I feel that the policy should be amended to make it explicit that change of use/conversion to residential accommodation will not be permitted.		Noted but Reject	The policy is designed to protect Modern Farm buildings from being converted to other non related development types (including residential) and this is already explicitly stated." If the Minister is satisfied that the building is redundant to the needs of the agricultural industry, then consideration may be given to an alternative use provided that the proposed use is appropriate to the Island's economic needs, such as light industry, warehousing or distribution uses." In addition this policy is further supported by Strategic policy SP5 (economic growth and diversification) and policy E1 (Protection of Employment Land). There is a case, however to amend the wording of the supporting text to directly reference these other policies. There will always be unforeseen exceptions and residential development in exceptional circumstances may be acceptable.	Minister minded to reject proposed change but accept amendment to supporting text to include references to strategic policy SP5 (economic growth and diversification) and policy E1 (Protection of Employment Land).
DP474		Mr Charles Alluto	The National Trust for Jersey	Policy ERE 5	Change of Use And/or Conversion of Modern Farm Buildings	Objecting	The Trust does not feel this policy is sufficiently comprehensive and in some ways fails to address the argument for removal as per 5.152.	If the Minister is going to grant permission for some of these buildings to be used for alternative uses, then it seems appropriate that this should be subject to substantial environmental/landscape gains including reduction in density, massing and scale as would apply to any other commercial undertaking within the Green Zone.	Reject	There are sufficient controls within Policy GD1 to ensure that the impact of any new use is managed appropriately	The Minister rejects the comment on the basis that there are sufficient controls within Policy GD1
DP832		Mrs Susan Kerley		Policy ERE 5	Change of Use And/or Conversion of Modern Farm Buildings	Objecting	I endorse the suggestions and comments made by the National Trust for Jersey on these policies and proposals		Noted		The Minister notes the objection to this policy
DP928		mr daniel wimberley		Policy ERE 5	Change of Use And/or Conversion of	Neither	5.152 and ERE 5 removal of no longer needed sheds should be possible for the Minister to call for this.		Reject	It is recognised that diversification will support the rural economy and redundant agricultural sheds provide a resource for alternative uses such	The Minister rejects the comment on the basis that there are sufficient

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					Modern Farm Buildings					as light industrial or storage use. There are sufficient controls in Policy GD1 to ensure any alternative use is properly managed.	controls in Policy GD1 to ensure any alternative use is properly managed.
DP138		Mr Stephen de Gruchy		Policy ERE 6	New Agricultural Buildings, Extensions , And Horticultural Structures .	Supporting			Noted		Noted by the Minister
DP427		John Le Maistre	Jersey Farmers Union	Policy ERE 6	New Agricultural Buildings, Extensions , And Horticultural Structures .	Objecting	See attached letter	It is vital that agricultural businesses are allowed to develop premises that are adequate for today's needs.	Reject	The proposed policy regime does not preclude the development of new agricultural buildings but rather sets out a series of tests that need to be satisfied to ensure that a sound case can be made for allowing their development	The Minister is not minded to amend the draft Plan
DP475		Mr Charles Alluto	The National Trust for Jersey	Policy ERE 6	New Agricultural Buildings, Extensions , And Horticultural Structures .	Objecting	The Trust is of the view that the Minister should extend the condition for removal to all new modern agricultural sheds and not just temporary horticultural structures. This will ensure that sheds are only erected by those who have a long term commitment to the agricultural industry and not an agenda for alternative uses beyond the 5 year period. This policy also begs the question as to why the horticultural sector should be treated any differently from the rest of the agricultural industry.		Noted	Redundant agricultural buildings are regarded as an important resource for future industrial space. It is accepted that there may be circumstance where change of use is unacceptable, however this is likely to be the exception rather than the rule.	Noted by the Minister
DP833		Mrs Susan Kerley		Policy ERE 6	New Agricultural Buildings, Extensions , And Horticultural Structures .	Objecting	I endorse the suggestions and comments made by the National Trust for Jersey on these policies and proposals		Noted		The Minister notes the objection to this policy
DP943		Mr James Godfrey	Royal Jersey Agricultural & Horticultural Society	Policy ERE 6	New Agricultural Buildings, Extensions , And Horticultural	Objecting	Agricultural buildings: There is a need for the industry to be able to replace buildings as they become out dated. There is also a case to allow a temporary change of use for industry, although this must not be allowed to then lead to further applications relying on the 'need' for more facilities for agriculture on the grounds of insufficient space. The process by which change of use is granted is		Noted and further consideration required	Policy ERE6 provides conditional support for the replacement of agricultural buildings. Temporary change of use is also provided for under Policy ERE5. There comment that land owners are deliberately attempting to obscure availability or	The Minister notes the comments and with regard to the last point, it is worthy of further consideration

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					Structures .		not working and a more effective method of advertising availability of both land and buildings needs to be devised. There is evidence of land owners deliberately attempting to obscure availability or unrealistically pricing facilities to ensure that 'no interest is expressed' enabling them to secure a change of permitted use.			unrealistically pricing facilities to ensure that 'no interest is expressed' enabling them to secure a change of permitted use is a concern which needs to be given further consideration. It is perhaps worth considering on new development a planning obligation which requires the owner to remove and restore the land if the shed becomes redundant to agriculture.	
DP139		Mr Stephen de Gruchy		Policy ERE 7	Derelict and Redundant Glasshouses	Supporting			Noted		Noted by the Minister
DP428		John Le Maistre	Jersey Farmers Union	Policy ERE 7	Derelict and Redundant Glasshouses	Neither	It is felt that these sites should be used for housing development prior to any green field sites being used. We also believe that where possible some development on a redundant site should be allowed to provide funds and encouragement for the remainder of the site to be returned to 'green field'.		Rejected	Those glasshouse sites that are considered suitable for use as housing sites to contribute towards the island's needs for homes have been identified in the draft Plan at Policy H1. It is considered that the policy regime provided by draft Policy ERE7 enables consideration for the redevelopment of redundant and derelict glasshouse sites to secure demonstrable environmental gains in exceptional circumstances.	The Minister is not minded to amend the draft Plan
DP895		Mr Iain Norris		Policy ERE 7	Derelict and Redundant Glasshouses	Objecting	The following could also apply to agricultural buildings 5.156 Highlights the fact that owners have expectations that they can get planning permission for non agricultural development. Whilst this hope value exists we can get the following scenario. Farmer A wants change of use/housing permission (Hope value). Planning permission refused Farmer B wants to lease/buy from farmer A for agriculture/horticulture use Farmer A refuses and/or demands unrealistic rent/price Result = Impasse and unused glasshouse/agricultural building. Farmer B then applies for planning permission for new building when existing one already exists. Planning permission refused as existing glasshouse/agricultural building is already available . Question : To avoid this scenario should some form of compulsion (controversial) be introduced to force Farmer A to rent/sell to farmer B at realistic agricultural rate? If he refuses should there be a requirement to return the glasshouse/agricultural buildings to a green field as		Noted	The comment is noted and would clearly be controversial. It is not though that the current planning law allows the Minister to intervene in this way and would therefore require a change in the law which is outside of the Island Plan process.	The Minister notes the comment



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							they are now redundant (applied for change of use/planning permission)? This policy would remove the hope value if consistently applied or is there scope within the policy?				
DP912		mr daniel wimberley		Policy ERE 7	Derelict and Redundant Glasshouses	Supporting		Tough policies on redundant glasshouses as set out on page 223	Noted		Support is noted by the Minister
DP942		Mr James Godfrey	Royal Jersey Agricultural & Horticultural Society	Policy ERE 7	Derelict and Redundant Glasshouses	Supporting	Glasshouse sites: There is a case for some of the current redundant sites to be permitted for development although any change to 'brown field' should be accompanied by a block against future development of additional glass, the same principle should apply to modern farm buildings in general.		Noted	Those glasshouse sites that are considered suitable for use as housing sites to contribute towards the island's needs for homes have been identified in the draft Plan at Policy H1. It is considered that the policy regime provided by draft Policy ERE7 enables consideration for the redevelopment of redundant and derelict glasshouse sites to secure demonstrable environmental gains in exceptional circumstances.	The Minister notes the qualified support for this policy
DP140		Mr Stephen de Gruchy		Policy ERE 8	Fishing & Fish Farming	Supporting			Noted		Noted by the Minister
DP998		Captain Howard Le Cornu	States of Jersey Harbours	Policy ERE 8	Fishing & Fish Farming	Supporting		Should also be included and defined within Port Operational Area. This industry is important to the port and Island community and should be given the appropriate space and facilities it requires to develop	Noted	Policy ERE8 seeks to protect both the marine and land resources that form the basis of the fishing and fish farming industry, the nature and extent of which would be too extensive to list. Therefore the policy is written to catch all circumstances.	Support is noted by the Minister
DP1024		Ray Shead	The Jersey Chamber of Commerce		Visitor Economy	Supporting	There are some excellent comments in the Draft Island Plan with regard to the tourism industry(paragraph 5.159 et seq). It is a shame that these attributes are not documented or promoted elsewhere within the States. Paragraph 5.163 reflects a misuse of statistics in that arrival figures are not a reliable measure of tourism performance, and particularly noting that it was the States that offered financial "incentives" to certain airlines to fly here. In any event, the 2009 tourism statistics reflect a continued and relentless decline. The Draft Island Plan does not reflect or demonstrate any joined up thinking as regards any strategic plans of EDD, if there are any, for the development and growth of Jersey's tourism industry. Whilst generally supportive of the tourism industry, the Draft Island Plan generally says that "we will stick to		Comments noted	EDD have been very close to the draft plan and have endorsed the Visitor Economy section. The areas of St. Ouen and the North coast are sensitive areas and tourism development, or indeed any form of development, needs to be carefully considered within this context.	Noted by the Minister

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							what we have", and seems scared to think out of the box. It seems especially scared to explain what could be tackled in St. Ouen or in the north of the Island from a tourism viewpoint, or indeed from a view of residents.				
DP257		mr mike graham			Visitor Economy	Supporting	5.159 1. We must not be fooled that 90,000 people will keep local attractions (heritage, durrell) open. We need visitors. 5.160 1. Without tourism visitors it is inevitable that more major attractions will close. Living legend and Jersey pottery are next closely followed by Durrell and to a significant extend Heritage. Doesn't leave much. We need to bed numbers to firstly stop decling and then increase to keep what we love so dear. About half of staying visitors go to Durrell; so for every 2 we lose that's one less person making a visit. The numbers quickly add up. 2. Fewer air services and no fast ferries means the harbour and airport with significant high fixed costs will then need government support. Generally this section is spot on it that it recognises the link between tourism and the rest of the Island though more should be mentioned of the multiplier effect of tourism throughout our economy. If anything its how far government can go in protecting the tourism product or encouraging it. Bed numbers were down a further 3.3% in 2009. Whilst many hotel owners would be against protection of tourism accommodation from alternative use if this is not considered it may be inevitable that more hotels will move to residential so further reducing bed numbers and its linked effect on other aspects of our way of life.		Comments noted		Noted by the Minister
DP150		Mr Stephen de Gruchy		Objective EVE 1	Tourism Objectives	Supporting			Noted		Noted by the Minister
DP776		Seamus Morvan	Morvan Hotels	Objective EVE 1	Tourism Objectives	Objecting	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: 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: 2. Policy H3 - Affordable Homes - We understand that the aim is to provide lower cost homes and believe that this is expected to be achieved (as build costs are a constant), through the lowering of site values.		The comments of Morvan Hotels in respect of policy H3 are noted		Noted by the Minister

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							<p>Many hoteliers, naturally in the course of their business, rely on the underlying housing value of their site/s to raise funds to further invest in their businesses. If the effect of policy H3 is to reduce potential tourism site values, this will act as an impediment to raising investment into tourism businesses within the sector. The Past - The failed 'Prime Hotel Site Policy' clearly demonstrated the dangers of restricting or denying fluidity of change of use as the policy impacted the desirability to invest into the sector and thus impacted upon hotel freehold values. The industry largely stagnated. I understand that Planning Officers found the policy was highly problematic to manage and it led to a significant morale issue within the industry. Many hotel proprietors found themselves in the sad position that they could not plan for retirement as they had hoped and the desirability of their trade to the next generation was impacted. In effect, they were trapped into the occupation. Indeed, history clearly demonstrates that hotel investment only flourished when these controls were removed in c. 2001, when we witnessed unprecedented investment into new tourism product following the ending of the policy of Planning intervention. Industry performance issues - Of significant importance to the arguments above is the matter that Jersey currently only enjoys low hotel bed space occupancy. In effect, there is currently an excess of supply, with official figures showing only a 57% bed space occupancy January to November 2009. This low occupancy, together with resultant poor yield per bed sold, is having a detrimental effect upon the value of the industry to the Island whilst consuming the current land footprint. Occupancy and financial yield should be the measure of performance of the sector and not crude bed numbers. Artificially inflating bed numbers in the hope of generation of economic diversification would again be counterproductive to the motivation and flexibility of those involved within the industry and would not serve the island well. To succeed, there will be a need to promote both migration into the tourism sector and exit from the sector with regard to land use - these above highlighted proposals, in practice, do neither. To conclude- We believe that, particularly in the Jersey high cost based context, the above proposed policies of market intervention, whilst well intentioned and seemingly in keeping with States strategy policy, will not benefit the creation of enhanced tourism product or value, nor will it yield the homes to meet the objectives of the plan. We</p>				

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							believe that both or either of the above policies, if applied to tourism sites, would generate serious structural issues for our industry for the future, and that this would not be to the benefit of the people of the Island or for the tourism industry generally. In addition, given there is significant history of past detrimental government intervention in this area, we would ask whether these highlighted policies have been drawn-up in consultation with Economic Development, as this department has been market driven in recent times and has so witnessed considerable investment into the sector, including by my own family hotel company. I would be grateful if you would give us the opportunity to meet with the Inspector in order that we may ensure that these arguments, which we genuinely believe are to the betterment of the industry generally, may be explored further. I look forward to hearing from you.				
DP1026		Ray Shead	The Jersey Chamber of Commerce		EVE: Policies	Objecting	Paragraph 5.169 recognises that the quantity, range and quality of accommodation need to be addressed, but there is little, if anything, in the Draft Island Plan to indicate how this concern might be actually tackled.		Comment not fully relevant to Plan	The loss of accommodation has generally been in the lower quality sites and the remaining stock that is left is generally of a higher standard with significant investment being put into some of the best sites. Previous planning policies were adopted to resist the loss of tourist accommodation but this was strongly resisted by the industry and subsequently dropped. The marketing of the industry falls outside the auspices of the Plan.	Noted by Minister but minded not to amend Plan.
DP413		Mr Robin Troy			EVE: Policies	Objecting	In the 2002 Island Plan, policy TR6 designated specific areas for recreational purposes and the development of recreational resources. Policy TR5 sets out criteria for the development of recreational resources and policies TR2 and TR3 were included and are intended to encourage the development of new or extensions to existing tourism and cultural attractions within the built up area or the countryside zone and green zone. These policies have been omitted from the 2009 Draft Island Plan and although replaced by other policies, the concept of designated areas for recreational development is too important to be ignored and must be reinstated. Objecting to removal of 2002 policies TR2, TR3, TR5 & TR6 See attached letter	The 2009 Draft Island Plan should recognise that, in connection with sport, tourism, leisure and recreational facilities, these are often unsuitable for development in the urban area or are found in the coastal national park or green zone. The 2002 Island Plan included policies TR2, TR3, TR5 and TR6 which provided for the designation of tourism and recreational areas and policies for the development, improvement and enhancement of such facilities, which have been omitted from the 2009 Draft Island Plan and require immediate reinstatement both as concepts and policies, whether they relate to the green zone or coastal national park. In addition the Minister should have the power from time to time to create additional sites for recreational development. See attached letter	Do not agree with comments as these policies still exist in Plan	Policies TR6 & TR5 have been replaced in the Social, Community and Open Space section of the plan under policy numbers SCO4 (Protection of Open Space) & SC05 (Provision and Enhancement of Open Space) and Proposal 17 (Open Space Strategy). Policies TR2 & TR2 are replaced by policies EVE1 (visitor Accommodation, tourism and cultural attractions), EVE2 (Tourist Destination Areas) & EVE3 (Tourism Support Facilities in the Countryside).	Minister notes comment but omissions covered by replacement policies in different part of Plan
DP151		Mr Stephen de		Policy EVE 1	Visitor Accommodation,	Supporting			Noted		Noted by the Minister

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		Gruchy			Tourism and Cultural Attractions						
DP574		Deputy John Le Fondre		Policy EVE 1	Visitor Accommodation, Tourism and Cultural Attractions	Objecting	Tourism Accommodation etc - in the Green Zone tourism related construction is permitted for existing tourism facilities. In the Coastal Park there is a presumption against the extension of existing tourism accommodation. Therefore the only area in which one can attempt any new tourism facility is in the built up area. Although not always the case, it is likely that an attractive tourism offering is desirable outside of the urban area. This policy seems to severely restrict such activity, and therefore in my mind, does not support any diversification of the economy.		Comments noted - minded not to support	The Coastal National park is the Island's most sensitive landscape and it is right that new development should be resisted in this zone. However, although there is a presumption against the development and extension of tourism and cultural attractions, exceptions can be made where deemed acceptable by the Minister. The diversification of the economy can be ably supported by other policies in the Plan and in more suitable areas of the island where appropriate.	The Minister is not minded to amend the draft Plan
DP861		Gerald Fletcher	Jersey Hospitality Association	Policy EVE 1	Visitor Accommodation, Tourism and Cultural Attractions	Objecting	amended policy wording replace- permitted with supported	In the Policy NE 7 'Green Zone', extensions to existing tourist accommodation, the conversion of existing buildings or development of new tourism and cultural attractions will be strongly supported (permitted- deleted ), where the proposal is directly related to an existing tourism, leisure or recreation facility and satisfies Policy GD1 General Development Considerations. There is a presumption against new tourism development and the extension of existing tourism accommodation, attractions and cultural attractions in the Policy NE 6 'Coastal National Park'.	Noted but disagree with comment	It is for other departments such as EDD (Tourism) to support such facilities, where appropriate, the purpose of the Plan is to have policies that give clear guidance to applicants - it is not an enabling policy but rather a criteria based policy.	The Minister is not minded to amend the draft Plan
DP1025		Ray Shead	The Jersey Chamber of Commerce	Policy EVE 2	Tourist Destination Areas	Supporting	The town of St. Helier is increasingly becoming an unattractive place to visit and seems to be a continual building site. It is in this context that the Tourism Committee welcomes the recognition in the Draft Island Plan that other tourist destination areas in the Island need to be looked after.		Support Noted		Support is noted by the Minister
DP152		Mr Stephen de Gruchy		Policy EVE 2	Tourist Destination Areas	Supporting			Noted		Noted by the Minister
DP575		Deputy John Le Fondre		Policy EVE 2	Tourist Destination Areas	Neither	Tourism Destination Areas - as noted above certain sites such as Le Braye, El Tico, Watersplash have previously been designated as sites warranting investment. I believe there are some other locations around the island which could also warrant investment but which will now be located in the Coastal Park. Would it be possible to give consideration to specifically identifying such locations (for example the 3 sites above, perhaps St		Reject	The policy is flexible enough to allow for sympathetic re-development of such sites, provided that they meet with other policies in the plan, including GD1 and NE6. It is important that a balance is achieved between supporting tourism facilities whilst	Comments noted but minded not to support amended policy suggestion.



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							Catheine's café), etc, as sites (tourism related sites ?) which may be given some greater flexibility in the interpretation of policy NE 6. For example, provided there is support from EDD, the proposals are of good design, etc. Otherwise such facilities will over time just stagnate.			protecting Jersey's, and ultimately the tourism industry's, most precious asset	
DP862		Gerald Fletcher	Jersey Hospitality Association	Policy EVE 2	Tourist Destination Areas	Neither	amended policy wording replace- permitted with supported	In relation to Policy EVE 2, which relates to Tourist Destination Areas, it is recommended that the text is amended, as shown below in red, to provide overt support to appropriate development, in order to better reflect the overall aims of the Plan: 'Within the Tourist Destination Areas designated on the Proposals Map, the Minister will strongly support: environmental enhancements to the public realm; proposals for al fresco activities associated with restaurants, bars, cafes and outdoor performances; and improvements in accessibility for pedestrians, cyclists and public transport users Proposals for new tourist accommodation and support facilities will be strongly supported (permitted) in the Tourist Destination Areas provided that the development accords with Policy Policy GO 1'General Development Considerations'	Noted but disagree with comment	It is for other departments such as EDD (Tourism) to support such facilities, where appropriate, the purpose of the Plan is to have policies that give clear guidance to applicants - it is not an enabling policy but rather a criteria based policy.	The Minister is not minded to amend the draft Plan
DP153		Mr Stephen de Gruchy		Policy EVE 3	Tourism Support Facilities in the Countryside	Supporting			Noted		Support is noted by the Minister
DP346		Mrs Penelope Lee		Policy EVE 3	Tourism Support Facilities in the Countryside	Supporting			Support noted		Support is noted by the Minister
DP576		Deputy John Le Fondre		Policy EVE 3	Tourism Support Facilities in the Countryside	Neither	Tourism Support Facilities - general presumption against provision of tourism and recreational support facilities in the Coastal Park Zone. This is extremely proscriptive, and did not, to my recollection, form part of the consultation sessions. However, if this is to prevent new facilities on green field sites then is probably acceptable. If it is to slowly whittle down existing facilities - e.g. St Catherine's café, this does not seem equitable and could severely damage our tourism offering. For example, if St Catherine's café, which is (rightly) included in the zone, were to want to redevelop its present building, would this policy permit it ? Strictly speaking this does not seem to be the case, and I would urge there to be some degree of flexibility built in to this policy.		Noted	The purpose of this policy is not to 'whittle down' existing facilities in the most sensitive areas of the Island and is flexible to allow for the re-development of existing facilities provided that this is done in a sensitive way that does not cause harm or indeed enhances what is already there. There would however be a presumption against the development of brand new facilities in the coastal national park.	Noted by Minister but policy is flexible to allow for the re-development of exiting facilities and not too prescriptive.
DP601		Mr Paul		Policy	Tourism	Objecting	Picnic parks should be developed wherever possible		Noted	Policy EVE3 already enables the	The Minister is

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		Le Claire		EVE 3	Support Facilities in the Countrysi de		to allow for use of countryside by islanders			provision of support facilities in the countryside, which would include picnic parks, appropriate to the character of the area. Dependent upon their nature and scale, the provision of limited facilities may also be permitted in the Coastal National Park under the auspices of Polices NE6 and NE8.	not minded to amend the draft Plan as the matter is already enabled by proposed polices
DP863		Gerald Fletcher	Jersey Hospitality Association	Policy EVE 3	Tourism Support Facilities in the Countrysi de	Neither	amended policy wording replace- permitted with supported	In relation to Policy EVE 3, which relates to Tourism Support Facilities in the Countryside, it is recommended that the text is amended, as shown in red, to provide overt support to appropriate development, in order to better reflect the overall aims of the Plan: 'Proposals for tourism or support facilities including public conveniences, cafes and kiosks will be strongly supported (permitted) where the proposal promotes informal recreational activities appropriate to the sensitivity of the countryside and accords with Policy GO 1'General Development Considerations' There will be a general presumption against the provision of tourism and recreation support facilities in the Policy NE 6 'Coastal National Park' except for minor improvements to enhance public enjoyment of the coast and countryside', which will be supported.	Noted but disagree with comment .	It is for other departments such as EDD (Tourism) to support such facilities, where appropriate, the purpose of the Plan is to have policies that give clear guidance to applicants - it is not an enabling policy but rather a criteria based policy.	The Minister is not minded to amend the draft Plan
DP154		Mr Stephen de Gruchy		Policy EVE 4	Beach Kiosks	Supporting			Noted		Noted by the Minister

## Housing

DP12		Miss Lynda Firkins		6	Housing	Neither	I am now 44 years of age and have lived and worked in Jersey for 25years and still unable to afford a home. I have never in that time not worked and always earned my own money and even now having my own place to call home is unreachable. Earning £30,000 a year and lending 5 times my wage only comes to £150,000 all that is on offer are studio's for even more than £150,000. I lived in one room for 18yrs before I got my qualifications and so refuse to do so again. Why is my only option and awful spectrum apartment in town or small studio, can housing not build affordable places outside of town with outside areas to relax in after a hard days work, we do not all want to live in St.Helier but it is the only place we are getting squeezed into. A great example of architecture, thought and price was the Palms at Portelet and nice out of town location, roomy apartments with a small decked	Nicer affordable developments for single mature caring adults need to be considered, we are part of the life blood of this island the working class and shortly we are all entitled to have a place to call home. I even missed out on children because every place I have rented stipulated no children, no pets, no smoking etc. I have 4 sets of friends where the woman and child have moved to the U.K to place the child into nursery as they can't afford to do it here and the guy's have stayed on here to work and they just visit each other as and when, what type of society splits up families in this way and causes woman not to have children because they can't afford to keep themselves and the child. It really is a frustrating situation and not good for our future generations	Noted		Noted by the Minister
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							area and start off prices of £170,000. All new housing outside of St.Helier seems to be luxury?				
DP240		Dr Luke Shobbrook		6	Housing	Neither	<p>We would like to take the opportunity to input into the Island Plan consultation. The Island Plan cannot be seen in isolation. It has been encouraging to see the debate on housing stimulated by Scrutiny. It is a major policy area where relentless free market economics impacts significantly on quality of life in a small island community. It appears that current population control and housing regulation are struggling to deal with the tension between the two. We have both worked at the sharp end of an increasingly deregulated and private ownership orientated housing system in the UK. General policies there have allowed the unprecedented transfer of wealth from the young to older property owners thanks to soaring house prices. Our experience has taught us that adequate housing is not only a fundamental human right, it also impacts on mental health, the strength and permanence of communities, quality of life, child development and a basic human need to belong. It is too important to be left to the unregulated free market. A well intentioned policy of increasing the housing supply in Jersey has in our experience translated into developments of mixed quality flats, often with little regard for families and the community needs of those living in them. Poor soundproofing is a big issue with Health Protection and building standards too weak to deal with the issue. The recent house price index indicated that two bed flats have stabilized in value overall, further increasing the relative price of family houses and effectively trapping some families in unsuitable accommodation. We would like to suggest an alternative that puts control of development firmly in the hands of the local community and the States elected to serve them, away from property development companies legally obliged to maximise profit for their shareholders. The idea also works to minimise the environmental impact of increasing population. The Island Plan could allow for the rezoning of land (brownfield sites) in small pockets throughout the parishes exclusively for sustainable, self build development by local individuals and families with parish links. Food security is an increasing issue and the presumption must be that green field agricultural land must not be developed as seems to be acknowledged (even for 'horse stabling' which has appeared like a rash in St Martins and often lies unused presumably waiting to take advantage of planning creep). Rezoned brownfield sites could be sold only to the</p>		Comments noted	<p>The Housing in Rural Centres is aimed at achieving many of the points raised in the comments above, in particular housing sites developed by the local communities to maintain local vitality.</p>	Noted by the Minister

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							States or Parish at market price and then sold on to those individuals and families with the requirement that any development meet strict sustainability criteria and be achieved through close collaboration with the Planning and Building control departments, local trade's people and architects. Low cost approaches to sustainable development include passive solar gain, car sharing, grey water recycling and low embodied energy insulation. These small, human scale developments would incorporate two bed roomed cottages and three or four bed roomed family homes. They would be environmentally sensitive and sustainable in terms of water and energy use. They could be used to educate and inspire other environmentally sensitive building projects. These developments would also provide for families, older and young people who want to live in mixed communities not enclaves. In return for local sustainable building expertise co-opted by the States and States bulk purchasing power a sliding scale shared equity arrangement could be put in place, the amount of equity held by the States decreasing incrementally over time. The element of shared equity will help to encourage commitment to a community or provide funds to invest in housing provision for people who need help. Consideration needs to be given to mechanisms to ensure that family housing stock is not lost as will happen with right to buy. These could include selling on to first time house buyers only. A crucial element of the idea is that it would allow people to choose to be time rich but still be able to house themselves independently. They will not have to spend their time working to service a huge mortgage or rent liability but instead can invest their time in developing a home they can love living in that minimises resource use and carbon production and becomes an ongoing community resource. Happiness research, summarized by the economist Richard Layard in his recent book 'Happiness: Lessons from a New Science' (2005), has shown that sacrificing the majority of your time to accumulate more wealth after basic needs are met does not significantly increase happiness. This is different to wanting to progress and develop in work you love where motivation is intrinsic and the financial reward is often not as great. A desperately important part of giving families more choice in how to spend their time is the impact on the care of children. Recent reports show that women in Jersey often have to delay motherhood until their late 30s, past the optimum time. When the baby arrives there is often				

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							financial or contractual pressure on both parents to return to work as soon as possible. Investing time in children is beyond price. Research has shown that a quality one on one bond during the first three years of life has a profound effect on an infant's brain development and emotional well being that persists into adulthood. Poor quality, inconsistent care can severely impair development and leave the worst affected in a permanent state of anxiety and stress. This research is covered in detail in by S. Gerhardt in 'Why Love matters' (2004) ' the kind of brain that each baby develops is the brain that comes out of his or her particular experiences with people'p42 . This has huge implications for future social policy. Housing and planning policy has a fundamental part to play in happiness now and in the future.				
DP348		Mr Martin Whitley		6	Housing	Neither	The document should recognise development in progress.	It would seem inadvisable to agree policy and proposal for change in the middle of development that could have been adapted to match the new plan. The development of Field 605, St John is likely to be built at about the time the new island plan introduces common sense to development. Surely it would make sense to suspend major developments during the consultation period.	Noted	All planning applications are judged against the policies of the day and once approved, revised policies such as those contained in this plan, cannot be applied retrospectively, unless a substantial revision or change in the application is needed to be made through a new application.	Noted by the Minister
DP395		Vallois		6	Housing	Neither	To add in to H1 the area of Anne Court as per proposition agreed by the states from Deputy Martin with regards to Social Housing for that site therefore a designated area of Category A housing.		Reject	Ann Court is within States ownership and is the subject of development proposals as part of the North of Town Masterplan: there is thus no requirement to rezone the land for Category A housing as this will be material to the North of Town Masterplan.	The Minister is not minded to amend the draft Plan as the issue raised is already adequately addressed
DP396		Vallois		6	Housing	Objecting	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	Minister minded to support request to remove site from Plan.



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										<p>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 &amp; 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>	
DP662		Conneta ble Peter Hanning	Parish of St Saviour	6	Housing	Objecting	<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 JMMB 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</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</p>	Minister minded to support request to remove site from Plan.

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							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 and I earnestly hope you will honour that assurance in this particular case. As I have said, we have already contributed greatly over recent years in additional housing stock and there will still be further pocket re-developments that will continue to augment the supply chain. Given that certain Connetables in rural Parishes have expressed a desire to expand their village communities to encourage more vibrancy and first time buyer potential, I would say that, in the event, such aspirations would most certainly lessen the strain on the pressure points in this Parish. The 'built environment' must be supported by a sound infrastructure. It cannot, by any means, be said that this is the case in St. Saviour. I would hope therefore that this will be recognised and addressed in the 2009 Island Plan Review in order to safeguard the environmental and infrastructural well being of this Parish			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.	
DP680		Mrs Sue Lissenden		6	Housing	Neither	Housing. Here I change gear and bring in some personal experience. We have to down-size after 43 years in one place. We have taken a year to look around available houses on the island. As a result we have seen for ourselves the huge amount of housing development since we first came to the island. At the same time, because the market is sluggish, there are very many houses static on the market. This mismatch cries out for some sort of re-think, though I cannot see the answer. That is not surprising and it does not mean there is no answer to be found. May I suggest a pause in the building programme, an inventory of both need and supply a cross the whole range, and a complete re-think? The need to keep the construction industry happy has been a sudden imperative in island thinking; is it valid? Everything, except hard-and-fast trade union thought, is changing fast. This is where those two sisters Prudence and Patience should be consulted.		Noted	There is clear evidence of need for the provision of affordable homes over the Plan period and also evidence of need for specific types of housing accommodation and it is incumbent upon the Minister for Planning and Environment to ensure a provision of land and buildings to meet this demand, particularly when it will be some time before any homes to be procured under the auspices of the new Plan are developed and completed.	The Minister notes the comments made but is not minded to amend the draft Plan
DP683		Pauline Harewood		6	Housing	Objecting	We should under no circumstances build on green agricultural fields - or even undermine wild green areas with housing - or on greenhouse sites as this is still good agricultural land - even if it is uneconomical to heat these greenhouses alternative crops should be grown	To save our countryside and rural aspect both for locals and visitors.	Noted		Noted by the Minister
DP745		Paul Harding	The Association of Jersey	6	Housing	Objecting	10.1 The 2009 Draft Plan recognises the Plan is unlikely to make proper provision for Islanders housing needs, warning in para 4.10 (bold type as used in the Plan) that " It needs to be clearly		comments noted	The concentration of new development into existing built up areas and the protection of the countryside is a key	Noted by the Minister

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			Architects				<p>recognised, however, that unless land in the Built up Area is developed at higher and more land efficient densities than have previously been achieved, in accordance with the strategic policies of the Plan (Policy SP 2 'Efficient Use of Resources'), it will not be possible to meet all the Island's identified needs, particularly for housing, without reviewing the need to release greenfield sites for development during the Plan period. " This indicates the density of development within Built-Up areas will have to dramatically increase to satisfy the Plan policies, overcoming other policies within the 2009 Draft Island Plan such as building height, Green Backdrop and skyline. 10.2 The concentration and intensification of all development within St Helier risks further polarising serious social divides (the have's in country houses with have not's in dense urban areas) and causing harmful damage denying our younger locals the opportunity of ever owning their own home. This approach was tried out in the 1960's with the urban high-rise developments, resulting in social problems. 10.3 There are glyph maps incorporated into the 2009 Draft Plan for virtually all demarcated zones / areas, except one delineating the proposed Built-Up area extent. This is contained within the stakeholders presentation and the lessons we learn from it are so important we reproduce it (by permission from Planning and Environment Department) herein:?</p> <p>10.4 It is apparent, although the principal Built-Up areas within the Island extend across large parts of the south coast, they actually form a small proportion of the Island's land extent. By a large margin Jersey substantially retains its countryside and green, natural spaces. It is also equally apparent the Built-Up area is quite fragmented in places and in other locations rather irrational. 10.5 Although regenerating St Helier is an admirable objective it cannot be the only answer to stack up the housing in Town with increased density. This is not the answer to every built requirement. We know young Jersey persons aspire to a conventional home with garden and if this cannot be achieved on the Island they are prepared to leave Jersey for other shores. This is undoubtedly not good for our future. 9.6 In its current guise the policies concentrating and intensifying development in St Helier is too dogmatic. It risks creating a whole new set of demographic and sociological problems. We need to look harder at edges of the Built-Up area and brown-field sites. There has to be a more balanced approach. 10.7 The AJA submits there is potential for a Multi-Centric approach to the Built-</p>			<p>component of the new draft plan and one that should not be watered down, unless through the monitoring regime proposed there is evidence that the policies are failing to provide the housing and other land use requirements identified in the Plan.</p>	

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							Up Area, where distinct neighbourhoods are identified (within St Helier and elsewhere within the Built-Up Areas) and contain: a) Distinct neighbourhoods within the Built-Up areas are identified. b) Each would be 10/15 minutes walk in any direction, to give an accessible size on foot. c) Each would have at least one public Open Space. d) All will be connected with public transport links. e) Each will have a viable mix of uses including shops, offices, other employment uses and housing. f) Adequate public / private transport and parking provision including car-share and bicycles. g) Strategy for enhancing public realm space and character qualities. 10.8 We propose that serious consideration need to be given to : a) Rationalising the Built-Up area boundaries, and b) Consolidating the Built-Up area boundaries, and c) The benefits of appropriate reclamation. It is Jersey's tradition to reclaim land for our built environment requirements. 10.10 All this could be achieved without adversely impacting on our countryside or shoreline. Jersey's heartland countryside, green and natural spaces must be conserved and enhanced at all costs. The AJA believes the balance of Built-Up area and Green Zone needs reworking.				
DP155		Mr Stephen de Gruchy			H: Introduction	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
DP791		Senator Terry Le Main	States of Jersey Housing Department		H: Introduction	Neither	Evidential Basis On a general point, the plan relies heavily on the findings of the 2007 Housing Needs Survey. That survey did not measure actual need or even what is reasonably achievable given an individual's financial means and the results must be treated with caution and not relied on as solely demonstrating the Housing needs of our population. It is also worth keeping in mind that the survey which was carried out late in 2007 pre-dates the current economic difficulties which have doubtless altered the realistic purchasing potential of many aspiring buyers. For others, particularly those renting in the private sector there may be a greater motivation now to look to the social rented sector for a better housing deal. This is a very important point and one which has significant relevance for the Plan, as drafted, in its approach to Category A Housing. Our population is changing in other ways; we are of course, as is now well established, getting older, but also as an Island we have a significant reliance on 'Key Workers' migrating to the Island to provide those services vital to our continued success. No more important		The Housing Minister's comments are noted.	The plan recognises these points. Currently the 2007 is the only statistically reliable source of evidence. Recent discussions with Duncan Gibaut from the States Statistics Office, confirms that the overall demand numbers are still relevant and with regard to need housing, even more so, given the current economic climate.	Noted by the Minister

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							is this than in our Health Service where issues of access to accommodation and relative affordability are having a significant impact on the recruitment and retention of nursing staff.				
DP156		Mr Stephen de Gruchy		Objective H 1	Housing Objectives	Supporting			support noted		Support is noted by the Minister
DP347		Mrs Penelope Lee		Objective H 1	Housing Objectives	Objecting	Currently there seems to be an oversupply of new property, both cheaper flats to expensive houses. Perhaps there could be a study of why these are not selling before building yet more		The current build rates on average are equitable to past rates and trends. The supply of homes has been estimated to match the estimated demand over the plan period. The supply of homes is not an instant on or off switch as it takes time to plan and build new homes. Therefore , although this Consultee perceives there to be a current over supply, (which		Noted by the Minister



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									could be down to the present financial difficulties caused by the Banks restricting lending to prospective purchasers), the demand levels will balance this supply over time.		
DP1056		Ray Shead	The Jersey Chamber of Commerce	Indicators H 1	Housing Indicators	Objecting	The quality of environmental impact should be a fundamental part of the process. Some key sustainability parameters should be set.		Noted		Noted by the Minister
DP1009		Mr John Mesch	Council for the Protection of Jersey's Heritage		Demand for Homes	Objecting	In the section on housing individual members of the Council have expressed concerns about the reliability of the figures used in predicting housing needs. The draft plan states at paragraph 6.25 that the findings of a survey based on the aspirations of the individuals done in 2007 "are still robust". The requirements for social housing should be based on an assessment of real need, not the unbounded aspiration of a small population sample. To illustrate this point, it has never been explained why predicted figures of social sheltered housing needs include 57 people who will still be under the present normal retirement age in more than ten years time, outside the stated planning period		A large sample of over 10,150 private households (including all States tenants) was randomly selected. Within this sample there were a number of ineligible addresses (e.g. businesses or		Noted by the Minister

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									unoccupied dwellings) meaning the total number of eligible addresses was 10,000. Of these eligible addresses some households refused or were unable to complete the survey. A total of 5,548 private households completed this voluntary postal survey, giving an overall excellent response rate of 56% and thereby providing a large and robust set of data for analysis.		
DP1185		Valerie Harding			Demand for Homes	Objecting	The plan sets out the need for 4000 new housing units in the island over the next ten years. Firstly this figure is estimated and perhaps further information should be given to the public as to how this was reached. Who is going to live/buy 4000 units of housing? The figure makes no sense - Jersey is only 45 square miles. Paragraph 6.20 mentions		Reject	Population model: the Statistics Unit have used a population model, to provide estimates of the population and estimates of housing. This is set out in the draft Plan at 6.18-6.23. Housing aspirations: the Housing Needs	The Minister notes the comments made but is not minded to amend the draft Plan as the issues raised are

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							fertility and morbidity (the latter means diseased; sickly - are we going to have a plague? Surely it should read mortality (frequency or number of deaths). Allowing for immigration of 150 per year that is only 1150 individuals over ten years and if each has a new housing unit then there is only a need for 1150 (the size of the individuals family is irrelevant for the purposes of estimating the number of units needed, the size of the family is relevant to the size of the unit i.e. two children three bed roomed unit etc) . This is partly covered in 6.21. 6.26 mentions 1000 households have housing aspirations. We all have housing aspirations but if you cannot afford it you do not buy it . People who have aspirations in life usual work hard and earn to achieve their aspirations or part thereof . The type of housing going to be developed are not mansions. Families living in States rented accommodation whose income is above the threshold would have moved by now if they were "aspired" to do so. They are probably happy living where they do. Social housing is usually built to an inferior quality and standard - another UK development idea - smaller rooms i.e. rabbit hutches. 6.91 says "information on the numbers of households who are in need of affordable housing is not clear" so why all the rush to build 4000 units over 10 years.			Survey sought to take into account the extent to which people's housing aspirations were realistic.	adequately addressed
DP394		Vallois			Demand for Homes	Objecting	To assess the real underlying issues of housing demand and affordability and identify how planning policies increase price of property within a small infrastructure such as Jersey	Over many years in Jersey there has always been an apparent necessity to enable more people to purchase homes within the Island however, never addressing the real concerns and issues that economic activity has on the already resident population especially over the last 5 year period. Just by setting up new schemes every 5 / 10 years will not tackle the head on problem the Island are facing with respect to home owning aspirations. 6.14 states the difference between category A and category B housing needs however, on page 235 of the plan it states that Cat A (which is for over 55's) a requirement of only 550 and Category B would be 2000. How is this addressing the strategic plan policy of the ageing population?	Comments noted Cat A housing however consists of not just over 55's housing but rather: States, Parish and Housing Trust rental housing (which can include sheltered housing); lifelong		Noted by the Minister

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									homes (for people over 55) on sites specifically zoned for this purpose; homes for first time buyers; 'Jersey Homebuy' housing, which is housing sold at a discounted price and allocated through the Affordable Housing Gateway based on a financial means test. The total estimated requirement as evidenced through need is a total of 1000 CAT A homes over the Plan period. homes, which is 25% of the proposed new housing supply.		
DP577		Deputy			Demand	Neither	Housing - Categories and affordability - the statistics		Noted	The cost of home ownership is	Noted by the

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		John Le Fondre			for Homes		quoted in the draft plan as to affordability of housing are unsurprising but equally quite shocking. A FTB house of £450k - £500k cannot be sustainable. I am also unclear as to whether Homebuy as presently constituted 'locks' people into that type of accommodation with little prospect of being able to move up the property ladder. That may well not be an immediate concern, however might be a longer term consideration. Equally, the designation of sheltered accommodation (e.g. for 'over 55's) does raise medium term considerations as to how it can be controlled, 2 or 3 owners from now. If someone dies and leaves their home to their children (or grandchildren) are we seriously stating that someone younger than 55 cannot stay in them ? In addition I continue to believe that we do still construct the wrong type of accommodation. The point was made many years ago in the Housing Forum that other jurisdictions had better mixes of accommodation. We used to have (and I believe still do have) too many studio and one bedroom units. Sheltered housing is now moving towards "1 ½" bedroom units. This does not lend itself to future medium term flexibility in the use of accommodation. If an elderly couple has 2 bedroom accommodation it means they can have grandchildren to stay, a carer to stay, more incentive to downsize to such a unit, the ability to sleep apart if one or other is ill etc. When they eventually die, a 2 bedroom unit is of much more use (particularly if well designed, with good amenity space) to other potential users (e.g. young couple with first child), or to other types of family units. Yet we persist in allowing one bedroom accommodation to be constructed, which is surely an inefficient use of our valuable land.			indeed shocking and hence the development of policies aimed at providing more affordable homes through Jersey home buy for example. Both Jersey Home Buy and over 55's accommodation can only be sold to new owners who qualify for those categories in order to maintain this stock of housing. The new housing mix policy (H5) is aimed at delivering a more relevant mix of housing to the market, based upon needs.	Minister
DP781		Senator Terry Le Main	States of Jersey Housing Department		Demand for Homes	Neither	Category A - Need Housing Paragraph 6.14 There is evidence of a growing problem with the housing of key workers particularly at Health where there has been a significant shift in the housing needs of migrant nursing staff. This should perhaps be referenced here. Paragraph 6.17 This raises the question of the base data on which we make many of our planning and land use assumptions. In that respect it is of concern that we have less than optimal data on the size and make up of our population. We have had the benefit of a number of proportional Housing Needs Surveys which have been useful in estimating housing aspirations, they have though done little to define 'actual need'. An Island-Wide census, presently planned for 2011 is an essential step in defining the base line data		The comments of the Housing Minister are noted	6.14 This has emerged since the completion of the draft plan and will be updated to reflect the change in circumstances 6.17 the new census in 2011 and the formation of the gateway are essential components to having a fuller and more up to date understanding of housing needs. 6.32 noted	Noted by the Minister



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							necessary for long term robust land use policy. Beyond that it is the Affordable Housing Gateway which will need to be the single access point for all affordable housing applications, whether they are applications for States social housing, Jersey Homebuy, Housing Trust homes or Parish provided social housing. This gateway has been promoted by the Housing Department and set as a key activity under Aim 14 of the new States Strategic Plan. The gateway will bring together the application, means testing and waiting list processes from all of the disparate social housing providers. In this way there would at least be consistency across the piece regarding who can access social housing and could ensure that existing and future stock is targeted to deliver maximum benefit. As the gateway would be the single access point for all affordable housing (affordable housing to buy as well as to rent) there would be an up to date list of those requiring affordable housing, their circumstances and financial means that would allow planners and policy makers access to good robust data. For a jurisdiction such as ours this is a real prize. Paragraphs 6.32 - 6.36 We still have Category A sites from the 2002 Island Plan which have not been developed. That cannot be acceptable when they were by definition approved for Category A use in order to meet the needs of the population. This trend of delays in delivering Category A homes on approved sites has continued with significant delays being experienced in the delivery of the vast majority of the 300 homes on the sites approved with P75.2008. Work has only commenced on 2 very small Parish sites. Whilst I know that proposals are now coming forward for some of the other sites, we are approaching 2 years on since zoning and it will be almost another 2 years before we will see any significant number of homes.				
DP1011		Mr John Mesch	Council for the Protection of Jersey's Heritage		Supply of Homes	Objecting	12. The relentless release of agricultural land to new residential development is a constant source of great concern to the Council. The Council is disappointed that a previous recommendation of ours that a policy of relocating industrial sites to the new La Collette reclamation area has not received the consideration we believe it deserves. If industrial sites such as the Rue des Pres Trading Estate and Norman's site at Five Oaks were relocated to the harbour area not only would land be released for residential development in areas well served by roads, shops, bus routes and other public facilities but polluting and road damaging heavy lorry traffic through surrounding built up areas would be greatly reduced. This		Reject	There are very strong policies in this (NE5 (green zone), NE6 (Coastal National Park) ERE1 (Safeguarding Agricultural Land) and previous plans that seek to protect agricultural fields from development. There is not enough space or capacity to move all of the industrial sites identified by the Consultee to La Collette. In addition, the development of La Collette will be restricted by the findings of the Buncefield report which limits the development potential.	The Minister is not minded to amend the draft Plan

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							recommendation is in complete accordance with the draft Spatial Strategies SP 1 and SP 2..				
DP918		mr daniel wimberley			Supply of Homes	Neither		The Esplanade Quarter is still presented as a possibility, no, as a certainty or assumption. The Plan clearly should spell out its potential as a Housing site, or at the least make clear that there is a Plan B if the Esplanade Quarter does not proceed as 600,000 square feet of offices etc. as planned	The current approved master plan for esplanade quarter is predominantly for office accommodation with some residential units. A 'Plan B' is something that cannot be relied upon for purposes of estimating future housing supply at this time.		Noted by the Minister
DP578		Deputy John Le Fondre		Table 6.2	Supply of Homes 2009-18	Neither	Housing Stock Refurbishment - the plan talks about making better use of land, increased densities etc. Yet this part talks about a net reduction of 300 homes due to refurbishment of stock. Surely these sites should be reviewed independently to assess whether better use could be made of the land, perhaps by going higher or by a more efficient utilisation of the land? I am certainly aware of a couple of schemes where (in my view - as a layman) it would seem possible and desirable to increase the density being applied to the site.		Deputy le Fondre's comments are noted.	The reduction in numbers is primarily due to the Housing Department's proposals to merge substandard bedsits and 1 bedroom flats to provide better quality 1 and 2 bedroom flats	Noted by the Minister
DP579		Deputy John Le Fondre			Provision of Homes	Neither	Provision of Homes - the previous plan introduced the concept of the 45 / 55 split between (initially) social rented . FTB accommodation. My understanding is that these draft proposals include various variations on possible percentage splits. These need to be very carefully assessed. Even with a 45 / 55 split the sheer cost of producing social rented accommodation does challenge the viability of schemes at times. If this viability is further challenged the impact upon schemes may mean they just will not be constructed. This therefore		Comments noted	The requirement for social rental accommodation is one that has only emerged since the release of the draft plan and on-going discussions are taking place with the Housing Department to bottom out the requirements as part of the evidence base.	Noted by the Minister

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							needs careful appraisal, possibly in conjunction with Property Holdings who can give an objective assessment of the impact upon the viability of particular schemes. As regards social rented accommodation, it is unclear from the Whitehead report (commissioned by the Housing Department) as to what the present requirement is. That report expressly states that there must be concern about [an existing] policy that envisages a decline in the scale of the social sector and increasing emphasis on the provision of accommodation for older households. [Page 20 - summary of main report]. It also notes that various pieces of data are required to properly understand the market etc. Accordingly I believe that there is likely to be a requirement for good quality rental accommodation (both social and otherwise), and that this may need to be factored into the draft proposals.				
DP782		Senator Terry Le Main	States of Jersey Housing Department		Provision of Homes	Objecting	Affordable Housing Paragraph 6.64 The Island Plan 2002 was very successful in delivering affordable housing. The 45:55 arrangement that it introduced worked so well primarily because it focused on green field sites where the switch to residential (even Category A) use led to a material increase in land values. This made the requirement to produce generally 45% of the homes for social rented and the remainder restricted to first time buyers palatable for both developers and owners alike. Evidence of this is in the very small number of those sites still left undeveloped. The new proposals are for 40% of homes on sites over 6 units to be affordable. Where this will apply to Green fields I do think that it is over generous as it represents a backward step from the 45% achieved hitherto. I would suggest that the ratio's be reversed for Green Field sites and 55% of the homes made affordable (either social rented, Jersey Homebuy or life-long homes or most likely a combination of the three) and 45% for first time buyers. Where I have real concerns for the affordable housing proposals is in respect of its application on brown field sites. Such land has an intrinsically higher value leaving developers much smaller margin for profit. I am concerned that maintaining the requirement at the suggested level will lead to sites not being developed because they are not financially viable and we will miss out on valuable opportunities for the regeneration of our existing urban centres, principally in St Helier. The policy adopted as drafted could see:- 1. Urban site values reducing, this would affect sites in States ownership too 2. A lack of financial viability could restrict developments 3. Development process		The Housing Minister's comments are noted	The plan allows for a viability assessment to be undertaken ensuring that the proportion of affordable housing delivered within the target figure does not render a development unviable.	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.

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							could slow whilst complex financial modelling and negotiations take place on the viability of sites and the levels of commuted payments to be made if that is applicable 4. An increased administrative burden on the Planning Department or others together with increased costs at a time when our Public sector is under pressure to reduce its costs and staffing levels.				
DP1057		Ray Shead	The Jersey Chamber of Commerce	Proposal 16	Provision of Homes	Neither	The release of land and density of development is essential to maintain Jersey's image and retain its rural/urban identity.		Support		Noted by the Minister
DP158		Mr Stephen de Gruchy		Proposal 16	Provision of Homes	Supporting					Noted by the Minister
DP783		Senator Terry Le Main	States of Jersey Housing Department	Proposal 16	Provision of Homes	Objecting	Proposal 16 The estimate of new Category A homes to be provided over the plan period seems to be inadequate on two fronts. 1. It assumes that all of the outstanding approved sites will be developed and as we already know there are still H2 sites which have not been brought forward and development of other approved sites is worryingly slow. 2. It does not take account of the inadequacies of significant proportions of the existing Category A stock, particularly in the social housing sector where significant proportions of the accommodation, which on size alone appear to meet the needs of older persons fail to do so because of issues such as access.		The comments of the Housing Minister are noted	1. Noted 2. The re-development of existing stock is included in the 300 outworn housing sites figure in table 6.2	Noted by the Minister
DP421		Mr Marc Burton	Institute of Directors		Meeting Housing Needs	Neither	Further consideration needs to be given to defining other sites on the perimeter of St. Helier and, as we have said previously, in the country parishes. See attached letter	The plan almost assumes current and future generations require flats to live in but in reality we all aspire to have a house, garden and parking for cars with good areas for children. European style living may not suit everyone in Jersey and consideration must be given to 'families' by providing alternative development opportunities. Without the influx of young families into the country parishes, country areas may lose amenities and services and country schools may be at risk. In addition, the provision of a range of housing will be required to suit the economy and attract educated and skilled workers we will require in the future;	The comments are noted	The strategy for providing new homes is that they should be built within the Island's already built up areas. The designation of green field sites around St helier, specifically for affordable housing, has been kept to a minimum. The proposed designated sites are intended to deliver affordable housing in the short term, before Policy H3 becomes fully effective.	the Minister will only consider additional sites if the proposed sites are not designated for affordable housing.
DP545		Mr Paul Harding	The Association of Jersey Architects		Meeting Housing Needs	Objecting	Previous Island Plans have proposed specific Green Zone sites for rezoning, resulting with arguments about countryside erosion and value. This has been a 'pepper?pot' approach to providing our built area requirements, relying on accuracy of forecasts and anticipated site yields. As soon as land is proposed for rezoning it's value shoots skywards increasing	All this could be achieved without adversely impacting on our countryside or shoreline. Jersey's heartland countryside, green and natural spaces must be conserved and enhanced at all costs. The AJA believes the balance of Built-Up area and Green Zone needs reworking.	Noted	This strategy is along the same lines as the Policies H3 & H4 in the 2002 plan, which identified sites for future category A housing. This was dropped for the current plan as it still leads to hope value being placed on sites	The Minister is not minded to amend the draft Plan

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							end housing cost. The AJA submits an overview needs to be established with a new 'Consolidation Zone' being widely drawn around the Builtup area (based on the review of the Spatial Strategy proposed by the AJA) that does not count as rezoning but identifying areas within which Planning will identify specific sites that may be suitable for future housing. The States should then agree a site value with these owners more reflecting a slightly enhanced agricultural value than residential land. Where such an agreement has been reached Planning and the States can then, over a period of decades, bring them forward for including in the Built-Up area and tender the sites for housing provision.			and thus speculation from land owners and potential developers which results in increasing land values even before they have been re-zoned. The draft Plan has identified sufficient land for housing and provides greater certainty so by reducing the potential impact of speculation on land for future zoning.	
DP656		Mr Mark Le Boutillier	GR Langlois		Meeting Housing Needs	Objecting	The removal of the majority of the H3 & H4 sites from the plan:- The majority of these sites were selected for their suitability for housing from an original list of some 280 sites proposed. They were selected because of their locations and suitability for development. There is still a demand for family homes and these sites having already gone through a thorough selection process by Planning must still be considered appropriate for development? We believe serious consideration should be given to include more of the H3 & H4 sites to be retained on the new Island Plan for rezoning.		The comments of GR Langlois are noted.	The States Strategic Plan charges the Minister to identify, in the Island Plan sufficient development opportunities without further rezoning of green areas. The draft Plan, for the most part achieves this. Additional zoning of land for affordable housing may only become necessary should any of the proposed H1 sites be withdrawn or fail to obtain States approval. As drafted there is no need to designate additional land for Category A homes.	Noted by the Minister
DP957		Deputy Philip Rondel	Parish of St John Working Party		Meeting Housing Needs	Supporting	Housing (Consultation Reference Category A Housing Sites, 6.4 6 and Affordable Housing in Rural Centres is supported under section 6.64 and also 6.122 of the DJIP 2009) The question of any further building, whether residential or commercial within the 'Villages ' is an important issue. To meet the possible needs of the Parish and its parishioners over the next 10 to 25 years it is necessary to identify both the need from within the Parish and areas where residential development of Affordable Housing could take place without acting to the detriment of the 'Villages' and as and when required over the time period by Parish-led development. The need to build will be assessed on the basis of demand within the Parish. It is acknowledged that field 605 is already approved for category A housing (over , 55s). The DJIP 2009 refers to 100 homes being needed in the Northern Parishes in the next 10 years. Affordable Housing in Rural Centres is supported under section 6.64 and also 6.122 of the DJIP 2009. The Working Party have identified that plans have been approved for 19 new homes and that currently there are further		Noted	Noted	Support is noted by the Minister



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							plans pending for another 43 homes within the Parish - the total yield could be 62 should they all receive planning approval. See Appendix 4.				
DP253		Peter Searle			Category A Housing	Supporting	Housing Needs I fully support the development of the 7 sites identified I also support the current approach of restricting development in St. Martin The way I see the housing need for St. Martin over the next 10 years. 1) 100 New house across the 6 Northern Parishes St Ouen, St Mary, St John, St Lawrence, Trinity & St Martin. 2)St Martin allocation 17 Houses 3) Correctly 8 Houses plus are to be built on field 402 4) Leaving a requirement for 9 new houses to be built over the next 10 years 5) 1 house per year required	I Would like to see the Plemont site returned to nature and the land to be bought by the States. I would like to see as much agricultural land as possible stay in food production, as our children will need this in the future.	Support Noted	1. The States have rejected the proposal to purchase the Plemont site 2. There are policies in place to protect agricultural land	Support is noted by the Minister
DP537		Deputy John Le Fondre			Category A Housing Sites	Neither	Environment - within the Plan there are some proposals over the percentage of social rented housing / homebuy etc that should be included in any mix of a development. Reference is made to this being done by reference to the viability of the scheme and there is also reference to the payment of a commuted sum. I refer to this later, however in essence this is creating some form of tax, over and above planning gain. In my view this needs to be carefully considered, however it would seem to me that if designed correctly, such a tax could also include environmental incentives / disincentives towards designing 'greener' buildings. This has to be very carefully considered, given that if a project is not viable, it will normally not be built.		Noted. The impact of the policy on viability is understood. The recommendation for encouraging greener homes is not relevant to this particular policy		Noted by the Minister
DP580		Deputy John Le Fondre			Category A Housing Sites	Neither	Inconsistency - Cooke's Rose Farm - St Lawrence - Para 6.79 refers to a theoretical maximum density of 15 dwellings per acre. However Appendix B2 refers to 19 dwellings per acre for this site. Is this a typing error ?		Noted		Minister to amend error in Plan
DP1101		Mr Roy Smith		Policy H 1	Category A Housing Sites	Objecting	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.	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 solely grow flowers for a living on a commercial basis for the local trade. Partnership agreement with developer During the period of the running	Mr Smith's comments are noted. The planning application process, and any subsequent appeal if refused, will	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	The Minister is minded to increase the size of the site and carry out further consultation.

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								<p>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 A housing) 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 '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 Policy G1) which are aimed at directing development to defined built up areas with existing infrastructure and amenities. Under these existing policies and subject to showing compliance with the detailed requirements listed under Policy C20 we felt that we could reasonably expect that permission would be granted for a housing development on the site. My architect and advocate have also previously pointed out that, under the existing Island Plan: (1) the site is not zoned for Category A housing (2) the site is not zoned as a 'safeguarded site' for future Category A housing, which is the case with two other glasshouse sites on the Island; Carrefour Selous and Gorey (3) there is no requirement under Policy C20 that redundant glasshouse sites alongside defined settlement areas should be redeveloped for Category A housing Recent and current planning circumstances (1) Refusal of permission On 12th November 2008, an application was submitted by JK Limited to redevelop the site to provide for 31 houses and 15 apartments. This</p>	<p>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>		

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								<p>application was refused on 12 November 09 for two reasons which are summarized as follows: (i) that the Minister does not accept that all the glasshouse complex is redundant or dilapidated and, because the proposed development also includes an area of polytunnels, the proposal is contrary to Island Plan Policy C20 (ii) that insufficient information has been submitted to demonstrate that the proposed development will not have an adverse impact on the ecological 551 to the north of the site We were and are most aggrieved that, after 12 months following the submission of the application, and without any reasonable explanation for the delay in dealing with the application, permission was refused for these particular reasons given that; (1) on the question of redundancy, I had been required by the Agriculture Department to advertise the more modern area of glass in the JEP for a 3 month period to demonstrate redundancy not only to myself but to the agriculture industry generally. This I did and no replies were received. The Agriculture Department confirmed the redundancy of the nursery on 1st May 2009 Also the new Draft Island Plan, which was published 10 months after submission of the application and 2 months before determination of the application, and which proposes the site for 'Category A' housing, itself refers to the glass houses as being redundant! (2) part of the refusal concern s the inclusion of the polytunnels area within the scheme and yet, given that this is such a basic simple issue to address, why did it take 12 months to refuse permission on the this basis. If we had been advised of this concern shortly after submission of the application, we would have considered amending the plans. I would also point out that the inclusion of the polytunnels area went hand in hand with the removal of a glass house on another more sensitive part of the site together r with other environmental improvement measures. (3) the other reason for refusal concerns insufficient information relative to any impact on the adjacent 551, and yet the Department's Planning Officers, in recommending refusal on this basis, had not advised my architect of this concern nor requested any further information to give us the opportunity to address the matter. (2) Royal Court Appeal On 15th December 2009, an amended Notice of Appeal to the Royal Court was made against the decision to refuse permission. An agreement has recently been reached to put a temporary 'hold' on the appeal proceedings</p>			

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								<p>pending a decision on a revised planning application which is referred to in following point (3) (3) Revised Planning Application On 18th January 2010, a revised 'outline' planning application was submitted to redevelop the site for housing. This application involves a reduced site area compared to the previous application, excluding the poly tunnels area on the north east part of the site. This application has not yet been determined but hopefully permission will be granted. If refused, it is intended that a further appeal to the Royal Court will be made, to be considered alongside the appeal against the first refusal. (4) Request for Complaints Board Hearing On 4th February 2010, my advocate submitted a request for a hearing by the States of Jersey Complaints Board, to review the unacceptable delay in the processing of the November 2008 planning application, and in particular to investigate whether the application was deliberately delayed by the Planning Department and Minister pending the further progression of the Island Plan Review. (5) Offer of compromise proposal Just prior to the Planning Panel's consideration of the November 2008 application, my architect wrote to the Planning Department to explain that, despite our opinion that the redevelopment of the site for housing (and not 'Category A' housing) complies with the existing Island Plan policies, we would be willing to engage in discussions with the Department and Minister regarding a possible compromise proposal. This would be on the basis that, if the November 2008 scheme was supported, we would be prepared to offer a percentage of the units to first-time buyers. This offer was not taken up. For more detailed information on the above, the following are attached. 1. Layout plan and perspective drawing submitted with November 08 applications 2. Planning and Design statements submitted with the November 08 application 3. Notice of refusal dated 13th November 09 4. Notice of amended Notice of Appeal to the Royal Court dated 15th December 09 5. Letter dated 4th February 10 from Advocate N.M. Santos-Costa requesting a Complaints Board hearing 6. Site plan for revised outline planning application January 10</p>			
DP157		Mr Stephen de Gruchy		Policy H 1	Category A Housing Sites	Supporting			Noted		Noted by the Minister
DP24		Mr Charles		Policy H 1	Category A Housing	Neither	I am writing in response to the proposed rezoning of field 785 in St Ouen for category A housing.	Firstly, field 785 is 4 - 5 feet higher than our property, if 2 storey houses are built close to the	The comment		Noted by the Minister

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		Prouten			Sites		Although we have no objection to the plan we feel we must try to protect our property La fontaine Farm which is directly adjoining to the east of Field 785.	boundary they will overlook our home and will be able to see directly into our kitchen window. The window is 8 feet wide and the kitchen is a room in which we spend much of our time. This will greatly infringe on our privacy and enjoyment of the property. I feel that a permanent physical barrier will be needed to prevent this, such as an earth mound, concrete walls or substantial fencing. You may say that trees and shrubs will be planted along the boundary but as with our experience of Clos de Vautier which was built next to our field 783 at the rear of our property this is not sufficient. Some trees died, many were trampled by children and some even cut down by the tenants/owners. They also do very little to stop noise pollution and trespassing all of which has affected the enjoyment of our space at the rear of our property where we used to spend a lot of our leisure time. I therefore ask that if houses have to be built in field 785 that they are not built too close to the boundary, not too high and that some sort of physical barrier is put between them and our property. Secondly, we have a large granite barn which faces west towards field 785 which we hope to develop in the near future. Will this barn be deemed as overlooking the proposed housing? Stopping us developing it even though the building was there long before the proposed properties which are likely to overlook us! Some sort of guarantee that this will not happen would be an advantage. I hope you will take notice of these points and although I realize building has to go on, surely it cannot at great cost to other properties which were there many years before and which we have put a lot of financial commitment into.	s are noted, but are essentially related to detailed planning and are not sufficient to delete the site from Policy H1		
DP242		Mr Peter John Le Suer		Policy H 1	Category A Housing Sites	Supporting	None - The new areas chosen for housing in St. Clements, St. Ouens , St. Saviour, St. Lawrence, St. Peter and Grouville appear ideal for re-developing for housing and in many cases old glasshouses no longer in use or old industrial areas now no longer required as such, will be used for housing, rather than using agricultural land.		Noted		Support is noted by the Minister
DP255		A Brown		Policy H 1	Category A Housing Sites	Objecting	No future large scale development in St. Clement Future developments to be considered in Parishes such as St. Martin, St. John, St. Mary, St. Lawrence, Trinity and St. Ouen. The Constable of St. Martin has stated that more affordable housing is needed in his Parish. Such developments will lead to better transport links throughout the Island	Better transport links throughout the Island Parishes being able to retain young people ensuring a vibrant and strong parish lifestyle for the future Relieve current over crowding in other Parishes Provide potential new business opportunities in these Parishes.	Noted		Minister likely to recommend deletion of Samares Nursery from the Draft Plan given opposition of the Constable and a petition
DP359		Mr Vincent		Policy H 1	Category A Housing	Objecting	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	Comments noted		Minister likely to recommend



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		Obbard			Sites			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.			deletion of Samares Nursery from the Draft Plan given opposition of the Constable and a petition
DP38		Mr Anthony Paintin	La Societe Jersiaise, Ornithology Section	Policy H 1	Category A Housing Sites	Objecting	Removal of the De La Mare Nurseries site, from the list of proposed cat A housing sites.	On Behalf of the Ornithology Section of La Societe Jersiaise, I wish to object to the re-zoning of the De La Mare Nurseries site, Grouville, for cat A housing. The development encroaches too closely upon the designated SSI Grouville Marsh, one of the most important marshland habitats in the Island. Over the past years there have been a number of developments adjacent to the marsh namely, Les Maltiers, La Motte Garage Site and there is also a proposed cycle track route along the southern boundary. Any development adjacent to Grouville Marsh will only increase disturbance and we consider the main threats to be:- Predation of birds and mammals by domestic cats. Danger to children entering the marsh, there are areas of deep water, immediately behind the nursery site. Possibility of water pollution. Fly tipping, this already occurs in other adjacent areas of the marsh. Noise and light pollution. Tony Paintin, Bird Recorder, Ornithology Section, La Societe Jersiaise.	The points are noted.	There should be a buffer strip between the proposed development and the marsh	Noted by the Minister
DP385		Mr Paul Martin		Policy H 1	Category A Housing Sites	Supporting	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	Comments noted		Minister likely to recommend deletion of Samares Nursery from the Draft Plan given opposition of the Constable and a petition

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								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 will blindly stick to a NIMBY' point of view to the detriment of the community as a whole. In particular, the Samares Nursery site has received a number of critical responses and yet, based on the specifications in Appendix B to the Island Plan, this site appears particularly suitable: The site is already within a build-up area and is not a green field site. Due to existing concreted areas it is expressly recognised that in the Island Plan "reinstating the land to agricultural use is well nigh impossible". Samares Nursery is located within a popular area: it is close to St Helier, has good transport links and has several schools close by along with numerous facilities (sports, youth club, shops, beaches). From the perspective of those living nearby, the site is not visible from the main road and will have limited visual impact on the surrounding environment and would actually improve what is there already (redundant glasshouses and concrete). Most importantly of all, the Samares Nursery site is stated as being equivalent in size to all of the other Category A Housing Sites put together. Developing this particular site would therefore appear critical to deliver the required number of new houses - the other sites "chip in" but without development at Samares Nursery other sites will be required elsewhere.			
DP623		Deputy Ian Gorst		Policy H 1	Category A Housing Sites	Objecting	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

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											opposition of the Constable and a petition
DP624		Conneta ble Deidre Mezbour ian		Policy H 1	Category A Housing Sites	Objecting	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 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 distance away. It is unlikely that the Parish would support off-site sewers along Parish roads. Public Transport Routes 5 and 7 currently serve this site, however theses services are not "commuter friendly". It is highly unlikely that a frequent bus service will be provided that would be economically viable to the States of Jersey. Traffic Impact There is few alternatives for commuters; therefore the number of vehicles generated from the site would be high. With few employment opportunities in the area, most commuter journeys to the Island employment zone in St Helier would utilise the already busy Mont Felard road and the junction with La Route de St Aubin. The site has very poor links into the immediate road network. This road network is sub standard and in the middle of an existing piece meal		The Constable's comments are noted		Minister likely to recommend deletion of Cooke's Nursery from the Draft Plan given opposition of the Constable.

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							<p>development. The only access to the site is from La Grande Route de St Laurent, by way of turning into Le Passage, a narrow Parish owned road. The road is one way only from that direction, specifically because it is too narrow to be two way. Other nearby Parish roads have been made one way in an effort to mitigate road safety. The Parish is responsible not only for the upkeep and the maintenance of Le Passage, but also has responsibility for policing the one way systems. The Honorary Police and I already receive (regular) calls from nearby residents regarding drivers turning into Le Passage from the "No Entry" end adjoining La Rue Sara Henri, as well as by turning right from Le Clos de Devant and La Clos Sara. The roads nearby, through both Le Clos de Devant and La Clos Sara, leading directly into Le Passage, are private roads, owned and maintained by the residents. I reiterate that both roads are privately owned and should not be taken into account as access into Le Passage. Nearby residents are concerned that these private estates will be used as a short cut to any new development. This is already the case, in spite of the "Access to Premises Only" signs erected by the residents to prevent non residential vehicular access into Le Passage. There are already challenges in accessing the site, consideration must be given as to how these would be overcome for construction vehicles. I believe that there are obvious road safety implications if this development is approved, particularly for: Pedestrians, Cyclists and Horse Riders The area is well used by pedestrians, by cyclists and by horse riders; Le Passage itself joins on to La Rue de Douet du Rue, which is a green lane; I understand that Le Passage and the surrounding lanes form part of Route 4 of the cycle routes set out by Jersey Tourism. Only the keenest cyclist would be likely to attempt the challenging commute into the main employment area within the town. There are few community facilities within reasonable walking distance. With few roadside footpaths, walking to the nearest shop or to the St Lawrence Primary School cannot be encouraged. The narrowness of existing roads does not allow for the construction of further pavements; had this been an option, the Roads Committee and I would have considered them as part of our commitment to improving pedestrian safety within the Parish. Traffic (both pedestrian and vehicular) has already increased considerably in the area following the development a few years ago of an estate of eleven properties in Rue de Douet du Rue. Schools The St Lawrence Primary School is more than a mile away</p>				

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							<p>(1600m) already most parents do not permit their children to walk or cycle there. Traffic congestion at the school is considerable during morning drop off and afternoon collection times, with La Rue de L'Eglise inaccessible at those times. The second Primary School in the Parish, Bel Royal, is 3,200m away, the only pavement on the route begins at the bottom of Le Mont Cambrai. Apart from these, the closest Primary Schools are St John (2,000m) and St Mary (2,200m). The distances to the State Secondary Schools are: Haute Vallee (4,000m) Grainville (5,500m) Les Quennevais (6,000m) Haute Vallee is the catchment area school for St Lawrence Primary School, the nearest school to the proposed re-zoning site. This Draft Island Plan places an emphasis upon a reduction on our car dependence and proposes that new developments should be located to reduce the need to travel, particularly by car. Notwithstanding this Draft Island Plan, the current Plan (2002) has similar policies. Policy H8: Housing Development Within the Built Up Area The site is in the designated built up area and while there is no "right" to develop, this policy states that development will normally be permitted provided the scheme accords with the criteria in the policy. One of those criteria is Article (v) which states that development will not lead to unacceptable problems of traffic generation, safety or parking. I believe that there will indeed be unacceptable problems of traffic generation and am concerned that pedestrian safety will also be compromised. I believe that the following sections of the current Island Plan must also be considered before deciding whether to re-zone: Strategic Policy Review Environmental Objectives (2.9) To reduce the detrimental impact of traffic upon peoples lives To limit the impact of noise and other nuisances Quality of Life Objectives (2.9) To limit the detrimental impact of traffic on the lives of Island residents To limit the impact of noise and other nuisances Built Environment (2.12) To integrate into the sustainable transport policy measures to address traffic related problems in the built environment Key Rural Settlements (3.24) Some are very restricted in capacity due to their local environment... and physical restraints such as access Accessibility (3.34) and (3.35) Reducing the need for motorised travel Ensuring that those who do not always have access to a car can gain access to facilities and services and are therefore able to participate in society Accessibility (3.34) and (3.35) The first priority of the strategy is for housing development to be located within walking distance</p>				



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							<p>of jobs, facilities and services The second priority is for development to be within walking distance of a bus route Other locations would need additional facilities such as a primary school within walking distance Environmental Impact (3.36) The environmental impact of development can be assessed in terms of habitats and biodiversity Avoiding Constraints and Ensuring Practicality (3.37) Site access and existing traffic problems Capacity of schools Transport Strategy (3.53) and (3.54) and (3.56) and (3.60) Reduce the detrimental impact of traffic upon peoples' lives Limit the impact of noise and other nuisances Develop transport and planning policies which encourage the use of public transport and minimise the use of other vehicles The policies will encourage cycling and walking Improve facilities for pedestrians with safe routes along roads Improve safety and security for transport users, giving priority to pedestrians and cyclists I have noted with interest that the Transport and Technical Services Department have consistently opposed this site for re-zoning . Amongst a number of comments submitted, they have asserted that it does not accord with the States of Jersey Strategic Plan 2009-2014, which clearly aims to "persuade people out of their cars" . Fundamental to achieving this States agreed policy is the location of new housing, which must of necessity give the option to persuade people out of their cars. As the local Highway Authority, I formally request that a Transport Statement be produced to assess the potential impact upon all nearby Parish roads at peak times, before the Draft Island Plan is approved. Transport and Technical Services Traffic Engineers made the following Highways Comment during the recent application process for another development in Le Passage: "It is noted that there may be an increase in frequency of use at peak times. Visibility at the La Rue Sara Henri/La Grande Route de St Laurent is below standard, and visibility at the Le Passage/La Rue junction is practically nil. The Department cannot support any increase in use of the Le Passage/La Rue junction". The St Lawrence Roads Committee and I endorse these comments. I trust that this submission has been of help and that it makes clear the strength of Parish opposition based upon sound policy objections.</p>				
DP657		Mr Mark Le Boutillier	GR Langlois	Policy H 1	Category A Housing Sites	Objecting	Policy H1. The increase of the percentage of affordable homes from 45% to 75% on sites rezoned for Cat A housing:- We do not believe many landowners will be persuaded to sell their land at a price that will make developments viable		GR Langlois's comments are noted but	The evidence base in the plan for housing needs is based upon the best available at this time so and amendments to this policy will only be made should new	The Minister is minded not to amend the plan.

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							with this revised percentage split.		not accepted	evidence emerge. If there were to be discussions on notional evidence then it could be argued that, given the recent economic downturn, the need for the Jersey home buy category of housing is actually higher than the stated 75%.	
DP681		G V Gaudin		Policy H 1	Category A Housing Sites	Objecting	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
DP692		Mr Andrew Fleet	Style Group Ltd	Policy H 1	Category A Housing Sites	Objecting	Windfall developments - the estimation of 1700 dwellings coming forward on 'windfall sites' is far too optimistic. The basis of the assessment that from 1990 to mid 2006 such developments accounted for an average of 165 homes/annum is not relevant to the period of the draft Island Plan. This period did not have policy EI or H3 preserving employment sites or introducing affordable housing. For the reasons raised else where in this paper, windfall sites producing 1700 dwellings is unrealistic. This figure will fall dramatically due to the impact of Policy E1 and H3, therefore creating the requirement to identify additional housing sites. These additional housing sites should be identified now on redundant glass house sites on the Island to replace the deficit on windfall sites. Delivery of new housing - it is admitted in the Draft Island Plan under item 6.85 that zoned sites may not be brought forward for development. In this event it is supported that there may be a need to effect their acquisition by the States to realize the provision of homes to help meet demand. Why are the States suggesting using tax payer's money to acquire sites for Category A housing when the private sector is prepared to offer derelict glass house sites for development at no cost to the tax payer? Alternative sites are available now and should be identified now as part of Policy H1		The comments are noted.	The Minister is likely to reduce the proportion to 20% and the threshold site size to 10 homes and above. He may also defer policy H3 for 12 months to allow sites on which values have already been agreed to clear the planning application system. This will make the requirement less onerous, and most developments will not need to meet the obligation. Accordingly, it is anticipated that we will be able to meet the anticipated requirement of 600-650 affordable homes through policy H3. Should any of the H1 sites be withdrawn, or not agreed by the States, it may be necessary to replace them with new sites.	If H1 sites are conceded or not approved, new sites will need to be found to displace them
DP713		Mrs J Egge		Policy H 1	Category A Housing Sites	Objecting	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 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

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							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.				
DP777		Michael Paddock		Policy H 1	Category A Housing Sites	Objecting	I do not think this development should take place.	My mother who is 78 owns a property just down the road heading towards Route de Trodez her property floods now from the surface water a lot which comes from that site. TTS have tried to solve the problem but failed. I do not believe it is right that most of the traffic leading to this area should come down Route de Trodez and Route de Millais the noise, speed and volume on these roads has affected the resident's quality of life living in this area. If this development was to go ahead the parking arrangements on site would need to be well thought out lessons have to be learned from the Ville Vantrier site I suggest you talk to St Ouen Honorary Police about the subject. The location of this site is remote people will use cars, public transport does not carry many people I see the bus every day this development will put more pressure on traffic on the west of the Island. That is just a few comments I could go on with a lot more.	The comments are noted	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.	Noted by the Minister
DP784		Senator Terry Le Main	States of Jersey Housing Department	Policy H 1	Category A Housing Sites	Objecting	Policy H1 fails to make any provision for social rented homes. That would in my submission be a very grave mistake. The words 'Jersey Homebuy' should be replaced with 'Social rented or Jersey Homebuy in proportions to be defined by the Minister with reference to the prevailing need identified by reference to the Affordable Housing Gateway'. I would advocate keeping the site make up proportions as flexible as possible in order that we can take maximum advantage of market conditions and prevailing need as and when sites come forward. Undoubtedly the flexibility offered by the 2002 Island Plan and the subsequent amendment to Policy H1, which the States approved, allowed you to use the La Providence site		The comments of the Housing Minister are noted	Consideration will be given to this suggested change of wording to allow the Minister to apply the requirements in a more flexible manner - 'Social rented or Jersey Homebuy in proportions to be defined by the Minister with reference to the prevailing need identified by reference to the Affordable Housing Gateway'	The Minister notes the comments of the Housing Minister.

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							to deliver upon your election manifesto to introduce Shared Equity (Jersey Homebuy). In her report on social housing provision in Jersey, Professor Christine Whitehead OBE raises significant concern about the potential unmet need for social housing in Jersey which we are only just managing to control by virtue of our extremely constrained and probably unsustainable allocations criteria. The point is that if we are too specific about the site use at the time of zoning we may end up with a development coming forward down the line with homes which do not properly address the needs of those needing homes at that time and little flexibility to adapt. Much better to keep it flexible and for you to decide on the appropriate proportion of the homes which will be used for the various Category A purposes at the time that firm development proposals are agreed. Such proportions must be based on the evidence that we will be able to produce from the Affordable Housing Gateway.				
DP844		Mrs Susan Kerley		Policy H 1	Category A Housing Sites	Objecting	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	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	Minister minded to support request to remove site from Plan.

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								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.		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.	
DP887		Mr Robin Barthorp		Policy H 1	Category A Housing Sites	Objecting	I was at the Parish Assembly last night which was, amongst other things, to discuss the rezoning of Field 622 off Rue de la Croute. Whilst I am not currently a resident of St. Ouen, I do have an interest in the outcome as I accompanied my elderly and partially sighted father, Major Michael Bathorp, who lives, as you may know, in Rue de la Croute. Also I spent my childhood years living on Route de Plemont, so I consider myself at least a little "St. Ouenais". Whilst I listened with great interest to the argument and counter-argument, which was both passionate and forceful on both sides, I feel compelled to protest that the outcome of the vote to re-zone was not altogether valid or fair. If I may explain my reasoning.... As the Procureurs counted the vote from the front to the rear of the Hall, the majority of people lowered their hands once their vote had been counted. I was sitting with my father about 3 rows from the front on the side nearest the village green. As the votes were counted for the vote against the proposal, I turned round after they had passed us to watch the proceedings, Imagine my surprise when the officer counting the votes on my side of the hall, indicated, as he approached the penultimate row that he had lost count and that he was starting again from the back row forwards. Many people, including my father, had already lowered their hands, as in the first round of voting and were not therefore included in the recount, because they were not aware of what had happened behind them. Surely if a re-count had been necessary it should have been more publicly announced and started again formally from the front of the Hall? Whilst I have absolutely no doubt about the integrity of the official concerned, I felt that he was at the very least rushing due to the lateness of the hour and the fact that people were restless to get home. I cannot say how many votes were missed during this flawed		Support for zoning Field 622, St Ouen Green zone noted	Field 622 St Ouen is not proposed for Category A development in the draft Island Plan. We have no comment to make on the procedures in the Parish Assembly	The Minister notes the support for zoning Field 622, St Ouen Green zone



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							count but find it hard to accept the some what farcical way in which it was carried out. I would be very grateful to hear your views on this important point.				
DP902		Conneta ble Len Norman		Policy H 1	Category A Housing Sites	Objecting	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 that 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 Clement, and this applies to resident from all parts of the Parish including our more urban areas. The Minister's Promise I have been reassured by your regularly made	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.

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								<p>promise in public that you would not allow large scale development on sites unless you had the support of the relevant Parish Connétable, You can be in no doubt that on this occasion my support will not be forthcoming. It might be that you would wish to go above my head and attempt to persuade the St Clermentais to support the development. To dissuade you from this course I enclose a copy of the minutes of a Parish Assembly held on February 8, 2005 when a proposal was put forward to provide something like 25 units of Parish sheltered housing on the site on the understanding that the Assembly would support the provision of 125 additional houses on Samares Nursery. I was at that meeting, which filled the Parish Hall almost to overflowing, and indeed the discussion was lively and the resulting vote was almost unanimously against the proposal. There has been no change in mood, and indeed the sheltered housing/retirement home scheme will now be going ahead on a site which you brought forward for rezoning a year or so ago. We are not ducking our responsibilities. Other Uses It is inevitable that despite the size of the site it will be claimed that it will never again be used for horticultural or agricultural purposes. And while there is "hope value" for housing development this might well be the case. But this depends on the economic situation at any given time. With food prices around the world rising it might be that in the not too distant future we will be looking for areas such as this to sustain our own population, and increased food prices may well make Samares Nursery viable gain. The site is in private ownership and whatever happens there I respect is for the owner to decide provided it is consistent with States policies. Being situated where it is, close to Le Marais high rise, many flats and apartments without gardens and recent developments with postage stamp gardens, the demand for allotments in this area is bound to grow. It is recognised that some investment will be needed to create allotments on this site - as it will be for any site near the urban area - but I suggest that this would be a much more appropriate and acceptable use that creating a 100 homes, which by your own figures, we do not need. Indeed your own policy of (or lack of it) on garden grabbing is going to increase the demand for allotments as more and more gardens have concrete poured over this important private amenity and growing space. If you think it would be helpful to convince you of the strength of feeling of St Clement I</p>			

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								would be quite happy to organise a major demonstration near the site and provide a significant petition. Please let me know if you would like me to do this. Finally, I believe the sentiments expressed in this letter are shared by the two Parish Deputies.			
DP934		Mr James Godfrey	Royal Jersey Agricultural & Horticultural Society	Policy H 1	Category A Housing Sites	Objecting	Compulsory purchase: The concept of compulsory purchase should be resisted as there is too much scope for its abuse; indeed the States has a poor track record in this regard.		Reject	The use of compulsory purchase powers will only be used where absolutely necessary and their use is strictly governed by law.	The Minister is not minded to amend the draft Plan
DP785		Senator Terry Le Main	States of Jersey Housing Department		Previously Zoned Category A Housing Sites	Neither	Paragraph 6.89 The delays in the delivery of sites zoned for Category A housing must be a very real concern for the Public. When land has been zoned specifically to meet defined and more often than not very urgent need, it cannot be acceptable for developers and landowners to simply sit on sites until it suits them to develop. For that reason we must consider putting a development timescale on sites when they are zoned. If work on site has not commenced substantively by the deadline then the site switches to Public ownership by way of compulsory purchase. This process and the timescales should be approved by the States as part of the zoning process. This would ensure timely development and might dovetail into comments that I will make later in this letter in respect of how commuted payments from developers can be utilised by the Public in the absence of land on which to develop.		The Housing Minister's comments are noted.	Policy H1 already provides for the use of compulsory purchase powers to ensure that sites are developed in a timely manner	Noted by the Minister
DP159		Mr Stephen de Gruchy		Policy H 2	Other Category A Housing Sites	Supporting			Noted		Noted by the Minister
DP771		Mr Graham Bisson		Policy H 2	Other Category A Housing Sites	Objecting	Trinity - Field number 1404 - La Grande Route de St Jean This small field of exactly 1 acre in size is flat, level, well drained and has an existing access via a short lane leading to the main road to the west known as La Grande Route de St Jean. It is also at the heart of the relatively new Sion Village . The field is secluded and bordered on all sides by private dwellings, a garden centre and commercial premises being a filling station and general retail store. All mains services are available in La Grande Route de St Jean. This field was chosen by the Planning and Environment Department to be included as an H4 site in the current Island Plan. (Number 19 of 21 sites) H4 sites were those "safeguarded for future category A Housing needs" and would subject to public consultation be considered for rezoning, "depending upon housing		Reject	Site does not comply with spatial strategy and does not meet with planning Minister's criteria for protecting green fields and open spaces. This includes the extension of the built-up area boundary, into the countryside, to allow for smaller-scale incremental development opportunities. There are, therefore, considered to be no grounds for the release of additional greenfield land.	The Minister is not minded to amend the draft Plan

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							demand and land availability" Under paragraph 8.1 12 (which followed immediately after the H4 statement in the current Island Plan) it was stated that ; "The Planning and Environment and Housing Committees are aiming to ensure that all Island residents, including those in need of affordable or special need housing, have the opportunity of a home." Etc In the proposed Draft Island Plan H4 sites no longer exist. This site could be easily developed to produce 16 first time buyer homes in the heart of an existing small village settlement. As a member of the family that owns this site, I wish to inform you that we are willing sellers and have reached agreement with a medium sized local developer who is keen to proceed. I would therefore ask that serious consideration be given to the rezoning of this site in order that it may be included in the proposed Draft Island Plan when it is approved.				
DP980		Mr. Maurice DUBRAS		Policy H 2	Other Category A Housing Sites	Supporting	Policy H2, of Field 873 potentially as a sheltered housing site is positive. The community badly needs such a development in this area. However, I trust that this is the last 'new' area of lower St. Lawrence to remain designated for Housing; we have already had our share, some would say 'more than', of public or Category A housing.		Noted		Support is noted by the Minister
DP1174		Mrs. Celia Scott Warren			Affordable Housing	Neither	I support consideration being given to new ways of building homes more cheaply in Jersey, to bring them within the financial means of young people and other aspiring home owners. This may mean bringing in builders from France or other parts of Europe. We need to think 'outside the box' regarding how we can deliver homes more cheaply in Jersey.	I feel we should do further work to consider the knowledge gained on the visit to see housing in France. We need to address the issues regarding how these homes can be built more cheaply than we are able to do in Jersey.	Noted		Noted by the Minister
DP581		Deputy John Le Fondre			Affordable Housing	Neither	Ref: Paras 6.96- 6.116 Viability - I note the intention of the Minister and the principle appears extremely laudable. However some of these proposals have (in my view) the characteristics of being a tax, particularly as they impose a cost (including the possibility of a commuted sum), which is determined by an ability to pay (ie the viability of a project. To me this whole section needs very careful consideration, in conjunction with Treasury and perhaps Property Holdings and some other stake holders. In my view this section should be heavily simplified, to refer to proposals to be brought separately to the States, and that a small working group be established to consider this. I have previously looked at a form of levy based on the cost of a build (ie therefore it is an objective measure), and to me these particular proposals have the potential to be cumbersome. It may be the case that a combination of planning gain and some		Noted		Noted by the Minister

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							form of charge might be the way forward, and the latter could also potentially influence behaviour in other areas (e.g. more environmentally friendly buildings etc).				
DP698		Mr Andrew Fleet	Style Group Ltd		Affordable Housing	Objecting	<p>The impact of the recession on the housebuilding industry will now be the key determinant on the delivery of new housing. The principal issues will be; firstly, the potential for several years of low housing completion causing a gap in the trajectory which will be difficult to cover later in the plan period. Secondly, the relationship between the development of Windfall and Brownfield land will require a re-evaluation to ensure both regeneration and housing targets are each given appropriate priority. Thirdly, despite UK government intervention bank lending remains restricted and finance for either housebuilding or purchasing will be the overriding constraint on delivery. Many sources predict what is called a 'W recovery where instead of a straight line to recovery there may well be a second recession. The implications of a second period of downturn are that trajectories which depend on sustained levels of housing delivery late in the plan period to compensate for a gap in 2010 - 2015, may turn out to be unsustainable. This possibility needs to be taken into account in new housing projections, together with the uncertain impact the proposed affordable housing policy will have on the rate and volume of future housing development. Whilst there are positive signs of the economy beginning to recover consumer spending will take time to return to pre 2008 levels. All these factors point to a slow recovery from recession for the property market with no 'boom time' housing completion levels to replenish housing forecasts within the foreseeable future. There is a saying that the worst possible things happen at the worst possible moment. This is certainly true for the impact caused by the reduced viability of housing projects. This began before the recession, but had been masked by the successful boom years. If true, the 'austerity circumstances' in which we now find ourselves combined with reduced viability and reduced sales value will act as a considerable disincentive for investment in housing projects. Project viability is predicted to be the post recessionary period's most important issue, and will undoubtedly be made more difficult by the introduction of a 'tax' on development. Even before the current recession, many developers were concerned that their sites would become unviable unless there was some relaxation or deferment in new building regulations, percentage</p>		<p>The impact of the current recession on both the demand for and delivery of new homes is recognised. We are assuming a 'normal' projection of demand and supply over the plan period which recognises that while there may be economic 'highs' and 'lows', they will average out over the 10 years of the Plan.</p>	<p>The Minister is likely to reduce the proportion to 20% and the threshold site size to 10 homes and above. He may also defer policy H3 for 12 months to allow sites on which values have already been agreed to clear the planning application system. This will remove the 'disincentive effect' from over 80% of all applications.</p>	Noted by the Minister



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							for art and eco-standards. With the proposed introduction of affordable housing the cost of meeting many of these requirements relies on ever increasing house prices and static land values this will now render many housing projects unviable. The fear is that the increased burden on landowners and housing providers will mean that they have little or no incentive to release land or build new homes on the scale necessary resulting in a reduction of new homes to the Island. Conclusion It may take a long time before the market is able to deliver anything near the quantity of housing we need. The reasons for the market failure go beyond the reach of housebuilders, planning authorities and land owners. Other factors have played their part, and under-supply of development land with planning permission has been a fundamental obstacle, as has, more recently, a chronic shortage of mortgage availability. However, the uncomfortable truth is that levels of supply are falling, while demand and need are rising. The introduction of affordable housing at this difficult time in the economy is likely to reduce the number of new homes constructed , increasing the demand, increasing the price and reducing the affordability for the first time buyer. Therefore the proposed policy of affordable housing will have the immediate effect of reducing affordable housing to the Island and will not achieve its objective of increasing the level. A radical re-think to the entire proposition is required. The identification now of additional housing land is required to meet the demand and maintain the balance of supply to the Island. It is required to maintain the affordability to the Island and to prevent the lack of affordable housing reaching critical levels during the period of the Island Plan.				
DP1016		Ray Shead	The Jersey Chamber of Commerce	Policy H 3	Affordable Housing	Objecting	This is not workable. The percentage required for affordable housing is too high, and it is suggested that if this is to be implemented it should be phased but starting at say 10%with an agreed maximum. A connected payment if a developer cannot reach the required percentage is not accepted. This policy could stop most private residential developers. There is no doubt that something has to be done to encourage the provision of some social housing in the future but this is being sought by levying stealth tax measures on developers rather than being 'pump primed' by government by way of various financial initiatives. The contribution by Property Developers to social housing is too onerous. The thought of the "unknown" has already prevented developers from investing money in Jersey and the		The comments of the Chamber of Commerce are noted.	The comment effectively advocates the existing method of procuring affordable housing by designating low value land specifically for this purpose, which has proved a particularly effective under the 2002 Island Plan, as an alternative to Policy H3. This would necessitate identifying sufficient low value land (either green field or glasshouse sites) to accommodate the target number of homes to be delivered by Policy H3 (600-650). This would necessitate designating green-	New sites need to be found to replace Samares Nursery, Cooke's Nursery and Longueville Nurseries.

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							current proposals will probably have an even more adverse effect. Developers are already faced with an inefficient and costly planning process, not only in the ever increasing fees that are being charged but in the knock on effects of poor advice, leading to multiple applications, resulting in additional costs due to the additional time involved and additional architects' fees as a result of these multiple planning applications. Developers are quite often referred to as "speculative developers" but speculation is largely being removed and the Planning Department needs to encourage speculative development to help meet their housing quotas. In order to encourage speculative development, no affordable housing should be required on speculative or windfall sites. A social housing provision or requirement should only be insisted upon where sites are rezoned specifically for category A housing. This will have the result of, for example, a farmer turning a field from what is worth very little in agricultural value terms to something that gives an increase in value but not a feeling that he has "won the lottery" . The Draft Island Plan calls for affordable housing to be delivered on all developments of two houses or more and set as a minimum 40% of housing to be affordable on developments of six houses or more. With regard to category A housing sites, the requirement is for 75% to be affordable housing and 25% to be first time buyer. These proposals are draconian in the extreme and will prevent any Developer having any reasonable expectation of profitability. This will result in one or both of the following: (a) Where the Developer wants to make a profit the land value would have to be reduced to a level at which the owner of the land would not sell; and/or (b) The Developer knows he will not make a profit and will therefore invest his money elsewhere. Chamber is aware that this is beginning to happen with Jersey developers making inroads into the Guernsey, Alderney and UK markets. It is suggested that the Planning Department, in conjunction with some local developers, form a small working party to undertake desktop appraisals to consider how a development would stack up under the current Island Plan Regulations and under those that are proposed. This may convince the Planning Department that if it continues along the present route, the repercussions could be dire for the supply of new housing units into the market over the next decade.			field and former glasshouse sites for development, which has proved unacceptable to the public at large, particularly in those Parishes which are best placed to provide it in accordance with the Plan's Spatial Strategy. The Minister has assured the Constables of the parishes that he will not propose the development of sites for affordable housing against the wishes of the relevant Constable. The potential loss of 3 of the sites proposed in Policy H1 will necessitate finding suitable new sites to replace them	
DP1117		Mr Ben Ludlam	C Le Masurie	Policy H 3	Affordable Housing	Objecting		This is probably the most significant proposal in the plan and which will have a negative effect on	The comment		The Minister is likely to reduce

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			r Ltd					the provision of residential accommodation . It is unrealistic to apply the policy to developments of more than 2 units and this is far higher than the threshold in the UK, also the 40% provision for affordable housing is set too high. The potential provision of this sector of housing at these levels will render projects unviable, as the policy immediately reduces the existing land value significantly, for developers and thus no development will take place, further increasing the housing shortage. This policy will affect the land holdings of the States of Jersey very significantly and Property Holdings, for the Treasury Department, should provide detailed analysis of the affect on value and the potential impact on States finances. The private sector cannot be expected to effectively be providing housing, at no cost, for the States of Jersey on the proportions detailed and further work / research needs to be undertaken and the effects on the market.	s of C Le Masurier are noted.		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.
DP1180		Mr Roberto Lora		Policy H 3	Affordable Housing	Objecting	The Draft Island Plan White Paper proposes that the town of St Helier accommodates the bulk of new residential developments. However, this level of provision within town is considered to be unrealistic, and our reasons for reaching this conclusion are as follows:	Not all islanders have aspirations of living in flats in town, especially those originating from the country Parishes. The majority of category A housing sites to date have been on green field sites (including the most recent re-zoned in St Saviour and Trinity) and new local homeowners are not likely to want anything different, as they will have general expectations of owning homes with their own dedicated car parking, private gardens, and a safe environment. Realistically, St Helier is unable to deliver such accommodation or homes. This distorted weighting in favour of flats (i.e. 40% requirement for affordable/social rental) is not likely to encourage young families who aspire to live in houses with gardens to stay in Jersey, and therefore encourage outward migration of these people (middle Jersey), which will be counterproductive to the Island's Strategic Policies in relation to an ageing population, payment of tax, social security, pensions, and therefore the long term interests of the economy as a whole. Residential land value will NOT outweigh the existing land values. Therefore, in our opinion, there will be no commercial incentive to develop or redevelop existing sites in town for residential purposes. Also, the concept of requiring windfall sites of two houses or more to provide 40% affordable housing, thereby further reducing the value of land by 40% (quote BNP	Mr Loa's comments are noted.	Table 6.2 indicates that only a third of the planned new homes will be in St Helier (excluding the Waterfront), and it is not intended that they are all apartments. 1700 homes are anticipated to be achieved on windfall sites through the normal application process elsewhere in the Island.	Noted by the Minister

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								<p>Paribas real estate) will only exacerbate this lack of incentive, especially for the larger sites identified by PBSO Planning such as the Randall's site Ann Street Brewery, Le Masurier's land and so on. This Policy has wider reaching implications in our opinion, that will de-value all land values! Therefore, like the prime hotel site policy introduced in the late 1990's, banks will be unwilling to invest in the existing commercial operations because their exit strategy will have been effectively removed. Therefore, the equity within these properties would be significantly reduced. During this extremely variable economic climate banks are less likely to take the risk of lending to clients in these less favourable in circumstances, be it for mortgages, second charges, or whatever. The wider economy will therefore suffer as a consequence of this Affordable Housing Policy. As soon as this effect was identified by the hotel industry previously, the Prime Site Policy was removed at the time. Less onerous affordable housing policies has caused the U.K. house building industry to stall, as local planning authorities are not willing to relax their policies in light of the credit crunch. We find it most strange therefore that a recently failed U.K. policy is now being seriously considered within this document, and the States of Jersey. We are mindful that the market is already ahead of the adoption of The Island Plan, this is beginning to produce a crisis of confidence in whether to purchase sites now, fearful that because the affordable policies have been flagged, these will be applied to their sites, making their developments unprofitable. Consequently several of the islands larger HNW clients/developers are opting to turn their backs on Jersey, and are looking outside of the Island to invest money. We are deeply suspicious in respect of St Helier providing houses. Realistically St Helier can only really provide apartments, and if these also have to 'pepper pot' affordable units with non-affordable units, what tends to happen is that affordable housing is provided for the lower floors, with open market units on the upper floors. The affordable units then de-value the open market units, further compounding the lack of viability, and hindering the release of land until a new policy is proposed. Furthermore, the occupiers of the affordable units are unable to pay the service charges for these relatively expensive buildings, leading to their early deterioration or further financial problems. The requirement to mix</p>			

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								Category B and affordable houses in developments of six houses or more will further only serve to de-value to Category B houses and will make development of windfall sites far less attractive to developers. The fragmented ownership of land (especially in St Helier) causes great difficulty in assembling small sites to enable comprehensive developments to proceed owing to the various expectations of the owners. The States of Jersey have also shown themselves to be very reluctant in using Compulsory Purchase powers, since these are considered to be too draconian in our culture, and therefore politically unacceptable. The States have also suffered very high legal costs when they last used these powers (Lesquende, St Brelade) which has been a disincentive for them to use these statutes in the recent past.			
DP160		Mr Stephen de Gruchy		Policy H 3	Affordable Housing	Supporting	Support with Caveat Regarding the penultimate paragraph I feel that the rounding up should only occur when the figure arrived at is more than 0.5 of one unit. Otherwise, developers of smaller areas are disadvantaged. For example in a 6 unit development, Policy H3 would actually impose an affordable homes figure of 50%, not the stated 40%. (i.e. 6 units x 40% = 2.4 units, which Policy H3 would require to be rounded up to 3 units.)		Noted		Support is noted by the Minister
DP239		Bill Sarre	CBRE	Policy H 3	Affordable Housing	Objecting	Ideal Scenario My opinion is that the ideal scenario is not to place affordable housing onto brown field sites, thereby maximizing the number of units that are constructed in the Island. The States would then become responsible either through the existing department or a new vehicle, to provide social housing in conjunction with the green field sites it has rezoned. This vehicle could benefit from existing sites owned by the States, e.g. JCG perhaps together with some funding to kick start schemes. The development vehicle would then seek to provide housing either through development of sites or the purchase of existing units (e.g. houses, blocks of apartments) and utilise them to provide the housing required by the Island. Sources of Funding - Development Tax Any taxation on development has historically been seen to have a negative consequence and any consideration should be thoroughly tested and thought out. However, it is possible that a simple flat rate tax at a relatively low level, starting for larger schemes could have a reduced impact and yet raise funds for affordable homes. I am no expert, but I am led to believe that in the UK, frequently schemes of 10 units or above are treated separately and this maybe a sensible level, as you are dealing with more established developers and larger sites.	The plan seeks to transfer the burden of providing affordable homes purely from rezoned land to sites in "brown field" locations. This provides major problems and I would strongly request this is substantially revised or dropped. The policy worked with rezoned green field lands as there was still a material increase in land value in the rezoning so that the housing restrictions were palatable to both the land owner and developer. In the absence of the States buying land, the provision of new housing requires willing developers (buyers). The migration of this policy to include brown filed sides will have the following consequences: i) It will reduce urban site values including the States owned portfolio. ii) It will reduce the number of infill development schemes (windfall sites). Frequently, existing site values are similar to a housing scheme, as such these restrictions would make some new schemes unviable. iii) It will complicate the planning system, increasing developer and States costs. It will increase bureaucracy and manpower requirements required to vet the financial viability of the schemes, the input costs and make recommendations. It will slow down the system. iv) It will increase the risk and general levels of concern in dealing with speculative sites reducing	The comments are noted and understood, in particular the impact on viability and the consequential danger that landowners will withhold sites from development. The States may well need to consider using part	Minister is likely to recommend to the Inspectors that this proportion will be reduced to 20% and apply only to sites over 10 homes. The Minister may also defer implementation of Policy H3 for 12 months to allow sites on which there are existing agreed values to clear the planning application system	



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							Starting at 2 units is too low. The flat rate could either apply to the site value, end value on a square footage basis. As it would be simple and known in advance would have less of an affect, would not require additional bureaucracy and not have schemes designed around the policy. Any flat rate tax should still have the ability to be contested if schemes are unviable as it would be in the interest for the tax to be waived and new housing to be provided in the Island. Affordable Housing - Scheme Deferral Whatever is decided within the planning regime, I would strongly recommend that it is agreed and acknowledged that any new system will not take place for 12 months after the Island Plan is implemented. This will allow current sites and schemes to be considered providing necessary housing and also economic stimulation. If developers are concerned that they may be affected by a policy which they do not know in advance, they would inevitably take a cautious line until the policy is determined. Effectively, the market will stall and the pipeline of housing will stop from such schemes. In any event, we were informed at the meeting that it is envisaged that the affordable homes policy would take time to filter through and as such a referral of 12 months would seem to accord with this policy, but at the same time, give a signal to developers. I would also raise the concern of bankers who would be unwilling to lend on schemes with such risk having been flagged by values.	the incentives for developers to provide such windfall. v) It could potentially provide affordable housing in inappropriate prime locations which would be a poor use of resources. This could also affect the value of the open market housing within the scheme, further reducing the viability and site value. vi) It could affect the design of scheme as plans are drawn to reduce the impact of the policy rather than maximize the site's potential. vii) It could complicate schemes as specifications, layouts and facilities are tailored between the different types of accommodation (e.g. reduce specification of kitchens, bathrooms etc, reducing economies of scale and increasing costs of building). viii) It requires a new process to be created and monitored analysing the cost and viability of schemes. ix) As the policy could start from as low as two units, it could provide a particularly heavy burden on small developers and existing owners. Effective Affordable Homes on Site Values I have undertaken a basic analysis of the reduction in site values due to the request for 40% affordable homes. Each site will vary as would the type of affordable home, but it maybe worth noting that on our estimates a site value reduction of a minimum of 30%, probably much more, is easily possible. Accordingly, it is clear to see why some sites would no longer be viable with this provision and whilst the incentive to convert sites would be materially reduced.	of its own property portfolio to provide affordable housing, should the existing proposed measures fail to deliver the required numbers		
DP262		Mr Mike Waddington		Policy H 3	Affordable Housing	Objecting	Affordable Homes However, the Draft Island Plan is contradictory aswell 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: 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		The comment s 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		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.

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							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?		(particularly St Helier) could prevent the regeneration of St Helier.		
DP415		Mr Marc Burton	Institute of Directors	Policy H 3	Affordable Housing	Objecting	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	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; The 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	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.		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.
DP546		Mr Paul Harding	The Association of Jersey Architects	Policy H 3	Affordable Housing	Objecting	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	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	Noted	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%

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			ts				submission), funding and implementing servicing of the land, then selling on the sites for affordable housing to developers who will build on them.	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 homes comprise social housing as the mixing of social and private housing is known to be problematic. The AJA would like to point out this Policy is seeking to place a levy on expensive land, rather than controlling the value enhancement of cheaper land.		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.	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.
DP582		Deputy John Le Fondre		Policy H 3	Affordable Housing	Objecting	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

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											homes and above.
DP610		Mr Bruce Willing		Policy H 3	Affordable Housing	Objecting	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.	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: 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.) 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.	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.	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 to 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	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.
DP619		Mr Paul Bradbury	States of Jersey	Policy H 3	Affordable Housing	Neither		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 -	Noted. The comment on viability is understood, and the policy will in all likelihood be amended to make it less onerous.		Amend the policy so that it is less onerous as far as viability is concerned

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								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.			
DP658		Mr Mark Le Boutillier	GR Langlois	Policy H 3	Affordable Housing	Objecting	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.
DP663		Mr Martin Clancy	Dandara	Policy H 3	Affordable Housing	Objecting	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.	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	The comments are noted, and in particular those on viability and the disincentive to landowners.	A 5%-10% proportion of affordable housing on market sites will not, of itself, deliver sufficient affordable homes to meet the 10 year target	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.



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								<p>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 implementation. Items that will need consideration prior to introducing a policy:</p> <ol style="list-style-type: none"> <li>1. Is there a demand for the affordable properties.</li> <li>2. Who will take on the properties and where will the finance come from.</li> <li>3. Are Housing Trusts an acceptable social housing provider any longer, or does the Housing Department want to control everything.</li> <li>4. At what price levels are the affordable sold at.</li> <li>5. A feasibility mechanism in place to justify a reduction in the amount of affordability on a site, i.e. there maybe a site that the States Planning Department may wish to see developed for housing, a feasibility would be required to show its current use value makes it undevelopable under the current percentage requirement, and thus the percentage maybe reduced of affordable percentage maybe considered appropriate to allow the scheme to commence.</li> <li>6. A valuation mechanism to allow the transfer of "social units" from one site to another or indeed a payment to wards a "social fund" if little or no social units are planned on a site.</li> <li>7. In order to protect the countryside consider housing higher levels of affordable housing in the rural areas.</li> <li>8. Maybe consider a reduction in Percentage for Art costs and Planning and Building fees which have risen considerably in recent years.</li> <li>9. Stop the implementation of the new environment code for sustainable homes policy which will increase the build costs substantially.</li> <li>10. Consider a 1 year holiday after the introduction to allow for a valuation in the residential land market to "allow" for the</li> </ol>			

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								affordable content. 11. All rezoned green/glasshouses land to have 100% social content, or 50% social and 50% shared equity. I do hope you find my comments useful, please contact me if you wish to discuss these issues further.			
DP684		Dr Stephen Izatt	Waterfront Enterprise Board Limited	Policy H3	Affordable Housing	Objecting	<p>I write following our recent meeting and your request for a written response from the Waterfront Enterprise Board Limited ("WEB") in respect of the White Paper Draft Island Plan ("the Plan") Policy H3 Affordable housing. Under the Plan, development is to be concentrated on brownfield sites in accordance with the objective of the States of Jersey Strategic Plan to "identify sufficient appropriate development sites for housing - without further rezoning of green areas". The Plan further states that "the provision of new homes during the Plan period will provide the mechanism to lead urban regeneration, particularly in St Helier" (paragraph 6.5). WEB is concerned that as a result of the significant proportion of affordable housing that will be required in new housing schemes under the mechanism proposed; limited development on brownfield sites will take place. As a result, not only will the delivery of affordable housing be impacted but the supply of category B homes will be significantly reduced. Background It is appreciated that Category A Housing includes Social, First Time Buyer, Shared Equity and Over 55's housing and there will be different land values associated with each. As a rule of thumb, for example, the rental income from social housing can only service the construction costs of a unit of housing and therefore the land upon which social housing is built has a zero value. As over 55 housing can be sold on the open market to any person over the age of 55, the land value for a 2/3 bedroom house could be circa £200,000. The Plan however does not state the proportion of Social, First Time Buyer, Shared Equity and Over 55's housing within the Category A Housing bracket and it is therefore not possible to accurately assess the average land residual value for Category A development. Without detailing out the proportion in the Plan, landowners and developers will focus on First Time Buyer and Over 55 housing as these deliver the highest returns; this may not however match the need. I enclose a spreadsheet that illustrates the significant differences in land values within the Category A housing class. The 2002 Island Plan rezoned a number of sites for Category A Housing and I believe that it was Senator Ozouf who recommended the introduction of the 45:55 split whereby 45% of a site would be used for the</p>		The comments of WEB are well argued and are noted.	<p>1) There are concerns that Policy H3 could discourage landowners bringing their sites into development. The Minister is likely to reduce the proportion to 20% and the threshold site size to 10 homes and above. He may also defer policy H3 for 12 months to allow sites on which values have already been agreed to clear the planning application system. 2) The mix of Category A units provided in the affordable housing provision will be included in Supplementary Planning Guidance - probably updated on a bi-annual basis. 3) The reduction in units will arise predominantly from re-vamping of Housing Dept. sites - in particular improving housing quality by merging bedsits into one bedroom flats, and small one bedroom flats into two bedroom flats. 4) the supply side of affordable housing units indicates that there is 10-year requirement for about 1000 units- approximately 25% of total demand. Table 6.2 indicates that policy H3 will deliver 200 units in years 1-5 and 400 units in years 6-10 (from Windfall and Town 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. 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.</p>

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							<p>provision of social housing and 55% for first time buyers. It was made clear to developers that the government would not be purchasing any of the social housing units and that the Housing Trusts could only afford a purchase price equivalent to the capitalised social rents and not at the first time buyer prices that the developers wanted. There was to be no government subsidy for the provision of new social housing stock. This policy worked on these sites as they were green fields which, prior to the 2002 Island Plan, only had an agricultural value. The land value for the first time buyer plots, albeit only 55% of the total site, was still higher than the agricultural value and therefore development proceeded. WEB questions supply The need for affordable housing to be developed is recognised and the fact that there will be no government funding is acknowledged. In terms of demand, paragraph 6.92 identifies, albeit at a high level, 600 affordable units are needed in the first five years of the Plan. Paragraph 6.92 identifies that a detailed demand study will be required to more accurately assess the need. The Plan sets out that 550 units can be delivered in the first 5 years of the Plan (Table 6.2). However, there is delivery of 850 new units less 300 "outworn sites". Outworn sites are described in paragraph 6.50 as follows:- "It is estimated that during the Plan period there is likely to be a loss of the total number of housing units associated with the planned re-development and upgrading of old outworn housing estates: these are generally owned and managed by the States of Jersey Housing Department. It is estimated that this will result in a net reduction of 300 homes." WEB questions the above description as to why there will be a reduction in the number of Category A units unless the sites that are owned by the States of Jersey are to be developed for Category B units or are to be left undeveloped. The recent phased redevelopment of Les Squez housing estate for example did not result in a reduction of the category A stock as no refurbished units were converted to Category B housing and the site was not to be left undeveloped in perpetuity. Assuming WEB is correct in its above assumption, the Plan therefore proposes 850 new units of Category A Housing are provided in the first 5 years of the Plan against an assessed demand for 600 units. Of the 850 new units a total of 650 affordable homes are to be provided on greenfield sites (225 on new greenfield sites set out in the Plan, 125 from the 2002 Island Plan H2 sites and 300 from the amended 2002 Island Plan). It is considered that as</p>				

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							<p>these developments are to take place on greenfield sites, these 650 units will be capable of delivery without any financial assistance from government and therefore should be delivered. Table 6.2 illustrated that in the first 5 years of the Plan 200 units are required to be provided on brownfield sites via the affordable housing mechanism and 400 units in the second 5 years of the Plan. However, assuming the 40% affordable housing mechanism, and assuming this mechanism worked, a total of 880 additional affordable units would be provided in the first 5 years of the Plan <math>((2000+200) \times 40\%)</math> and 800 in the second 5 years of the Plan <math>((1,600+400) \times 40\%)</math>. These delivery figures significantly exceed the demand (total affordable demand =1,200 units: total affordable supply =2,405 units). WEB questions this significant over supply of affordable units. WEB concerns with mechanism Ultimately, developers will not be prepared to fund affordable housing out of their developer's profit and, as a result, it will be the land value that will have to be reduced in order for development to proceed. The 40% proportion of affordable housing proposed on all developments will dramatically reduce the value of all land on the Island. This carries two main issues:- 1) The Plan proposes that the majority of new residential development should take place on brownfield sites. Brownfield is defined as land that has a previous use. A landowner will therefore only be prepared to sell his land to a developer where the residual land value that the developer is prepared to pay is greater than the value of the current activity taking place on that site. 2) The States of Jersey is the single largest landowner on Jersey and under its current proposals to form States of Jersey Development Company is considering developing its land assets that are not required for the provision of public services. The proposed mechanism will dramatically reduce the value of the States of Jersey land holdings and may result in sites that require significant infrastructure having a negative site value and therefore only being capable of development with a States subsidy. It is considered that the 40% requirement for affordable housing will have a significant negative impact on end values which will filter down to significant reductions in land values. The overall effect will undoubtedly be that a number of brownfield development sites that are needed to be developed in order to deliver category B homes will be impacted by this proposal as the site residual values will be lower than existing use values. The result will</p>				

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							<p>be these brownfield sites will not be sold for development and there will be a significant reduction in the supply of Category B properties. The risk that this mechanism may have a negative impact in bringing forward development has been identified in paragraph 6.109 of the Plan which states "it will be necessary to agree a realistic proportion within the target percentage". The practicalities of negotiating a reduced contribution between Planning and Environment, Property Holdings, a Developer and a Landowner will without doubt frustrate and seriously delay the development process. A developer will also be unlikely to finance the considerable pre-development costs with the uncertainty surrounding this significant expense. WEB also questions why the development of a single unit of housing should escape from contributing towards affordable housing. Most single unit developments are on windfall sites that could contribute financially towards affordable housing. WEB suggestion It is WEB's view that there is an alternative mechanism which should be applied to all new residential development regardless of the number of units. The proposal is for a commuted affordable housing sum to be paid to the States of Jersey on completion of construction and before any occupation based on the sales value of the development. Attached is an appraisal of the WEB proposal illustrating the impact on land value together with a comparison against the Plan proposed mechanism. The WEB proposal has the benefits of being equitable, easily calculated, provides certainty for Developers and Landowners, and should be financially afforded by development on brownfield sites that do not require significant public infrastructure. WEB considers that the policy as proposed under the Plan carries the risk of deferring the much needed and relied upon development of brownfield sites. Any significant reduction in the delivery of new housing units will once again fuel large increases in property prices as it did in 1998 and will have the negative effect of resulting in the widening of the financial and economic divide between home owners and non-home owners.</p>				
DP693		Mr Andrew Fleet	Style Group Ltd	Policy H 3	Affordable Housing	Objecting	<p>I. Item 6.92, referring to the Macdonald report states that the latent demand demonstrated in the 2007 Housing Needs Survey and taking into account anticipated sources of supply of other Category A homes to arrive at an interim indicator of need for affordable homes, of 600 units of accommodation over a five year period. This represents 15% of the</p>		The Style Group's comments are noted	Most of the Category A houses provided in the first 5 years will come from sites already designated, or proposed for that purpose. It is anticipated that the policy H3 will need to deliver	The Minister is likely to reduce the proportion to 12.5% and the threshold site size to 8 homes and above. He may



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							<p>overall housing requirement, why therefore has the proposed requirement been set at 40%? 2. The UK requirement is set at 35% with a trigger level of sites of 15 units or more, why is Jersey requiring 40% and a trigger level of sites of 2 units or more? 3. Item 6.96 requires the viability of any policy for affordable housing not to deter land owners from placing sites on the market or developers from developing market housing; any requirement for affordable housing on sites of below 5 units will significantly affect the viability of the site, thus creating a natural reluctance for new sites coming to the market place. Evidence shows that this reluctance happened to a number of H2 sites from the 2002 Island Plan. 4. Due to the character and size of the Island, many new sites , particularly windfall sites are likely to be 5 units or less. This reduction of sites coming to the market place as referred to in item 3 above will reduce the volume of house building, causing a reduction in housing supply. 5. This potential reduction in housing supply will create the corresponding increase in demand, consequently creating an increase in house price. This increase in house price will inevitably increase the gap of affordability for Islanders accentuating the problem of the lack of affordable housing in Jersey . The proposed policy potentially has the effect of accentuating the problem, not easing the problem. 6. Item 6.97 proposes the introduction of the submission of a viability assessment with the planning application; this will not work; to submit a financial viability assessment with the planning application is too late as the site would have already been acquired at a pre-determined value. It can not be the role of the Planning Authority to dictate the viability of a project. 7. Item 6.97 also states the viability assessment model is being developed by the Minister in consultation with the development industry operating in Jersey. We question which parts of the development industry are being consulted on the viability assessment as we have not been consulted? 8. Item 6.98 suggests that the decision on viability can be discretionary and subject to negotiation - this is at risk of being abused and bringing a policy into disrepute. 9. Item 6.99 states the viability assessment model will be adopted and issued as supplementary planning guidance. Surely it must form part of this consultation process to be considered correctly in conjunction with the Policy on affordable housing. 10. Items 6.100 and 6.101 state that the value of a commuted sum will equate to the difference in value between an affordable home and a market</p>			<p>between 600-650 homes over the ten year plan period - i.e.. about 65 a year. The Minister is likely to reduce the proportion to 12.5% and the threshold site size to 8 homes and above. He may also defer policy H3 for 12 months to allow sites on which values have already been agreed to clear the planning application system</p>	<p>also defer policy H3 for 12 months to allow sites on which values have already been agreed to clear the planning application system. Supplementary Planning Guidance will need to be issued, probably bi-annually, to determine the mix of Category A Homes</p>

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							<p>home of the same type. How is the value of both the affordable home and a market home established in the many varied locations on the Island? What happens in the inevitable dispute on market values? 11. The requirement to mix Category B and affordable houses on developments of 6 units or more, will only serve to devalue the Category B houses and will make the development of windfall sites less attractive to developers. In addition, it will create a two tier system of housing developments, whereby privately owned homes will subsidize the adjacent affordable homes. 12. Item 6.106 places a reliance on private sector 'windfall' development, both within St. Helier and in other parts of the Built-up Area. It also states 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. Item 6.109 recognizes by definition that 'windfall' developments are previously developed sites that currently hold a residual value. The requirement to now provide 40% of this previously developed site as affordable housing, or as a commuted sum, can never be viable on small sites as the residual value cannot be reduced. It is likely to result in the 'windfall' sites remaining unsold and undeveloped. 13. Within the Draft Island Plan, Policy EI provides for the protection of employment land; it requires that evidence must be provided to support any change of use including proper marketing of the site for 12 months to demonstrate that the use, no longer exists. This policy as drafted will prevent many employment sites (brown field sites) coming forward as windfall sites, further exacerbating the problem. 14. Item 6.107 states that a commuted sum can be applied for sites of less than 5 units; if the policy is adopted any commuted sum can only be made where the end use of the sum is identified for a specific affordable housing site. It can not be allowed to disappear into States funds as a form of development land tax. 15. Item 6.1 12 describes the varied tenure of affordable housing that will be applied to developments; this is unworkable as the values of social rented, Jersey homebuy, first time buyer or life long homes will vary and therefore the viability of each site will vary. Therefore to state that the tenure of all proposed affordable housing shall be determined by the Minister, based on current housing need is unworkable when a site has been acquired at a pre-determined land value, it is impossible to factor in uncertainty. 16. The proposed policy is likely to have a far reaching</p>				

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							effect on the ability of first time buyers to acquire the first home on the Island created by an increase in the price of all new open market homes to subsidize all affordable homes in an effort to provide a viable development site. 17. We do not believe that derived targets are the answer to delivering affordable housing that the Island needs. The failure of the current target led system in the UK is completely illustrated by the fact that the delivery of new affordable housing has halved under the Labour Government in the UK.				
DP711		Caroline Harrington	The Jersey Construction Council	Policy H 3	Affordable Housing	Objecting	<p>The Jersey Construction Council object to the proposed Draft Island Plan Policy H3 Affordable Housing and raise the following important questions and issues regarding the proposal. Whilst there are positive signs of the economy beginning to recover consumer spending will take time to return to pre 2008 levels. All these factors point to a slow recovery from recession for the property market with no 'boom time' housing completion levels to replenish housing forecasts within the foreseeable future. There is a saying that the worst possible things happen at the worst possible moment. This is certainly true for the impact caused by the reduced viability of housing projects. This began before the recession, but had been masked by the successful boom years. If true, the 'austerity circumstances' in which we now find ourselves combined with reduced viability and reduced sales value will act as a considerable disincentive for investment in housing projects. Project viability is predicted to be the post recessionary period's most important issue, and will undoubtedly be made more difficult by the introduction of a 'tax' on development. Even before the current recession, many developers were concerned that their sites would become unviable unless there was some relaxation or deferment in new building regulations, percentage for art and eco-standards. With the proposed introduction of affordable housing the cost of meeting many of these requirements relies on ever increasing house prices and static land values this will now render many housing projects unviable. The fear is that the increased burden on landowners and housing providers will mean that they have little or no incentive to release land or build new homes on the scale necessary resulting in a reduction of new homes to the Island. The following specific issues relating to the proposed Affordable Housing Policy require debate and further detailed consideration:-</p> <p>1. Item 6.92, referring to the Macdonald report states that the latent demand demonstrated in the 2007 Housing</p>		The comments of the Jersey Construction Council are valued and noted	<p>1) Most of the Category A houses provided in the first 5 years will come from sites already designated, or proposed for that purpose. It is anticipated that the policy H3 will need to deliver between 600-650 homes over the ten year plan period - i.e.. about 65 a year. The Minister is likely to reduce the proportion of affordable housing to 20% and the threshold site size to 10 homes and above. He may also defer policy H3 for 12 months to allow sites on which values have already been agreed to clear the planning application system. 2) The plan allows for a viability assessment to be undertaken to ensure that the proportion of affordable housing delivered within the target figure does not render a development unviable 3) The Department recognises the potential for landowners to withhold sites if Policy H3 is not operated sensitively.</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. 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.

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							Needs Survey and taking into account anticipated sources of supply of other Category A homes to arrive at an interim indicator of need for affordable homes, of 600 units of accommodation over a five year period. This represents 15% of the overall housing requirement, why therefore has the proposed requirement been set at 40%? 2. The UK requirement is set at 35% with a trigger level of sites of 15 units or more, why is Jersey requiring 40% and a trigger level of sites of 2 units or more? 3. Item 6.96 requires the viability of any policy for affordable housing not to deter land owners from placing sites on the market or developers from developing market housing; any requirement for affordable housing on sites of below 5 units will significantly affect the viability of the site, thus creating a natural reluctance for new sites coming to the market place. Evidence shows that this reluctance happened to a number of H2 sites from the 2002 Island Plan. 4. Due to the character and size of the Island, many new sites, particularly windfall sites are likely to be 5 units or less. This reduction of sites coming to the market place as referred to in item 3 above will reduce the volume of house building, causing a reduction in housing supply. 5. This potential reduction in housing supply will create the corresponding increase in demand, consequently creating an increase in house price. This increase in house prices will inevitably increase the gap of affordability for Islanders accentuating the problem of the lack of affordable housing in Jersey. The proposed policy potentially has the effect of accentuating the problem, not easing the problem. 6. Item 6.97 proposes the introduction of the submission of a viability assessment with the planning application; this will not work; to submit a financial viability assessment with the planning application is too late as the site would have already been acquired at a pre-determined value. It can not be the role of the Planning Authority to dictate the viability of a project. 7. Item 6.97 also states the viability assessment model is being developed by the Minister in consultation with the development industry operating in Jersey. We question which parts of the development industry are being consulted on the viability assessment as we have not been consulted? 8. Item 6.98 suggests that the decision on viability can be discretionary and subject to negotiation - this is at risk of being abused and bringing a policy into disrepute. 9. Item 6.99 states the viability assessment model will be adopted and issued as supplementary planning guidance. Surely it must form part of this				

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							<p>consultation process to be considered correctly in conjunction with the Policy on affordable housing. 10. Items 6.100 and 6.101 state that the value of a commuted sum will equate to the difference in value between an affordable home and a market home of the same type. How is the value of both the affordable home and a market home established in the many varied locations on the Island? What happens in the inevitable dispute on market values? 11. The requirement to mix Category B and affordable houses on developments of 6 units or more, will only serve to devalue the Category B houses and will make the development of windfall sites less attractive to developers. In addition, it will create a two tier system of housing developments, whereby privately owned homes will subsidize the adjacent affordable homes. 12. Item 6.106 places a reliance on private sector 'windfall' development, both within St. Helier and in other parts of the Built-up Area. It also states 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. Item 6.109 recognizes by definition that 'windfall' developments are previously developed sites that currently hold a residual value. The requirement to now provide 40% of this previously developed site as affordable housing, or as a commuted sum, can never be viable on small sites as the residual value cannot be reduced. It is likely to result in the 'windfall' sites remaining unsold and undeveloped. 13. Within the Draft Island Plan, Policy E1 provides for the protection of employment land; it requires that evidence must be provided to support any change of use including proper marketing of the site for 12 months to demonstrate that the use, no longer exists. This policy as drafted will prevent many employment sites (brown field sites) coming forward as windfall sites, further exacerbating the problem. 14. Item 6.107 states that a commuted sum can be applied for sites of less than 5 units; if the policy is adopted any commuted sum can only be made where the end use of the sum is identified for a specific affordable housing site. It can not be allowed to disappear into States funds as a form of development land tax. 15. Item 6.112 describes the varied tenure of affordable housing that will be applied to developments; this is unworkable as the values of social rented, Jersey homebuy, first time buyer or life long homes will vary and therefore the viability of each site will vary. Therefore to state that the tenure of all proposed affordable housing</p>				



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							shall be determined by the Minister, based on current housing need is unworkable when a site has been acquired at a pre-determined land value, it is impossible to factor in uncertainty. 16. The proposed policy is likely to have a far reaching effect on the ability of first time buyers to acquire their first home on the Island created by an increase in the price of all new open market homes to subsidize all affordable homes in an effort to provide a viable development site. 17. We do not believe that derived targets are the answer to delivering affordable housing that the Island needs. The failure of the current target led system in the UK is completely illustrated by the fact that the delivery of new affordable housing has halved under the Labour Government in the UK. 18. In any affordable housing policy, it must maintain some degree of flexibility to ensure that it remains workable; therefore we suggest that the policy contains a mechanism to allow the affordable housing provision to be transferred to an alternative development. In addition the policy must contain a period of transition to allow the land market to adjust to make allowances for the imposed affordable content and to allow land acquired at full value prior to the introduction of the policy to be developed without affordable housing. Conclusion The introduction of affordable housing at this difficult time in the economy is likely to reduce the number of new homes constructed, increasing the demand, increasing the price and reducing the affordability for the first time buyer. Therefore the proposed policy of affordable housing will have the immediate effect of reducing affordable housing to the Island and will not achieve its objective of increasing the level. A radical re-think to the entire proposition is required.				
DP746		Paul Harding	The Association of Jersey Architects	Policy H 3	Affordable Housing	Objecting	10.11 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. 10.12 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		The comments of the AJA are 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	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

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							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. 10.13 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. 10.14 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 homes comprise social housing as the mixing of social and private housing is known to be problematic. 10.15 The AJA would like to point out this Policy is seeking to place a levy on expensive land, rather than controlling the value enhancement of cheaper land. 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 above, funding and implementing servicing of the land, then selling on the sites for affordable housing to developers who will build on them.			affordable housing should the proposed policies fail.	be made in the form of a commuted sum payment to enable the delivery of affordable homes off-site, elsewhere.
DP774	Mr Michael Stein	Mr Michael Stein	MSPlanning Ltd	Policy H 3	Affordable Housing	Objecting	Please find enclosed a report prepared by Pioneer, a specialist UK 'Housing and Development' consultancy with expertise in the subject of affordable housing and housing market analysis. The report was commissioned by this practice to seek an objective view on the matter of affordable housing, as proposed by Policy H3 in the White Paper relating to the Review of the Island Plan. The report's findings reinforce our concerns for the community of the island for the following reasons: Housing sites on brownfield sites will be less likely to be released for any housing (let alone affordable		The comments of MSP and the report of Pioneer, are both useful and noted. It is informati	The comment effectively advocates the existing method of procuring affordable housing by designating low value land specifically for this purpose, which has proved a particularly effective under the 2002 Island Plan, as an alternative to Policy H3. This would necessitate identifying sufficient low value land (either green field or glasshouse sites) to	The potential loss of 3 of the sites proposed in Policy H1 will necessitate finding suitable new sites to replace them

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							housing). Insufficient land has been re-zoned to enable affordable housing (glasshouse sites represent a limited opportunity to provide affordable housing - but apart from De La Mare Nurseries, Grouville and Samares Nurseries, St Clement, none have been re-zoned). Because of the quantum of affordable housing required for Cat A sites and windfall sites, landowners will be considerably less willing to release the land. The thresholds need to be reduced The conditions local to Jersey make the notion of delivering affordable housing on windfall sites even more difficult (ie small size of sites, landowner's expectation of value, the number of historic buildings, conservation areas and archaeological sites in town, the recent emphasis on the need for "spacious" development. This lack of supply will simply push up existing house prices even more, therefore out of the range of local people forcing locals, and in particular young families, out of the island. This is in direct conflict with the strategic aim of encouraging young people and families to reside on the island to help address the ageing population issue. Of equal concern is the finding that the basis on which the housing policies have been framed (specifically the basis on which housing need has been calculated) has been inadequately researched and this therefore requires further work before any of the housing policies can be adopted. We trust that you agree that the report is constructive in that it recommends modifications, albeit these do involve wholesale changes to the policies. I can confirm that we are very keen these matters are robustly considered at the forthcoming Inquiry and it is our intention that Mr Parker will attend to contribute to the debate. However, should you wish to discuss any of these matters in advance of the public examination, please do not hesitate to contact me.		ve to know how housing requirements are calculated in the UK, but not necessarily relevant in Jersey, which is a single market area.	accommodate the target number of homes to be delivered by Policy H3 (600-650). This would necessitate designating green-field and former glasshouse sites for development, which has proved unacceptable to the public at large, particularly in those Parishes which are best placed to provide it in accordance with the Plan's Spatial Strategy. The Minister has assured the Constables of the parishes that he will not propose the development of sites for affordable housing against the wishes of the relevant Constable. The potential loss of 3 of the sites proposed in Policy H1 will necessitate finding suitable new sites to replace them	
DP786		Senator Terry Le Main	States of Jersey Housing Department	Policy H 3	Affordable Housing	Neither	Paragraph 6.107 Commuted Sums The arrangements around the option to commute affordable housing requirements on a site by site basis are unclear. Carrying out site assessments and calculating the level of commuted payments will inevitably create a resource issue and will lead to some increased bureaucracy. Such issues are likely to be contentious and so the process of assessment must be both credible and robust. I would be concerned that such assessments and negotiations might delay developments further than they are already. It is not clear who will be carrying out that work, however, if the work is to fall upon a States Department then it needs careful thought, particularly at a time when our Departments are		The Housing Minister's comments are noted.	Arrangements for commuted payments, and the level at which they are set will be included in supplementary planning guidance as stated in the draft Island Plan.	Noted by the Minister

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							under pressure to cut costs Where will commuted payments go? Presumably they will be ring-fenced for 'affordable housing use' in the same way as we ring fenced any income from the bonds held against Jersey Homebuy properties. That could imply that the commuted sum payments should be added to the same pot and administered by the Housing Department and utilised to provide new affordable housing. That in itself is fine, provided that there is sufficient land available to create that new affordable housing. In the absence of available land in a developable state the outcome of developers making commuted payments would simply be a growing financial surplus with no means of utilising it whilst waiting lists for affordable housing continue to grow.				
DP859		Gerald Fletcher	Jersey Hospitality Association	Policy H 3	Affordable Housing	Objecting	Sites and buildings that are used for tourism-related purposes will also be exempt from the provisions of this policy.	The other damaging policy is Policy H3 requiring the provision of affordable housing from all residential development sites of two houses or more. Because, the tourism industry needs to be responsive to constantly changing circumstances it is essential that it is able to call on this funding when the market's expectations require it, otherwise the product will rapidly become out of date and, equally rapidly, become economically unviable. In relation to Policy H3, it is recommended that an exception be made in relation to sites that are used for tourism-related purposes, in order that the underlying land values that are critical to investment in the industry are not eroded. An addition would be made at the end of the Policy as follows, indicated in Bold text: 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. The Minister will require a proportion of 40% affordable housing to be provided on sites with the capacity of six or more housing units. Where this applies, affordable housing shall be provided on the site for which permission is sought unless one or more of the following circumstances apply: 1. that the provision of affordable housing on the site would make that development unviable; 2. that the site is of such a size or nature that the contribution to affordable housing would be maximized by allowing high-quality market housing to occupy that site and for the contribution to affordable housing to be in the	The comment is noted, but the policy is intended to operate across all sectors		The Minister is not prepared to recommend this change to Policy H3

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								form of a commuted payment, to support the delivery and/or procurement of affordable housing elsewhere; 3. affordable housing is best provided through the mechanism of a site-swap using sites within the ownership and control of the applicant; 4. the housing units provided in a mixed-use scheme are directly related to and necessary for the operation of that development. On sites with a capacity of two - five housing units, the Minister will require a proportion of 40% affordable housing to be provided through a commuted payment, to support the delivery and/or procurement of affordable housing elsewhere. Alternatively, the affordable housing provision may be made on the site for which permission is sought. The percentage of affordable housing shall be rounded up if the figure thus arrived at contains a proportion of one unit. The provision of housing to meet special requirements; registered lodging accommodation; and staff and key agricultural worker accommodation shall be exempt from the requirements of this policy. Sites and buildings that are used for tourism-related purposes will also be exempt from the provisions of this policy.			
DP947		Mr James Godfrey	Royal Jersey Agricultural & Horticultural Society	Policy H 3	Affordable Housing	Neither	First time buyers: This issue is a complex one which is heavily influenced by factors other than planning and it is suggested that studies should be published on the record of first time buyer provision in Jersey before a 'predict & provide' solution is adopted. The principle of informed decision making should not be put aside when it comes to this issue, the notion that simply increasing supply will improve affordability does not necessarily apply.		The comments of the RJA&HS are noted.	It is intended that the establishment of the Affordable Housing Gateway will enable the quantum and mix of affordable housing to be established more accurately.	Noted by the Minister
DP583		Deputy John Le Fondre			Housing Mix	Neither	Ref para 6.118 Housing Mix - whilst very much a personal view, provided there are good internal spatial standards, and good amenity space, should we distinguish between 3 bed houses and 3 bed flats ? Everyone would like a house with a garden in the countryside. That is not realistic and should not be identified as 'need' if land can be utilised in a more efficient manner.		Noted and agreed		Noted by the Minister
DP161		Mr Stephen de Gruchy		Policy H 4	Housing Mix	Supporting			Noted		Noted by the Minister
DP889		Bill Sarre	CBRE	Policy H 4	Housing Mix	Neither	One of the common areas of shortage is family homes whereas the general pressures on land suggests more use of apartments. To partially accommodate this, I have two proposals on housing types which maybe worth consideration: i) Within blocks of apartments, it maybe worth considering two storey duplexes at ground floor level which		Mr Sarre's comments are noted and supported		Noted by the Minister



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							would act as quasi houses with ground floor gardens and first floor bedrooms. Additional apartments could be built above, but in terms of the mix of the scheme, more family accommodation would be provided. ii) Three bedroom flats are generally not popular with developers, but a provision of more of these would assist with families seeking a second bedroom for children. I would recommend that a provision of three bedroom apartment is general an area as close to facilities, but a blend within schemes could be considered.		d		
DP13		Mr Howard		Policy H 5	Housing in Rural Centres	Objecting	I view this proposal with some disquiet - either the new Green Zone is protected by the Island Plan or it is not. The inference here is that local needs will be allowed to override the new protections. Parish "democracy" is at times somewhat tenuous and votes at Parish assemblies notoriously passed with a handful of attendees. Just because the Parish wants a development (probably on the cheap on the nearest handy piece of rough grazing) doesn't mean it should necessarily be allowed. This proposal seems to imply that the Planning Minister can abrogate his responsibilities to the Green Zone because the Parish wants a new development. The recent over 55 re-zoning was supposedly "parish-led" but was voted through by the whole States assembly. This proposal appears to remove that overriding protection and leaves an opportunity for a determined Parish and a compliant Planning Minister to drive a fairly large coach and horses through the new Green Zone protections. There is also the likelihood of creeping urbanisation into the Green Zone from pre-existing village developments which really should be resisted. I would require, at the very least, the whole States Assembly to vote this kind of proposal through on a case-by-case basis.		Mr Howard's comments are noted	There is a need for housing development in the rural parishes, for young families and for the elderly, principally to maintain the schools, shops and services in the village centres. The Minister has offered to the Parishes the ability to be involved significantly in the preparation of local plans, but ultimately the responsibility will remain with the Minister to approve those plans.	Noted by the Minister
DP162		Mr Stephen de Gruchy		Policy H 5	Housing in Rural Centres	Supporting			Support Noted		Support is noted by the Minister
DP23		Valerie Harding		Policy H 5	Housing in Rural Centres	Objecting	The first paragraph (6.1) of the draft Housing plan states "The home is central to life, providing fundamental human need of shelter. In addition to meeting human desires for comfort, security, privacy, independence and personal identity". This statement can also be applied to existing residential developments particular security and privacy. Any additional large build in any part of the island negates these reasons. Paragraph 6.5 states " t he Plan needs to ensure that homes are provided in the right location to help achieve a more		Reject	The potential to allow small-scale development in support of some rural parish communities to ensure that the amenities and services provided in those parishes, such as the schools, remain viable, would be permitted under the auspices of this policy.	The Minister notes the comments made but is not minded to amend the draft Plan

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							sustainable form and pattern of development in Jersey" . Brownfield sites are not necessarily the right location particularly those in the countryside in small villages such as Carrefour Selous. The words "pattern of development" sounds like a design for a patchwork. quilt. I cannot see how the building of up to 150+ units can "sustain the viability of rural parish communities (Housing objectives item 3). I also do not agree with Housing Indicators item 3 - Amount of new residential development in rural parish communities considered necessary to support viability and vitality" . We live where we live as we like a quiet life. Such words smack of "New" Labour wanting to concrete over the south of England. Have parts of the plan been cribbed from elsewhere? However 6.122 seems to contradict the above re rural development as it states "There is recognition that there is a need to protect the viability and vitality of Jersey's small rural settlements". Rural parish life is unique and important to those living there. More development will not protect rural parishes. The plan sets out the need for 4000 new housing units in the island over the next ten years. Firstly this figure is estimated and perhaps further information should be given to the public as to how this was reached. Who is going to live/buy 4000 units of housing? The figure makes no sense - Jersey is only 45 square miles. Paragraph 6.20 mentions fertility and morbidity (the latter means diseased; sickly - are we going to have a plague? Surely it should read mortality (frequency or number of deaths). Allowing for immigration of 150 per year that is only 1150 individuals over ten years and if each has a new housing unit then there is only a need for 1150 (the size of the individuals family is irrelevant for the purposes of estimating the number of units needed, the size of the family is relevant to the size of the unit i.e. two children three bed roomed unit etc) . This is partly covered in 6.21. 6.26 mentions 1000 households have housing aspirations. We all have housing aspirations but if you cannot afford it you do not buy it . People who have aspirations in life usually work hard and earn to achieve their aspirations or part thereof . The type of housing going to be developed are not mansions. Families living in States rented accommodation whose income is above the threshold would have moved by now if they were "aspired" to do so. They are probably happy living where they do. Social housing is usually built to an inferior quality and standard - another UK development idea - smaller rooms i.e. rabbit hutches. 6.91 says "information on the numbers of				

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							households who are in need of affordable housing is not clear" so why all the rush to build 4000 units over 10 years. 6.59 " ..Land is developed at more efficient and higher densities of development than previously achieved" . The words efficient and higher densities are a contradiction. If the States plan to use the UK density of development then all brownfield sites will eventually have 200+ units of housing which is far to dense anywhere in the island. This is " sink estate" size and could lead to social and neighbourhood problems in a few years. Nothing efficient in this type of build. The current maps of brownfield sites in the Island Plan show one field designated and numbered for initial development but other fields coloured in along side which implies larger development hence the figure of 200+ per site. The development at Goose Green Marsh (to which many Parishioners objected) has 102 units and is like a rabbit warren and a blot on the landscape and this is a private development not a States one. Have the following been taken into account: when reaching a 4000 figure:- local youngsters who attend university in the UK rarely return to live in the island so these should not be included in the estimate. Several people are currently living in the island that are working under a contract and in due course will leave Jersey. More people are living at home with their parents than at any time in the past 30 years. Many local younger couples live in France and commute to work in Jersey. Itinerant immigrants will not stay in the island and could not afford to buy anyway. Many Madierans have homes in their own island and will not be buying property in Jersey. There are a large number of empty properties unsold in the island perhaps the States should ensure these are sold/rented first before developing further into the countryside. Restraint on non-residents being able to buy properties in Jersey as an investment . The mind-set that everyone should own their own home is purely a British concept . Thousands of Europeans live in rented flats . Major problems with waste disposal if large scale developments go ahead in the countryside . The only saving grace is that there will be a five year check on development - hopefully.				
DP435		John Le Maistre	Jersey Farmers Union	Policy H 5	Housing in Rural Centres	Objecting	For the same reasons as our comments on "Proposal 14 - Parish Villages", we regard this as highly dangerous for the Industry. See attached letter		Reject	There has to be a balance between safeguarding agricultural land and providing for the needs of rural villages	Noted by the Minister
DP443		Mr Charles Alluto	The National Trust for Jersey	Policy H 5	Housing in Rural Centres	Neither	It is assumed within the draft plan that allowing small scale development on green field land could be justifiable as a means of helping to sustain Parish life. Before such a policy is adopted it is crucial that		Noted and supported		Noted and supported

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							such assumptions are subject to rigorous examination and consultation. Jersey is an extremely small Island with a very fluid community and buoyant housing market. One therefore has to question whether the demise of rural parish communities is solely due to a lack of appropriate housing or rather reflective of a changing socio-economic structure.				
DP45		Mr David Killip		Policy H 5	Housing in Rural Centres	Supporting	Further to discussions with Mr R Buchholz we support the proposed plan and in particular the proposal that our field No. 236 and the adjacent field No. 237 could be used for housing development if supported by the Parish of St John. David & Glenda Killip	Fields 236 & 237 are close to the village amenities with all mains services available. Development of these two very small fields would not detract from the surrounding area.	Note comment to support plan but reject inclusion of fields for housing.	The proposed sites do not comply with spatial strategy and does not meet with planning Minister's criteria for protecting green fields and open spaces. This includes the extension of the built-up area boundary, into the countryside, to allow for incremental development opportunities. There are, therefore, considered to be no grounds to identify other sources of supply to meet housing needs, including the release of additional greenfield land. Policy H5 (housing in rural areas) supports the provision of new housing as part of village plan proposals put forward by the constable and this is the policy where such housing sites may be considered in the future, provided they are required to support the vitality of the village.	Noted by the Minister
DP653		Conneta ble Silva Yates		Policy H 5	Housing in Rural Centres	Supporting		I write concerning the Draft Island Plan 2009 and confirm my support of this most important document. This plan will not only provide a basis for land-use planning decisions over the next ten years but will crucially set the direction for the sustainable development of the island balancing social, environmental and economic considerations for the long term future beyond the year 2020. The question of social balance in the island is of paramount importance in this plan and I will be supporting in particular Policy H5 "Housing in Rural Centres" and Proposal 14 "Village Plans in order to sustain the viability and vitality of our Rural Communities. We must recognise and react to current trend where because of very high property prices in our rural settlements, our young people have to leave our community in order to find affordable accommodation. The Parish of St Martin in particularly vulnerable in this respect. You will no doubt recall that in July 2009 I circulated a study document entitled "St Martin Village	The Constable's comments are noted and supported		Support is noted by the Minister

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								Regeneration, Community Regeneration, 2010 and Beyond. This was very much a personal view of our progress within the 2002 Island Plan to date, with ideas and possibilities for consideration over a 30 year future time span. In November 2009 I presented a Parishioner Consultation Event where the study document was considered in conjunction with the recently released Draft Island Plan 2009. We had excellent parishioner participation and received over 150 written responses. See Attached letter from Dep J Reed - Minister for Education, Sport & Culture.			
DP695		Mr Andrew Fleet	Style Group Ltd	Policy H 5	Housing in Rural Centres	Objecting	In support of the objective of sustaining the viability of rural parish communities, new housing should be developed in suitable locations which offer a range of community facilities providing good access to jobs, key services and infrastructure. This should be achieved by making effective use of land, existing infrastructure and available public and private investment with the priority for development on all previously developed sites in particular vacant and derelict sites and buildings including employment and agricultural buildings. Additional housing must be identified now from the shortfall predicted on windfall sites to support the viability of the rural parish communities.		Reject	The Department is already working with parishes to identify additional housing sites as part of village plans.	The Minister is not minded to amend the draft Plan
DP834		Mrs Susan Kerley		Policy H 5	Housing in Rural Centres	Neither	I endorse the suggestions and comments made by the National Trust for Jersey on these policies and proposals		Noted		Noted by the Minister
DP946		Mr James Godfrey	Royal Jersey Agricultural & Horticultural Society	Policy H 5	Housing in Rural Centres	Objecting	Settlement plans: There should be no need for settlement plans as the principle should be not to develop new settlements and only develop existing ones within their current area. There are various 'red herrings' put forward to justify settlement development including supporting 'parish life' although there is no evidence that it would or that somehow 'parish life' has remained unchanged to date.		Reject		Noted by the Minister
DP142		Mrs T Syvret			Housing Development within the Built-up Area	Objecting	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	See above	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	Minister minded to support request to remove site from Plan.



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							<p>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 &amp; 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 &amp; States) should be reviewed from when Le Squez was fully populated to give an idea of the issues large numbers of social rented properties in one area can bring. It would appear that access to the site is proposed through only one entrance and exit. La Grande Route de St Clement has insufficient capacity for rush hour traffic at the present time, with the road in a poor state of repair, a very narrow pavement, and poor drainage which results in any pedestrian being soaked by passing cars. The proposed entrance is actually on a slight bend in the road which would be of sufficient significance to produce a hazard to all road users, and insufficient for the volume of traffic that will be channelled through the route. The properties bordering the proposed site include bungalows, the privacy of the occupants of which would be severely compromised if the development were permitted. Most properties in the row bordering the development are of single block construction, which could be at significant risk with the heavy machinery and depth of foundation required to build the proposed dwellings. St Clement is the smallest parish within Jersey, and yet, over the past few years appears to have borne the brunt of larger scale development. Should not the proposal of rezoning of land be proportionate to the size of the overall size of the parish? Has any survey been undertaken to assess the number of dwellings lying empty within the Island. The issue always seems to be one of providing "affordable" housing. Why then do properties stay empty rather than market forces being permitted to allow prices to fall to a level at which prospective buyers are both willing and able to pay. The press is</p>			<p>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 &amp; 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>	

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							continually running adverts for properties available within the Goose Green development and the Spectrum and Waterfront developments - Why? - They are too expensive for what they are! I therefore propose that the Samares Nursery site is at worst, set back as category H4 housing, and subject to full public consultation to rezone should the need arise once existing category H2 AND H3 sites be exhausted. However, given the housing density within the parish of St Clement, and the strain on the infrastructure of any further development, I propose that the site be returned to green field site to be used potentially as recreational space possibly as an extension to FB fields.				
DP163		Mr Stephen de Gruchy		Policy H 6	Housing Developm ent within the Built-up Area	Supporting					Noted by the Minister
DP164		Mr Stephen de Gruchy		Policy H 7	Housing to meet Special Requirem ents	Supporting					Noted by the Minister
DP165		Mr Stephen de Gruchy		Policy H 8	Registered Lodging Accommo dation	Supporting					Noted by the Minister
DP166		Mr Stephen de Gruchy		Policy H 9	Staff and Key Agricultur al Worker Accommo dation	Supporting					Noted by the Minister
DP429		John Le Maistre	Jersey Farmers Union	Policy H 9	Staff and Key Agricultur al Worker Accommo dation	Supporting	We regard this Policy as positive for the Industry.	Our Industry does require on-farm accommodation for our staff and we agree that permission for its provision should be allowed within the new Island Plan.			Support is noted by the Minister
DP477		Mr Charles Alluto	The National Trust for Jersey	Policy H 9	Staff and Key Agricultur al Worker Accommo dation	Objecting	The Trust would like to express reservations regarding the policy for new dwellings in the countryside to house bona fide agriculturalists.	It is unclear as to how this policy will relate to hobby farmers and with further consolidation in the agricultural industry highly likely in the future, the Trust has yet to be convinced of the need for such dwellings. It is also crucial that the occupation restriction applies to those actively and currently involved in the industry, so as to avoid the system being potentially exploited upon the basis of early retirement.	Noted	The National Trust for Jersey's comments are noted. The restriction allows retired farmers to remain in occupation in their homes (usually owned by them).	The Minister notes the comments made but is not minded to amend the draft Plan
DP835		Mrs Susan Kerley		Policy H 9	Staff and Key Agricultur	Objecting	I endorse the suggestions and comments made by the National Trust for Jersey on these policies and proposals		Noted		The Minister notes the objection to this

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					al Worker Accommodation						policy
DP896		Mr Iain Norris		Policy H 9	Staff and Key Agricultural Worker Accommodation	Objecting	Disagree that key agricultural workers should be housed in the Built-up area, these should be on the holding for management and social issues. In addition this would also tie in with Objective TT1 Travel and Transport Objectives: 1) to reduce the need to travel 2) to reduce pollution through travel and lead to improved farm efficiencies.		Policy H9 does not require agricultural workers to reside in the built-up areas, but qualifies the conditions that must be met before allowing such accommodation to be built in the countryside.		Noted by the Minister
DP938		Mr James Godfrey	Royal Jersey Agricultural & Horticultural Society	Policy H 9	Staff and Key Agricultural Worker Accommodation	Neither	Farm accommodation: There should be a differentiation between the need for accommodation for key staff, e.g. farm managers and permanent employees, as opposed to seasonal contract staff as one is making a full time home whilst the other is more itinerant in nature. This does not necessarily mean that quality is different, simply scale and is particularly acute on livestock farms where accommodation needs to be adjacent to the unit and retaining suitable key staff is challenging.		The comments are noted	The issues raised in the comment are considered when a planning application is made for agricultural accommodation	Noted by the Minister
DP167		Mr Stephen de Gruchy		Policy H 10	Conversion to Flats	Supporting					Noted by the Minister
DP478		Mr Charles Alluto	The National Trust for Jersey	Policy H 10	Conversion to Flats	Objecting	The Trust would request that where relevant this policy also accords with Policy HE1.		Accepted. Policy HE1 applies in all cases where relevant		Noted by the Minister
DP836		Mrs Susan Kerley		Policy H 10	Conversion to Flats	Objecting	I endorse the suggestions and comments made by the National Trust for Jersey on these policies and proposals		Noted		The Minister notes the objection to this

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											policy
DP168		Mr Stephen de Gruchy		Policy H 11	Loss of Housing Units	Supporting					Noted by the Minister
<b>Social, Community &amp; Open Space</b>											
DP169		Mr Stephen de Gruchy		Objective SCO 1	Social, Community and Open Space	Supporting			Noted	Noted	Support is noted by the Minister
DP547		Mr Paul Harding	The Association of Jersey Architects		Education Facilities	Objecting	The 2009 Draft Plan, although mentioning the current review of longerterm ESC property requirements, does not take account the current educational circumstances and by preceding the ESC property review cannot incorporate what might be substantial sites becoming available for uses such as housing. This is another reason why we view the 2009 Draft Plan as being somewhat premature.	The 2009 Draft Plan premise there are deficiencies in provision of education facilities with the Island is seriously flawed. We believe the requirement for educational facilities has reduced in proportion to reduction of children within the Island, following on from birth?rate reduction over preceding years. It is only higher education at Highlands College that is experiencing increased levels of demand. It is therefore possible the Comprehensive Spending Review will conclude the Island has surplus primary and secondary educational facilities that can be rationalised, resulting with educational sites being released for other uses.	Reject	The premise of the objection, related to the potential for falling school rolls and rationalisation of education provision, is noted, but rejected on the basis that the policy does not preclude the redevelopment of existing educational sites where it can be demonstrated that they are no longer required for educational purposes.	The Minister is not minded to amend the draft Plan
DP170		Mr Stephen de Gruchy		Policy SCO 1	Education al Facilities	Supporting			Noted	Noted	Support is noted by the Minister
DP584		Deputy John Le Fondre		Policy SCO 1	Education al Facilities	Neither	Safeguarding of sites - d'Hautree, and St Saviour's Hospital I have obviously had experience of these 2 sites from a Property Holdings perspective, however this is a personal observation. To me there appears to be an inconsistency between the approach of SCO 1 and SCO 2. St Saviour's Hospital has been zoned as built up area, but with the proviso that it would only be released for (say) housing if it can be demonstrated that it is no longer required for healthcare purposes. This seems a reasonable approach, as there would be no need to rezone the site if this was achieved. However, the d'Hautrée site is specifically zoned as safeguarded for Educational purposes. It has a separate zoning definition on the Island Plan proposals map. To me it would be consistent to zone this as built up area, but to keep it conditional upon confirming that there is no educational requirement (or even perhaps requiring Education to demonstrate that they do have a realistic requirement for that site). By way of background this site was earmarked for housing approximately		Noted, but retain zoning	The Minister for ESC has expressed support for the retention of the d'Hautree School site for educational purposes. The safeguarding of the site for educational purposes does not preclude its release for other uses during the Plan period if it is demonstrated that it is no longer needed for this community purpose. The Minister for H&SS has, through the H&SS 20-year development plan, identified that the site of St Saviour's Hospital may become surplus to requirements and planning permission has already been applied for, and secured, for alternative uses. The site, however, remains safeguarded for healthcare purposes, but its future use for other purposes is	The Minister notes the comments but is not minded to amend the draft Plan

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							17 years ago, in return for the construction of Haute Vallée school. It has been used on an intermittent basis for a variety of temporary uses since then, but remains predominantly a vacant site in the urban area at a time that we are looking for housing sites. Zoning the site as built up area would not preclude it being used for educational purposes, but would ensure that alternative uses can be applied in the event that there is no demonstrable educational requirement without having to rezone this location.			not precluded by either the draft Plan or the existing consent.	
DP805		Mr Jeremy Harris		Policy SCO 1	Education al 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 SC01 . 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
DP811		Mr Jeremy Harris		Policy SCO 1	Education al Facilities	Supporting	Field 327 , St. Martin: The Ministerial Team will recall that the States, in approving the States Annual Business Plan 2010, have agreed that a new primary school should be built at St. Martin on a site adjacent to the existing premises. Field 327 has been identified as a potential site either for the new school building or as a playing field , and it is important therefore that this site should be safeguarded for educational use. This was recognised in the 2002 Island Plan, and is also acknowledged in Policy SC01 of the draft Island Plan 2009-. It is recommended that this proposal should be supported by the Ministerial Team.		Noted	Noted	The Minister notes the support for this policy as it relates to F327, St Martin
DP813		Mr Jeremy Harris		Policy SCO 1	Education al Facilities	Supporting	Former d'Hautree site. Highlands Campus: This site is discussed in some detail in paragraphs 7.18-7.20 of the draft Island Plan, and the content of these paragraphs is supported by the ESC Department. The d'Hautree site is recognised by the Department as being of strategic value in the provision of vocational education , and this is commented upon further in the attached letter to the Property Holdings Department (copy attached as Appendix Five). It will be recalled that the draft States Annual Business Plan 2010 included a proposal from the Property Holdings Department that the d'Hautree site should be scheduled for disposal, but this proposal was put forward without consultation with		Noted	The strategic value of the site for educational purposes is noted	Support is noted by the Minister



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							the ESC Department, and was subsequently withdrawn following representations from the ESC Minister. Discussions will be taking place with the Property Holdings Department about the future use of the site , and in the meantime the ESC Department supports the view that it should be safeguarded for educational use.				
DP171		Mr Stephen de Gruchy		Policy SCO 2	Healthcare Facilities	Supporting			Noted	Noted	Support is noted by the Minister
DP668		Deputy James Reed	Education, Sport and Culture		Community Facilities	Neither	The lead responsibility for the redevelopment of the Sarnares area of St. Clement rests with the Housing Minister, but the ESC Ministerial Team has been involved in discussions with Housing about the future of this area, and it is supportive of the general proposals for improvements. In particular, ESC welcomes the moves to reduce traffic flow in the neighbourhood of Samares Primary School, and it supports the proposals to improve the facilities for pedestrians and cyclists, including the proposed new pedestrian access route through to the F.B. Fields. The creation of new community facilities is also supported by ESC.		Noted	Noted	Noted by the Minister
DP172		Mr Stephen de Gruchy		Policy SCO 3	Community Facilities	Supporting			Noted	Noted	Support is noted by the Minister
DP815		Mr Jeremy Harris		Policy SCO 3	Community Facilities	Neither	Former Odeon Cinema. Bath Street: The ESC Ministerial Team has recently commented on the potential for the former Odeon Cinema building to be redeveloped as a cultural centre for the Island, and these comments were forwarded to the Planning Department in response to a public consultation on the North St. Helier Masterplan. These comments are of equal relevance to the Island Plan, and it is recommended that a copy should be forwarded as part of the ESC response on the Island Plan.	This area of St Helier embraced by the North St Helier plan includes three important sites associated with cultural activity: the Jersey Arts Centre in Phillips Street, the former St James Church in St James Street, and the former Odeon cinema in Bath Street, now unoccupied. Both the former church and cinema are listed buildings. The Arts Centre site and St James are in public ownership: the former Odeon is privately owned. The Jersey Arts Centre occupies its Phillips Street site - converted into an arts centre in the mid-1980s - on a 99-year lease from the States. It also has use of the former St James Church and its adjoining vicarage by informal agreement with Property Holdings; in addition, the Jersey Arts Trust uses rooms within the vicarage as office accommodation. Hitherto, there has been insufficient funding available to convert the former church to a performance space of acceptable standard although it is used by the Arts Centre for informal performances and rehearsals; the vicarage also provides significant office accommodation for Arts Centre staff. A strategic review in 2008-9 by the Jersey Arts Centre Association raised questions about whether the	Noted	Any review of existing cultural facilities and the proposed use of existing sites within the Built-up Area for these purposes would be enabled and could be considered within the context of Policy SCO3.	The Minister notes the comments but is not minded to amend the draft Plan

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								<p>Phillips Street centre was adequate for future cultural activities: the possibility of seeking to relocate to more suitable premises was raised at the Association's AGM in May this year. Although a detailed analysis of the Arts Centre's needs has not been conducted, the strategic review revealed a number of key requirements including: A central location in St Helier; Proximity of car parking; Space to provide a significant enhancement of the relatively modest facilities currently available. It has been suggested that the former Odeon cinema might provide such an alternative location, satisfying the above criteria and affording a use for the building which could be compatible with its listed status. Such a facility would also complement the vision for the area set out in the North St Helier master-plan with its nearby park setting and improved pedestrian access, and would provide a focal point for the primarily residential areas to the north and east. From a cultural perspective, there is a potential synergy between the park and a cultural facility at the Odeon; indeed , it has previously been suggested as a potential location for the ' National Gallery'.</p> <p>An essential component in a relocated Arts Centre would be a significant gallery space and it seems likely that this could be accommodated on such a site. It should be noted that loss of the vicarage at St James would entail re-locating Arts Centre and Arts Trust staff centrally on a temporary basis. Although the Arts Centre's management committee has a remit to explore future relocation, it should be noted that the subject may well raise debate in practice within the organisation so that further discussion is desirable before any proposal is developed. Looking at the North St Helier plan from a broader cultural perspective, there is a significant opportunity to provide public art both in the new park and also to revivify the surrounding residential areas .</p>			
DP960		Deputy Philip Rondel	Parish of St John Working Party	Policy SCO 3	Community Facilities	Neither	<p>The Recreation Centre forms the main recreational facilities for both the Parish and St John's Village and its future use and development needs careful attention. It is considered that further land should be protected for the possible future use as school playgrounds and also for the Recreation Centre. St John is also home of the motor-cross and karting track , providing further recreational opportunities for islanders.</p>		Noted, but no justification to amend the Plan	<p>The St John Recreation Ground and associated facilities are already protected under the auspices of Policy SCO4 (Open Space) and would also fall to be protected under the auspices of SCO3. The potential safeguarding of land for educational purposes (playing fields) is under consideration in respect of F525, St John (rep DP807). The use of land at Sorel for motor-cross and the loop road of La Route du</p>	<p>The Minister notes the comments made but is not minded to amend the draft Plan</p>

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										Nord for karting are activates which rely on the use of the existing landscape and the highway infrastructure and do not warrant protection as site-specific community facilities.	
DP666		Deputy James Reed	Education, Sport and Culture		Planning for Open Space	Neither	The Ministerial Team notes that the current facility for go-karting is of a temporary nature, and it recommends that consideration should be given to finding a permanent location for this leisure pursuit.		Noted	The provision of a permanent location for this activity is something that can be considered within the context of Policy SCO5 and, with regard to the potential for noise disturbance, Policy GD1. The Minister is happy to consider any proposal that is brought forward by ESC based on a justifiable need and potential location for such a facility.	The Minister notes the comment but is not minded to amend the draft Plan.
DP173		Mr Stephen de Gruchy		Proposal 17	Open Space Strategy	Supporting			Noted	Noted	Support is noted by the Minister
DP748		Paul Harding	The Association of Jersey Architects	Proposal 17	Open Space Strategy	Supporting	11.3 The AJA enthusiastically applauds and welcomes the Open Space Strategy and associated Policies. 11.4 Considering the Open Space Strategy it is very surprising there are no new Open Space initiatives proposed in the 2009 Draft Plan, instead relying on existing proposals and initiatives. 11.5 A key aim of the 2009 Draft Plan is to intensify development density within the Built-Up area, bringing with it a need for enhancing Open Space provision within this zone and providing additional community facilities. The lack of proposed facilities to ameliorate effects of increased building density risks social disconnection and discontent.		Qualified support noted	Support is noted. Comments relating to an enhancement of existing open space and the provision of new facilities are addressed in the draft Plan at 4.31-4.36 and Proposal 9: Public Realm Strategy, where this requirement is explicitly recognised and a proposal made to address it.	The Minister notes the qualified support for this proposal but is not minded to amend the draft Plan
DP174		Mr Stephen de Gruchy		Policy SCO 4	Protection of Open Space	Supporting	Support with caveat I think the policy should also state that there will be a presumption against permitting the loss of an open space unless people who presently utilise the open space will have easy access to an alternative within a similar travelling distance.		Qualified support noted	The proposed policy, at SCO4(2) already addresses the need for any alternative replacement provision of open space to address the issue of accessibility	The Minister notes the qualified support for this policy but is not minded to amend the draft Plan as the issue raised is already addressed
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	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	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

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							area of land embraced by this change.	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.			facilities' and to thus ensure that they are subject to Policy SCO4 and defined on the Proposals Map.
DP790		Senator Terry Le Main	States of Jersey Housing Department	Policy SCO 4	Protection of Open Space	Objecting	The protection of existing open spaces is important and it is therefore vital to have this general presumption against the loss. However, I am concerned that this policy might impact on proposals embodied in our approved master plan for the regeneration of Le Squez. You will recall from application P/2009/0780 that we proposed and Planning have agreed in principle, to the creation of a village environment as part of the regeneration and this included the closure of School Road, the creation of a School Square for Samares School and linking the school directly with the facilities at FB Fields. This allowed us to propose new parking arrangements for the school on land presently used for residential purposes. The quid pro quo of this will be the switch of part of the existing School Playground (presently used for parking) into residential use for development. I enclose an extract of Drawing 405/07/ESC11 submitted to your Department as part of the planning process. I would be looking for some comfort that this policy and the Island Plan in general would not prevent that aspect of the master plan from being realised.		The Housing Minister's comments are noted.	Policy SCO4 allows for an overall assessment to be made on the potential loss of open space, the adequacy of the open space remaining, and the community benefit that might be derived from proposals aimed at wider regeneration. On this basis, the reOrdering of open space at Le Squez, as part of a wider regeneration project, is not precluded by this policy, but would fall to be assessed under it, assuming that the Plan and policy is adopted before the current scheme is determined.	The Minister notes the comments but considers that the matter is addressed and is not minded to amend the draft Plan
DP401	Mrs Stephanie Steedman	Mrs Stephanie Steedman		Map 7.2	Proposed New Urban spaces	Objecting	If all the money that had been spent on assessing the potential for Fort Regent to enhance the lives of Jersey residents had actually been spent on implementing a plan - then Fort Regent and its environment could provide a wonderful amenity facility for St Helier and Island residents. It is disappointing to see only the linear route adjacent to the Fort designated as open space - there are extensive grounds gardens, vistas and space on the top of Fort Regent. What a wonderful, under utilised resource. If the States wants to spend money on improving the lives of St Helier residents, then bite the bullet and make Fort Regent more accessible. Invest in it as the lesiure/entertainment quarter for the town. This would be a significant enhancement for the existing 30 000 people and the people who will occupy the 2 500 new homes planned in St Helier.	The Draft Plan advocates increasing residential densities in the town - successful urban places have successful urban places where people can go and socialise and participate in life. Make the most of the space we have.	Noted, but reject as already addressed	The existing open space at Fort Regent is protected under Policy SCO4 and the potential value of this asset, and its potential contribution to the quality of life in St Helier, will be addressed as part of Proposal 11: St Helier Regeneration Zones, where Mont de la Ville (including Fort Regent) is specifically identified (at Proposal 11(2)).	The Minister notes the comments but is not minded to amend the draft Plan as the matter is already addressed

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DP1118		Mrs J Jones		Policy SCO 5	Provision and Enhancement of Open Space	Supporting	Town Park This project I would dearly like to see happening in order to connect the imbalance of outdoor and recreational space for those that live and commute to this area. See Policy BE13 Important Open Space Hopkins Plan page 6. Car parking appears to be found elsewhere which will allay the fears of those who think they may be done out of their usual parking spot at Gas Place. No building on the site please.		Noted	Support for SCO5(1) Town Park site is noted	The Minister notes the support for the provision of the Town Park
DP1182		Kevin Pilley		Policy SCO 5	Provision and Enhancement of Open Space	Objecting	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 accord with guidance to be developed and adopted by the Minister in accord 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
DP175		Mr Stephen de Gruchy		Policy SCO 5	Provision and Enhancement of Open Space	Supporting	Support with caveat I am of the view that the policy should prohibit the extension of, or provision of new, golf courses. Jersey has enough of such 'manicured' open space already.		Reject	Proposals for new golf courses, outside of the Built-up Area, would need to be considered in the context of Policies NE6 and NE7, relating to the Coastal National Park and the Green Zone, where their impact on the character of the countryside would be a key test, and also in the context of Policy EVE3.	The Minister is not minded to amend the draft Plan as the proposed policy regime is considered to be sufficient to deal with matter
DP176		Mr Stephen de Gruchy		Policy SCO 6	Allotments	Supporting	Support with caveat I think the policy should stipulate that a planning condition will be imposed requiring (high quality) sheds and greenhouses on the site to be of a uniform size, colour and materials. This is to avoid the unsightly 'shanty-town' look of many allotments.		Qualified support noted	Policy SCO6 states that permission will only be granted where proper management of the allotment site can be assured. This is elaborated on in para 7.57 of the supporting justification which states that management of the visual impact of allotments will be regulated through planning condition or code of practice.	The Minister notes the qualified support for this policy but considers the issue raised to have been already addressed so is not minded to amend the draft Plan
DP433		John Le Maistre	Jersey Farmers Union	Policy SCO 6	Allotments	Supporting	The Jersey Farmers' Union recognises the demand for allotments. We believe that their provision can be achieved through the use of smaller fields that		Noted	Policy SCO6 states that one of the criteria for the assessment of proposals for allotments is that	Support is noted by the Minister



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							are near residential areas. We also believe that fields that are or could be used by the Industry should not be re-zoned for allotments. It will be necessary to ensure that only permitted pesticides, (non commercial) are used on these sites and care must be taken to ensure that allotment holders follow the correct protocols to avoid chemicals entering water courses etc. We would request that the Industry is consulted prior to any fields being taken out of agriculture for this purpose.			they are within or close to the Built-up Area. It is not proposed to rezone land for allotments. The management of pesticides on an allotment is not a planning matter but will need to accord with other legislation and regulation. Planning applications for a change of use of land for the purposes of allotments will be advertised in the normal way. The Environmental Management and Rural Economy Section of the Environment Department will be consulted as a matter of course and assess any proposals for the use of agricultural land. Their comments will be material to a consideration of the proposals under ERE1: Safeguarding of agricultural land	
DP551		Mr Paul Harding	The Association of Jersey Architects	Policy SCO 6	Allotments	Supporting	We query why allotments are not viewed as agricultural land ( surely they are both used for growing food ?) and therefore suggest presumption against realising them on land deemed to be "required for agriculture" is rather misplaced.	The AJA enthusiastically applauds and welcomes the policy to realise allotments.	Qualified support noted	It is important to protect agricultural land, and the rural economy, for primary agricultural production. The use of agricultural land is regulated to ensure that both bona fide agriculturalists and smallholders can occupy agricultural land under the Agricultural Land (Control of Sales and Leases) (Jersey) Law 1974. Consequently, it is important to ensure that land required for primary agricultural production is appropriately protected, which is why it is necessary that proposals for allotments on agricultural land are appropriately assessed, and not just treated as being part of agriculture.	The Minister notes the qualified support for this policy but is not minded to amend the plan
DP926		Mr Daniel Wimberley		Policy SCO 6	Allotments	Objecting	REC change to remove condition re agricultural land - absurd!! P.295		Reject	It is important to protect agricultural land, and the rural economy, for primary agricultural production. The use of agricultural land is regulated to ensure that both bona fide agriculturalists and smallholders can occupy agricultural land under the Agricultural Land (Control of Sales and Leases) (Jersey) Law 1974. Consequently, it is important to ensure that land	The Minister is not minded to amend the draft Plan

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										required for primary agricultural production is appropriately protected, which is why it is necessary that proposals for allotments on agricultural land are appropriately assessed, and not just treated as being part of agriculture.	
DP944		Mr James Godfrey	Royal Jersey Agricultural & Horticultural Society	Policy SCO 6	Allotments	Neither	Community gardens and allotments: There is an increasing interest in this, although any increase in supply must be managed through a central scheme to prevent uncoordinated and inappropriate development.		Noted	The appropriateness of proposed allotment development will be considered against the context of the proposed policy. Any central scheme of management, to co-ordinate overall supply, is not a planning matter, although the impact of provision upon agricultural land will be part of the assessment of proposals, under the terms of SCO6(2).	The Minister is not minded to amend the draft Plan as the issue is satisfactorily dealt with by the proposed policy
DP962		Deputy Philip Rondel	Parish of St John Working Party	Policy SCO 6	Allotments	Neither	There is a demand for allotments within the Parish. Confirmation of this demand needs to be made, as a suitable location has been identified . An appropriate management mechanism is being drafted in order for parishioners' to receive the most benefit.		Noted	Proposals for allotments can be considered within the framework of the proposed policy SCO6.	Noted by the Minister
Travel & Transport											
DP1058		Ray Shead	The Jersey Chamber of Commerce	8	Travel and Transport	Objecting	A strategic debate on assessing the need, desirability, impact and function of Transport car use in Jersey has not been concluded. The arguments against car usage have been over simplified. The south of town is regarded as the location for growth in retailing floor space in the draft IP and in recent years this area has enjoyed the lion's share of investment in transport infrastructure. The north of town is being groomed for more housing, as indicated in the North Town Master Plan's (NTMP) Terms of Reference, which deliberately ignores retailing to the detriment of many small independents that have a valuable role. The socio-economic impact of proposed closure of roads must be properly described. It is difficult to understand the adequacy of evidence feeding into the Sustainable Transport Policy review (STP) because it appears that a strategic decision to ignore reasonable access to the wider general public has already been taken, based on narrow environmental and welfare arguments. This should be independently reviewed. Chamber has repeatedly alerted the strategic risk of a "tumble weed" St Helier, which remains unacknowledged by the States' strategic planning. The majority of trips		Reject	The States Strategic Plan seeks to shift attitudes towards the ownership and use of the private car and, on this basis, the strategic objectives of seeking to reduce private car use and to develop a more sustainable pattern of transport in Jersey is considered to be clear; The North of Town Masterplan seeks to address matters of car parking infrastructure as an integral element of the masterplan. The completion of the St Helier Ring Road in this area in recent year's represents significant investment in transport infrastructure in this part of the town; Road closures: there are no proposed road closures in the draft Plan. Proposal 18 sets out proposals for pedestrian priority in parts of the town. The maintenance and enhancement of the viability and vitality of the town centre is an	The Minister is not minded to amend the draft Plan

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							made to town by those using shopper parking facilities say that it is difficult to find a space (JASS 2008 figure 5.4). Given that the south of town is regarded as well served for transport access, this reflects badly upon and disadvantages shopping in the north of town. 8.1 - 8.14 - The STP and IP should make proposals that are appropriate and realistic for an Island-wide holistic transport strategy. Reducing car usage can only occur when practical alternatives have been provided. The harbour's location and existing road structure make urban St Helier/St Saviour the primary location for logistically efficient food and non-food retailing.			objective which underpins these proposals as demonstrated by the success of other pedestrian priority schemes already implemented in St Helier (e.g. Charing Cross and Broad Street); Ease of public parking: the draft Plan seeks to ensure that the level of off-street public parking provision in the town is maintained. Whilst JASS suggests that some people may find it difficult to park, it does not determine in which part of town they had difficulties or whether they were unable to park and it clearly indicates that the difficulty of finding a parking space is higher for those on-street 20 minutes. In this context, it is relevant to note that shopper car park capacity is generally available at Sand Street MSCP.	
DP620		Ms Sarah Le Claire		8	Travel and Transport	Neither	1. Introduction This review focuses on the sections relating to the reduction of the Island's dependence on the car (Section 2.6) and Transport (Section 8). The White Paper makes a number of strong macro statements: 'Changes in climate are likely to have far-reaching, and potentially adverse, effects on our environment, economy and society for which we need to prepare and adjust. There is, therefore, an urgent need for action on climate change.' (Section 2.9, p35) 'The main focus of this policy is to create the conditions necessary to minimise the worst aspects of car travel, to provide alternatives to the private car and to improve air quality.' (Section 2.61, p48) 'In this respect, it can seek to promote and apply policies which have a direct impact on reducing travel demand, enabling and encouraging travel by more sustainable modes and assisting the objectives of traffic management by influencing matters such as levels of car parking availability and infrastructure to support other travel modes and fuels (eg the provision of cycle paths, cycle parking and electric charging facilities).' (Section 8.2, p298) Whilst the statements above are commendable there is a woeful lack of detail on the use of electric vehicles (EVs) on the Island and indeed the only reference in the entire paper to any form of EV is in a reference to electric charging facilities in section 8.2. 2. SECTION 2.6: REDUCING DEPENDENCE ON THE CAR The thrust of this section is to ensure that new developments comply with a "Travel Plan" that		Reject	Electric car use: this is a land use planning policy document and as such, can only seek to affect those aspects of promoting electric car use that relate to the use of land and buildings, hence the reference to such at 8.2; Efficiency of Island bus service: this is a land use planning policy document and is not related to the management or specification of the contract to run the Island's bus service, which is managed by the Transport and Technical Services Department	The Minister is not minded to amend the draft Plan

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							<p>deals with issues such as accessibility, parking and traffic control etc. It seems a pity that a section entitled 'Reducing the Dependence on the Car' does not go further and explore what alternatives there are to vehicles that are reliant on fossil fuels. AGES would like to see, under this heading, a section focussing on the alternatives to the combustion engine, for example: EV's, Hydrogen fuel cell cars and compressed air cars.</p> <p>3. SECTION 8: TRAVEL AND TRANSPORTATION The objectives and indicators for travel and transportation are as follows: Objective TT 1: Travel and Transport Objectives to reduce the need to travel through the integration of planning and travel and transport strategies which serve to minimise travel and traffic generation; to influence travel demand and choices of travel mode by achieving development forms and patterns which enable and encourage a range of alternatives and which positively enables and promotes walking, cycling and public transport as a more sustainable mode of travel than the private car; to make efficient use of existing transport infrastructure and minimise new road construction; to reduce pollution, noise and the physical impact and risk to health posed by traffic and transport Indicators TT 1: Travel and Transport Indicators level of peak hour traffic flow by mode level of road injuries level of road transport pollution number of travel plans implemented AGES proposes that the following objective is added: 'to facilitate the use of EVs on the island with the aim of achieving a target of 10% of all new vehicles registered by 2014 will be an Electric Vehicle' Following on from this a key indicator would be: 'number of electric vehicles registered in 2014'. The Island Plan White Paper looks at each of the objectives in detail. The detail required for the new objective proposed above could be taken from Section 4 of the Report to Chief Minister of 1 st December 2009 entitled 'Transportation Jersey - Replacing the Combustion Engine' (as discussed on 9 th December 2009), which highlighted some of the incentives and or penalties that may be used to encourage the use of EVs in Jersey. The Island Plan White Paper then goes on to discuss how, when making transport related decisions, priority must be given to the most sustainable modes of travel (section 8.22). AGES would have hoped to have seen EVs mentioned as a higher priority than car borne shoppers and visitors (priority 7) and car borne commuters (priority 8). Finally, section 8.65 looks at Public Transport and again the emphasis seems to be on public transport in the context of planning and development and not</p>				

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							on ensuring that the bus service is run in the most efficient manner, the ultimate manifestation being an electric bus service. It would not be difficult to include a paragraph that set out the guidelines for all future tenders for the supply of bus services, which would include a set of criteria on the carbon efficiency of the buses as well as an option to provide an electric bus service. 4. CONCLUSION It is appreciated that the Island Plan White Paper is a macro level plan and certainly identifies many of the environmental problems facing the Island in the short to medium term. However, AGES is surprised that there is no mention of the EV as part of the solution to the climate change challenge, especially as the States are in a position to take the lead in encouraging the use of EVs (both private vehicles and public transport) for very little or even no capital outlay. It is hoped that, at the very least, the suggestions mentioned above are considered and included within the final Island Plan. It is also appreciated that it may be more appropriate for some of these observations and recommendations to be included within the Sustainable Transport Plan rather than the Island Plan. As such, this paper will also be forwarded to Transport and Technical Services for their consideration.				
DP635		Richard Plaster	Jersey Electricity plc	8	Travel and Transport	Supporting		We support strongly some of the objectives in Section 8 - Travel and Transportation, as we believe that electric vehicles and electric buses have the potential to meet many of these objectives. We would recommend that these opportunities be explicitly mentioned in the Plan with an indication of the States' commitment to these.	Noted	Electric car and bus use: this is a land use planning policy document and as such, can only seek to affect those aspects of promoting electric car use that relate to the use of land and buildings, hence the reference to such at 8.2;	The Minister notes the support for the use of electric vehicles
DP660		Conneta ble Peter Hanning	Parish of St Saviour	8	Travel and Transport	Objecting	I write to submit the Parish viewpoint on certain aspects of the Draft Island Plan which I consider are very relevant in respect of St. Saviour. In so doing I make no apologies for expressing criticism at the lack of judgement and foresight on certain aspects that emanated as a consequence of both the 1987 and 2002 Island Plans. Traffic One must question the logic of permitting nearly 2/3 (19) of all island primary and secondary schools to be established within a radius of 3 miles in and around this Parish. The consequential effect of school orientated traffic brings about virtual gridlock on the main arterial roadways to town. That, and the lack of on-site parking at certain schools has led to serious issues of indiscriminate parking and public disquiet, particularly from neighbouring residential areas. A prime example being Wellington Road which situation can best be described as chaotic. It is also very noticeable that 'white van man' syndrome is		Noted	School traffic management: the generation of and management of traffic associated with the Island's schools is not a land use planning issue. Notwithstanding, the draft Plan seeks to encourage and facilitate the use of other modes of transport other than the private car to reduce congestion on the Island's roads, particularly during peak hour travel; Commercial parking: the draft Plan makes it clear that the Minister will review parking guidelines (Proposal 19). It is also relevant to note that there may be proposals emerging from the Sustainable Transport Policy, being developed by the T&TS	The Minister is not minded to amend the draft Plan



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							manifesting itself in the lower reaches of the Parish, where the urban sprawl and commercial activity is seemingly forever creeping. It is therefore becoming increasingly important to regulate more stringently the requirement for business houses to demonstrate that their commercial vehicles are properly catered for on-site, without reliance on kerbside parking or within residential estates. Likewise provision for accommodating visitor/customer traffic should be a pre-requisite.			Dept, which seek to regulate commercial vehicle use part of which may consider the level and type of parking provision for such vehicles.	
DP750		Paul Harding	The Association of Jersey Architects	8	Travel and Transport	Objecting	12.1 There are inherent contradictions between Built-Up Area section in the 2009 Draft Plan compared to the Travel & Transport section. For example a significant section of the Built-Up area is located with the western 'housing conurbation' of St Brelade and St Peter and the Plan militates against employment uses in this area forcing these residents to primarily work in St Helier, but the overarching Travel and Transport objective is reducing need to travel. In which case the Plan should surely promote some employment related uses (offices, retail, etc.) within the western part of the Built-Up area, rather than concentrating them in St Helier ? 12.2 The AJA does not believe that issue of public transport provision should be conflated with the best and most appropriate solutions for locating our built development requirements.		Reject	Reduce the need to travel: the assertion is made that the draft Plan fails to reduce the need to travel by seeking to constrain development out with St Helier thus necessitating the need for people to travel to town to work. It is accepted that the Spatial Strategy seeks to focus on the town of St Helier and, from a transport perspective, this is considered to be appropriate, because of the concentration of people in and around the town, and the fact that the transport infrastructure is centred on St Helier. It is relevant to note, however, that the draft Plan does permit employment activity outside of the town of St Helier, in other parts of the Built-up Area, as facilitated by policies EO3: small scale offices; ER3 Local Shopping Centres (in which Les Quennevais/Red Houses and St Peter's Village are defined); EVE2 Tourist Development Areas (including St Aubin and St Brelade's Bay); and Proposal 12: Jersey Airport Regeneration Zone, which specifically refers to the potential for new commercial activity here. It is thus not accepted that the draft Plan precludes employment activity in the western Built-up Areas. Public transport provision: The objective of Policy TT8 is not to constrain new development (where it accords with the Spatial Strategy of the Plan), where it is not within 400m of the existing public transport route network, but	The Minister is not minded to amend the draft Plan

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										rather to ensure that the public transport route network is developed and enhanced to ensure that those locations most appropriate for development receive a better level of public transport provision than that which they might currently receive.	
DP970		Mr. Maurice DUBRAS		8	Travel and Transport	Neither	<p>For background, I am working with the Draft 2010 consultation document and the computer map. Also, I have in hand the 2001 Consultation document which was the basis for the 2002 Island Plan which is in effect, together with the maps that accompanied it. I note that the Transport &amp; Technical Minister issued a draft Sustainable Transport Policy whose consultation period ended at the end of November. I believe it is remiss of that Minister not to make a cross-reference in his document to the Draft Island Plan Review and accept, in effect, that it needs to link in with it and your process. Fortunately, on page 298 of the later document, the Environment and Planning Minister makes reference to the planned Transport consultation which by now has no doubt been completed. I make this point for, as Deputy for St. Lawrence between 1996 and 2005, I made it my duty to the parishioners to work hard to try to relate the two departments [or their predecessors] and Committees [now Ministers] and their work to one another insofar as it influenced community life within the Parish and for those travelling through it. As a case in point, the large housing development at Bel Royal which was very problematic for many of the residents in the surrounding neighbourhood, was one where I made every effort to ensure that the likely impact of that development on travel and transport and the roads, pedestrian and cycle pathways together with the bus network were properly integrated. I am not convinced to this day that that aspect of the recent Transport policy and action plans yet has been properly integrated with this Draft Island Plan and I look to the next stage of this Review and consultation process to prove to me, and convince me, otherwise. Therefore, I urge the Minister to require due process to take place and every effort be made in consideration of each of the proposals under proposed new Policy H1 and H2, as successors of the 2002 H1 and H2 policies, to ensure that the Sustainable Transport policy is taken fully into account. Conclusion At this point, I return to my earlier comments about connecting transport policy for roads and related services, as</p>		Noted	<p>The draft Island Plan has sought to respond to, support and complement the emergent Sustainable transport Policy, as stated at 8.3. The transport implications of new housing sites have been considered as an integral element of site assessments.</p>	<p>The Minister notes the comments made and will seek to work with the Minister for Transport and Technical Services to ensure consistency of objective and application of policy, where it relates to travel and transport</p>

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							well as those for economic development, with those for planning to the continuing need for a holistic approach to be taken. For those of us living at the nexus of roads from the west and north the pressures and disturbance of traffic is very high. For those of us of all ages who are pedestrians, the risk to our safety is considerable. When any one of the roads is closed for any reason or special events take place to the west and north of us, we generally suffer severe inconvenience. In spite of warnings for the last ten to fifteen years or more, nothing appears to have been done to redesign or improve the road network to the west to minimize the congestion. While many of us utilize the bus system, the increasing population by way of new developments out of St. Helier has not been correspondingly accommodated by alternate modes of transport. I urge you and the other Ministers to pay special attention to these dilemmas in the immediate future, for the long term benefit of existing residents. My request for a special study, on both macro and micro levels, made in 2004 and 2005 is thus maintained and reiterated. Other changes in existing policies or the introduction of new policies elsewhere in the Draft Island Plan that have a potential effect on us and our neighbours need to be carefully thought through, especially seeking out unintended consequences. No part of the community is an island within this Bailiwick; every part, however, is special in its own right. That is why this revised Draft Plan is important and why this consultative process and Review by external inspectors is welcomed.				
DP983		Conneta ble K Vibert	Comite des Conneta bles	8	Travel and Transport	Neither	Agricultural accesses The Director of Planning advised that the creation or widening of accesses to public roads which are predominantly for agricultural purposes does not require planning permission as they are permitted by Schedule I, Part 2, Class F of the Planning and Building (General Development) (Jersey) Order 2008. However, we note that such permitted development is subject to condition F.3 namely: "The approval of the relevant highway authority must have been obtained before the means of access is made or widened. ". Is it not therefore possible for the 'relevant highway authority' to impose conditions to prevent the loss of gateposts and damage to such features as roadside walls when granting approval? I am sure all Parish Roads Committees would be prepared to impose such a condition and would hope the Minister for Transport and Technical Services would agree to do likewise for main roads. This would 'protect and enhance our natural and built		Noted	The issue raised is not one for the draft Plan but for planning legislation. In this respect, it is relevant to note that work to amend the Planning and Building (General Development)(Jersey) Order, to address the concerns raised, is ongoing.	The Minister notes the comments made but is not minded to amend the draft Plan

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							environment' which is Priority 13 in the States Strategic Plan 2009-2014. Of course, any amendment you may wish to make to the Order to strengthen this requirement would be most welcome but can it not be applied immediately?				
DP986		Conneta ble K Vibert	Comite des Conneta bles	8	Travel and Transport	Neither	Planning gains The principle of 'planning gain' has recently been introduced by your Department; we understand that this relates to highway improvements which might be made when larger developments take place but is a matter for negotiation with the developers as it cannot be made a condition of granting the application. The key theme to all these seems to be the inability to impose or enforce conditions as part of the granting of a planning consent. We recommend that if, as your correspondence suggests, you cannot endorse conditions imposed by a highway authority this must be addressed as part of the Island Plan review.		Reject	The upholding or enforcement of planning conditions is not material to the Island Plan Review. The use of Planning Obligation Agreements, which are mutually binding legal contracts at Policy GD4: Planning Obligation Agreements	The Minister is not minded to amend the draft Plan as the issues raised are not material to it or are already addressed
DP586		Deputy John Le Fondre			TT: Introduction	Supporting	Ref para 8:14 Parking Provision - limited support to reduce the amount of car parking associated with new residential development. - AGREED ! See comment before. However this does need to be taken on board as part of the planning process. Developments (even in town) should not be permitted minimal parking provision.		Note qualified support, but reject qualification	The ability to park is fundamental to the use of the private car thus the planning process can influence the availability of parking at the start and end of each journey. As a consequence, Proposal 19 of the Plan proposes the adoption of new maximum parking guidelines, as opposed to minimum parking guidelines.	The Minister notes the qualified support, but is not minded to amend the draft Plan
DP9		Mr Mark Le Sueur			TT: Objectives and Indicators	Objecting	Assumption : The States assume that there will be a continuing need for road traffic transport. Observation : The plan appears to dodge or evade the core principles of process management (traffic management), the elimination of constraints within the current traffic flow. This is not a onetime fix but an evolving strategy of continuous quality improvement for the moderation (easing) of traffic flows. Clearly there is a need to identify the current constraints and plan for their moderation of the constraints . Plan as written has no clear objective of plan to achieve that objective; a non plan . The performance indicators as written are meaningless other than for the continued measurement of past failures. This section of the plan requires a radical overhaul by somebody who understands of process management (traffic management).		Reject	The travel and transport objectives of the draft Island Plan are considered to be clear and consistent with those of the emerging Sustainable Transport Policy, sponsored by the Island's strategic highway authority, the Transport and Technical Services Department. Furthermore, there is a need to recognise, as stated in the document, that the Island Plan is but one element of a comprehensive policy regime relating to travel and transport, and specifically the land use elements of it, and thus its aims, objectives and outcomes can only ever influence part of the wider issue.	The Minister is not minded to amend the draft plan
DP177		Mr Stephen de Gruchy		Objective TT 1	Travel and Transport Objectives	Supporting			Noted	Noted	Support is noted by the Minister
DP417		Mr Marc Burton	Institute of	Objective TT 1	Travel and Transport	Supporting	The IoD supports the reduction in car traffic into town but would like to see a joined up and cohesive		Noted	The Draft Island Plan is a land use planning policy document which,	The Minister notes the

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			Director s		Objectives		policy on how this can be achieved whilst ensuring businesses do not suffer e.g. with lack of parking provision for staff and employees or alternative means of transport. Issues are under consideration via the North Town Masterplan in terms of parking at Gas Place, Anne Court, Green Steet and Minden Place, but again this must be within the guidelines of the Island Plan, the general vision for St. Helier, and have a co-ordinated approach;			as stated at section 8.2 and 8.3 of the Travel and Transport chapter (p.298), seeks to ensure consistency and complementarity with other policy regimes affecting travel and transport in the Island. In particular, it is important that the Island Plan is consistent with the emerging Sustainable Transport Policy from the T&TS Department, which is the Island's strategic highway authority.	qualified support for these objectives and will seek to ensure that the Island Plan is consistent with and complementary to other policy objectives related to travel and transport
DP1059		Ray Shead	The Jersey Chamber of Commerce	Indicator s TT 1	Travel and Transport Indicators	Objecting	8.15 - 8.23 & Indicators TT 1 - Shoppers' access and travel needs are not appraised. A policy to favour "only bulk shopping in out of centre locations" (8.20) is unclear whether this is designed to relocate shopping activity in the Markets away from St Helier to new food shopping locations yet to be identified. Clarification is requested.		Reject	Access and travel needs, where they relate to food retailing, are considered within the policies ER1 - ER11 where there is a clear strategic approach set out which seeks to ensure that the vitality and viability of existing retail centres is maintained and enhanced, particularly that of the centre of St Helier.	The Minister is not minded to amend the draft Plan
DP1173		Mrs. Celia Scott Warren			TT: Policies and Proposals	Supporting	I welcome the Travel and Transport initiatives. However, I believe there must be adequate car parking provision in St. Helier - otherwise St. Helier town centre and the shops will suffer.	Whilst I support park and ride schemes, car-sharing initiatives and increased bus usage, there needs to be adequate car-parking provision in St. Helier, for the reasons given above.	Noted	The proposed policy regime in relation to car parking is considered to be sufficiently robust to ensure the provision of adequate car parking provision for shoppers in order to maintain the vitality and viability of the town	The Minister notes the qualified support for this part of the draft Plan
DP1119		Mr Ben Ludlam	C Le Masurier Ltd		Targets	Objecting		The Transport proposals and Draft Integrated Travel and Transport Plan are totally unrealistic and unworkable, particularly the proposed 50 % increase in bus and cycle use. The whole transport issue, including the use of the car and the cost of car parking, which is extremely low, in States of Jersey public car parks needs to be reconsidered. The Island Plan cannot be provided in its current form without this review. The comments above can be used in the consultation but should not be printed, in any form, with our prior written consent.	Reject	The issues raised essentially relate to the emerging Sustainable Transport Policy, sponsored by the Transport and Technical Services Department, and not the draft Island Plan. The Island Plan is a land use planning policy which will seek to support other strategic policy objectives related to travel and transport as established by the strategic highway authority.	The Minister is not minded to amend the draft Plan
DP665		Deputy James Reed	Education, Sport and Culture		Walking and Cycling	Supporting		The Ministerial Team supports the work of the Transport and Technical Services Department in developing the Island's cycle network, and believes this should have a positive impact on the Island 's transport system , particularly at peak times. The ESC Department works with Transport and Technical Services on a variety of relevant initiatives, including the Safer Routes to School project, and we encourage students to consider transport alternatives in travelling to and from	Noted	Noted	Support is noted by the Minister



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								school. It is recommended, therefore, that due prominence should be given in the Island Plan to the promotion of alternative transport solutions, as this would be line with policies already being promoted by the Transport & Technical Services and Education, Sport & Culture Departments.			
DP874		Mr Stephen D Smith	Health Protection Services		Walking and Cycling	Neither	In all new developments there needs to be provision of pedestrian, cycle ways and access to bus stop(s). The provision of such could assist in island wide transport networks i.e. eastern railway walk etc.		Noted	This is already explicitly addressed as part of Policy TT8: Access to public transport	The Minister is not minded to amend the draft Plan as the issue is already addressed
DP882		Mr Andrew Heaven	Health Improvement (Public Health Department)		Walking and Cycling	Neither	In order to ensure health improvement is actively included within the planning process, supplementary planning guidance for health improvement should be developed with the Public Health Department to support the following areas: Ensure travel planning promotes cycling and walking as part of any future development that could lead to increased travel demand or would have a significant impact on travel or public transport systems Ensure new developments to both natural and built environments have explicit obligations to secure safe pedestrian access to pavements, cycle routes or public transport. e.g. Public Realm of St Helier		Noted	Travel Planning is addressed by Policy TT9. It is acknowledged that there is likely to be a requirement for guidance about the development and monitoring of travel plans which can be done in consultation with key stakeholders, including T&TS and the Public Health Dept; The requirement for new development to be well related to existing transport infrastructure (including public transport and cycle routes and footpaths), as well as contributing towards the enhancement of the transport infrastructure, is set out in Policies TT2; TT3 and TT8	The Minister is not minded to amend the draft Plan as the issues raised are already addressed
DP19		Mr Terence Tanner			Footpath and Cycle Network	Neither	If cycle path provided cyclists should not use public road	the reason for spending money providing bike riders with these paths is to ensure their safety but a minority still use main roads which cause backlogs of traffic and drivers become impatient and make reckless decisions.	Reject	This is not a land use planning matter, however, cyclists are legitimate road users of the public road network and if the Island is to secure a more sustainable pattern of transport in the Island, there is need to encourage more cycling on all elements of the public road network, including existing and new cycle tracks as well as the existing road network. It is an unrealistic assumption to suggest that more cycling should be encouraged whilst seeking to limit cyclists to the use of cycle tracks where they are provided adjacent to roads. One of the specific objectives of cycle tracks is to provide facilities to encourage more cycling by more vulnerable sectors of the	The Minister is not minded to amend the draft Plan.

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										population, such as children and adults who perhaps are lacking in confidence to use the road: they are not provided as an alternative to the road for all cyclists. Furthermore, cycle tracks are only generally designed for lower speeds of travel and some cyclists may wish to travel faster for which it is more appropriate, and safer, to use the public roads. What is required is an increased awareness and tolerance of the rights and responsibilities of all road users, all of whom have a legitimate right to use the road network in whatever mode of transport they choose.	
DP178		Mr Stephen de Gruchy		Policy TT 1	Protection of the Island's Footpath and Cycle Network	Supporting			Noted	Noted	Support is noted by the Minister
DP984		Conneta ble K Vibert	Comite des Conneta bles	Policy TT 1	Protection of the Island's Footpath and Cycle Network	Supporting	Accesses across pavements Several Parish Roads Committees, when considering requests to widen or create new vehicular accesses across pavements, currently ask the applicant to lower kerbstones and realign the pavement. The advice from the Assistant Director - Development Control is that the Planning Department cannot impose conditions and other restrictions relating to land which is not in the applicant's ownership. We understand that the Planning Department may not be able to impose such conditions but would suggest that, if a highway authority has to grant permission prior to an entrance being widened then that highway authority can determine the terms and conditions which might be imposed on such a permit. We would therefore suggest that where the pavement is owned by another (usually the States or Parish) that owner should be able to require the applicant to make such changes as a condition of granting the access. This would also 'protect and enhance our natural and built environment'.		Qualified support noted	The support of the Comite des Connetables for this policy is noted. Where development affects, or places a burden on community infrastructure, however, consideration should be given to the use of planning obligations, as set out in Policy GD4, to ensure that community infrastructure can be properly planned and/or to ensure that the true cost of development is met by the developer.	The Minister notes the qualified support for this policy
DP587		Deputy John Le Fondre			Footpath Provision and Enhancement	Supporting	Ref para 8:37 Protection of banques, walls etc - I completely agree with this statement. However there have been occasions when such features have either been completely removed, or when reinstated have been brash new constructions which have not been sympathetic with what has been replaced. By way of example, it is my understanding that a banque can consist of a		Noted	The need to ensure that the implementation of this policy recognises and protects the character of the countryside is acknowledged. It is considered that the policy is sufficiently robust to deal with this issue as specific reference is made to	The Minister notes the qualified support for policy TT2

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							(granite) wall (often being a mix of granite and other stone, rather than a perfectly dressed brand new granite wall), with an earth bank on top of it. [As well a being a normal bank]. Which then gets covered in grass, trees and other vegetation. There have been occasions when this has just been replaced with a standard granite wall, with a couple of tress planted behind it. That is just urbanisation, and does not signify the careful design led criteria that one is usually promised at the start of the process. There therefore needs to be attention to this type of detail in order to ensure that the character of the area is not just completely destroyed by the development process.			Proposals 4; Policy NE4; Policy HE3; Policy HE4 and Policy HE1, which seeks to protect natural features as well as features of architectural and historic interest.	
DP179		Mr Stephen de Gruchy		Policy TT 2	Footpath Provision and Enhancement	Supporting			Noted	Noted	Support is noted by the Minister
DP752		Paul Harding	The Association of Jersey Architects	Policy TT 2	Footpath Provision and Enhancement	Supporting	12.5 While the AJA generally supports this Policy we believe it should recognise there are good alternatives to siting new footpath infrastructure next to roads. There are instances where there are more amenable solutions to siting footpaths immediately adjacent to roads - e.g. new Airport footpaths.		Note qualified support	The policy does not specifically require the provision of new footpaths immediately adjacent to the road and thus enables the consideration of alternative routes. The need for direct, convenient and safe pedestrian access needs, however, to be recognised.	The Minister notes the qualified support for this policy and considers that the policy, as drafted, addresses the qualification made. The Minister is thus, not minded to amend the draft Plan.
DP1060		Ray Shead	The Jersey Chamber of Commerce		Pedestrian Priority	Neither	38 - Pedestrianisation and other investment bring benefits to the public realm. However there are also disadvantages which the IP fails to discuss objectively. Supporting the town centre's "vitality" and "viability" by further pedestrianisation are economic assumptions, presumably made as an aesthetic appraisal, without reasonable regard for any possible negative impact. The community should be presented with a balanced discussion on whether the IP is adopted in this form, as is best practise and a legal requirement in the UK (PPS4). 8.41 - Closing these streets will be viewed by some as a significant increment in effectively pedestrianising St Helier. This is not a certain economic gain; there are benefits and costs. Services will be lost and traffic nuisance will be condensed elsewhere. If valued services are to be maintained, the IP and STP must improve St Helier's accessibility or reassign retailing elsewhere on and off the Island. EDAW is being cherry picked of anti-car policies, when other proposals made by EDAW		Reject	Pedestrianisation: the draft Plan contains no proposals for pedestrianisation. Proposal 18 puts forward proposals for the potential introduction of pedestrian priority, following further development, analysis and consultation. One of the objectives of the development and implementation of these schemes is to safeguard and promote the commercial viability of these areas, as has been achieved by the implementation of existing schemes such as those undertaken at Broad Street, Charing Cross/York Street and Conway Street; Consultation; the Island Plan will not be adopted until there have been opportunities for the policies and	The Minister is not minded to amend the draft Plan

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							to facilitate economic activity are ignored. 8.42 - Modelling must be seen to be done objectively and transparently. The terms of reference and methodology for such work should be published before it commences, if it is to be creditable. 8.43 - Traditional trading in the Markets is under direct threat by this proposal. The potential cost to the community has not been explored in the IP. The Markets require more than servicing access. Food shoppers need parking a lot closer than the 300-500m distance that planners have been using as a guideline. The States of Jersey have a statutory duty of care to manage the Markets for the benefit of the public. 8.44 - Detailed discussion with the freight service providers must be considered before Waterloo Street becomes the only HGV route for this section of town. 8.46 - Dumesq Street is a critical access point to trading in this area. Pedestrian safety issues should be demonstrated and alternative solutions discussed before businesses are threatened. 8.49 - These proposals need detailed explanation because they appear to be a significant step towards eliminating the car from St Helier despite a claim to the contrary. This should be rejected until a comprehensive transport and business plan are produced for St Helier. It is perfectly reasonable for Planning to create a vision of a car-less society because there are legitimate advantages to this. However there are also a myriad of disadvantages which must be objectively presented to enable the public to make an informed choice. The issues include important social and environmental concerns as well as the Island's economic welfare.			proposals contained therein to be publicly considered, debated and subjected to independent scrutiny, as evidenced by the consultation process on the draft Plan. This is a requirement of the Planning and Building (Jersey) Law 2002; Halkett Place: any pedestrian priority scheme for Halkett Place would need to be developed and considered having specific regard to the potential impact upon the viability of the current operation of the Central Market. The draft Plan acknowledges that the implications of any changes to traffic management in Waterloo Street would need to be identified, considered and assessed; Dumesq Street: the limited width of the pavements in Dumesq Street, whereby there is only just enough width to accommodate a single person and probably insufficient space to push a pram or wheelchair, present the challenge to pedestrian safety whereby vehicles and people are in very close proximity to one another, and where pedestrians may have to step into the road to pass each other. There are no specific proposals presented in the draft Plan, other than identifying the potential for this street to be the subject of further work to examine how pedestrian safety might be improved. The implications of any proposals for business would be the subject of detailed consideration, with local business and Chamber, as part of the development of any specific proposals. 8.49: the proposals set out here are drawn from the EDAW study, where they are set out. The proposals are also shown on the Proposals Map	
DP588		Deputy John Le Fondre			Pedestrian Priority	Neither	Ref para 8:45 onwards Pedestrian Areas - there are a number of proposals to pedestrianise various parts of St Helier. Whilst these may seem laudable		Noted	Pedestrianisation: the draft Plan contains no proposals for pedestrianisation. Proposal 18	The Minister is not minded to amend the draft

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							(particularly if they are of the quality of Broad Street / Charing Cross) it does serve to emphasise the need to ensure that we do retain significant parking provision in the Gas Place / Minden localities, in order to ensure adequate footfall in that part of St Helier.			puts forward proposals for the potential introduction of pedestrian priority, following further development, analysis and consultation; Policy TT10, and the supporting justification related to the North of Town, makes it clear that the existing off-street public parking provision in Gas Place (390 spaces) and Minden Place (240 spaces) should be replaced, should these sites be redeveloped.	Plan
DP180		Mr Stephen de Gruchy		Proposal 18	Pedestrian Priority	Supporting			Noted	Noted	Support is noted by the Minister
DP423		David Dodge	Vienna Bakery	Proposal 18	Pedestrian Priority	Objecting	I specifically object to the proposal to close Halkett Place (8.43) draft Island Plan (IP) and the strategic thinking behind this proposal because I believe it will seriously threaten the future ability of the Markets to operate in an effective manner to the detriment of the public. See attached letter	The aim of the proposed road closure is to reduce the impact on pedestrians by cross -town traffic. However, it risks driving heavy bag food shoppers away from the St Helier Markets if adequate, safe and convenient alternatives are not provided. St Helier must be accessible if it is going to be able to compete and adapt. The current parking provision for the north of town is insufficient. The draft IP and awaited Sustainable Transport Policy (STP) have used a benchmark of the existing car park provision as a target, when this is inadequate. The IP and STP appear to confuse essential food shopper traffic with commuters who may be better able and prepared to walk 300 to 500 metres from the bus stop or edge of town transport hub to their destination. It appears the consumer choice to buy fresh food on a regular basis throughout the week in St Helier in a Continental lifestyle is becoming an anti-social behaviour. There may be untried or ignored potential opportunities for the provision of parking that would interrupt the gyratory hunt for a parking space, before shoppers cars come to the core of town. The focus for car park provision appears to be confined to the Public land when private developers may have appropriate opportunities. There is reluctance in government to lose "control" of car park service provision. The Markets are still relevant to modern Jersey life. The Markets are protected buildings still fulfilling their original design function. They are incorporated in Jersey Law and the States of Jersey have a duty to manage them on behalf of the public. Market activities help give St Helier character and draw footfall. They are held in great affection by the local community and tourists.	Reject objection but note comment	Neither Proposal 18 or the supporting justification for it @ 8.43, where it relates to Halkett Place, contains any proposal to close the road. The supporting justification, at 8.43, specifically acknowledges the need for any pedestrian priority scheme to ensure that the character and vitality of the Central Market is retained and that provision is made for appropriate servicing arrangements.	The Minister notes the comments made but is not minded to amend the draft Plan



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								<p>They have recently received valuable maintenance. They represent the iconic home for the best in Jersey produce and provide consumer choice in price, quality, freshness and service. Small Jersey food producers (in which category I include farmers, fisherman as well as food handling trades) need the Markets. Jersey would not have the variety and quality of food production that it enjoys if it were not for the support local supermarkets give the food trades. However, with the best possible will, it can be impractical for the local supermarket buyers to support very small food processors. The Markets are ideal targets for small start up ideas and innovation. Could one imagine the outcome in today's climate, of attempting to "sell" the Jersey Royal potato as a new product to a supermarket buyer with the description of "genetic fluke with a relatively short shelf-life and a super premium price"? Jersey food producers pay local tax, provide provenance for their food, and are committed and accountable to their customers. The Markets provide an ideal opportunity for small and start-up businesses. Jersey cooks and restaurants need the Markets. The Markets provide a face-to-face contact for the consumer and food trade experts to exchange views. How should a food be kept, what are the best ways of preparation cooking, where does it come from, what are the seasonal variations and are there different varieties? This offers a knowledge bank for the consumer and invaluable marketing feedback for the trader. Food matters greatly to a large proportion of the Jersey public. Our difference to the UK is a positive selling point for the Island and a benefit to our way of life. The community as a whole needs to eat less processed and more fresh foods. The Markets have a lower reliance on pre-packaging, which allows produce to arrive in prime condition. Commercial diversity helps bring better food security for Jersey. Market traders by definition, have diverse marketing skills. They source produce from a wide range of suppliers which can bring advantages for their customers. The Markets help maintain and develop training for a wide food industry skill base for the Island. The contribution the Markets make to maintaining and potentially improving Jersey's carbon footprint is not discussed in the IP. It is centrally located for both freight in from the Port and the Island's road network for receiving local produce, and a short travel distance for a large proportion of the population. It makes little sense</p>			

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								to isolate the Markets. The full consequences of closing Halkett Place to traffic, failing to provide adequate parking provision and assuming the shopper will willingly walk up to 500 metres with heavy bags, represents for me, the planners crossing the line of acceptability. Where on this little Island, could this large area of food retail space be relocated and what damage to the community, should the existing Markets have a significant failure			
DP424		David Dodge	Vienna Bakery	Proposal 18	Pedestrian Priority	Objecting	I call for a thorough review of our strategic planning process, based on the principles of gathering objective evidence on the community's economic and cultural needs. See attached letter	Because I believe this task is not complete. I specifically object to the proposal to close Halkett Place (8.43) draft Island Plan (IP) and the strategic thinking behind this proposal because I believe it will seriously threaten the future ability of the Markets to operate in an effective manner to the detriment of the public. The aim of the proposed road closure is to reduce the impact on pedestrian s by cross -town traffic. However, it risks driving heavy bag food shoppers away from the St Helier Markets if adequate, safe and convenient alternatives are not provided. St Helier must be accessible if it is going to be able to compete and adapt. The current parking provision for the north of town in insufficient. The draft IP and awaited Sustainable Tran sport Policy (STP) have used a benchmark of the existing car park provision as a target, when this is inadequate. The IPand STP appear to confuse essential food shopper traffic with commuters who may be better able and prepared to walk 300 to sao metres from the bus stop or edge of town transport hub to their destination. It appears the consumer choice to buy fresh food on a regular basis throughout the week in St Helier in a Continental lifestyle is becoming an anti-social behaviour. There may be untried or ignored potential opportunities for the provision of parking that would interrupt the gyratory hunt for a parking space, before shoppers cars come to the core of town. The focus for car par park provision appears to be confined to the Public land when private developers may have appropriate opportunities. There is reluctance in government to lose "control" of car park service provision.	Reject	The proposals for pedestrian priority have emerged from work which has looked at the overall development of St Helier, based on the work undertaken by Willie Miller (St Helier Urban Character Appraisal: 2005) and EDAW (St Helier Development and Regeneration Strategy), the proposals emerging from which have been assessed and modelled by the strategic highway authority (T&TS), which is also responsible for the provision and management of public parking provision. As stated in the proposal, and the supporting justification, the development of specific schemes in relation to the streets identified will be the subject of detailed engagement and consultation, and the impact upon viability and vitality will be a material consideration	The Minister is not minded to amend the draft Plan
DP701		Mr Mark Syvret	Romerils	Proposal 18	Pedestrian Priority	Objecting	[Page 289 Proposal 17, Open Space Strategy. Page 308; sections 8.41,8.42, 8.46, 8.47 and Page 334 Policy TII3, Protection of the Highway Network.] 1. Dumaresq Street (west end) is annotated on the Draft Island Plan town Proposals Map as both a Primary Route network and a Potential Pedestrian Priority Street. How can a Primary Route only allow [8.42] cyclists, taxis, buses and trade deliveries? 2. [8.4 I] states "an extension of pedestrian priority is		Reject	The Plan makes it clear that there would need to be further development of these proposals into detailed pedestrian priority schemes, which would be the subject of further consultation, and which would need to take into account their impact upon existing commercial operations	The Minister is not minded to amend the draft Plan

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							considered necessary to support the viability and vitality of the town centre," [8.47] refer to Hue Street becoming a pedestrian priority street whereby access would only be for cyclists, taxis, buses and trade deliveries. Hue Street has wide pavements and a relatively low traffic volume , the majority of which is seeking access to Romerils and the collection point for Marks & Spencers in Dumaresq Street. 3. [Proposal 17.] How can partial pedestrianisation provide "quality open space" in this area? Whilst pedestrian safety is important we OBJECT to this proposal as access to our car park in Hue Street would therefore be impossible and our business would be severely hit. Suggested change: Do not partially pedestrianise. It is not needed.			and facilities. The redevelopment of off-street surface level car parking provision in St Helier is consistent with Policy TT10 of the draft Plan and has the potential to deliver a better environment in this part of the town, as identified in the EDAW report (p.49). Any potential changes to the management of traffic in the area may present opportunities to implement further environmental improvements in the street, as has been achieved in other parts of St Helier under the auspices of the Street Life Programme e.g. York Street, Charing Cross, Sand Street and Broad Street. The physical constraints of the western end of Dumaresq Street are self-evident and present vehicular and pedestrian conflict. It is, however, recognised, that Dumaresq Street provides, amongst other things, service access to major stores with frontages on King Street, as well as Romerils and, on this basis, Dumaresq Street is a significant part of the strategic highway network. Alternative access to Romerils and the rear of King Street stores is, however, available from Union Street. The implications of any changes to traffic management would need to be modelled and assessed in consultation with key stakeholders, including commercial operators in the area.	
DP924		mr daniel wimberley			Cycle Routes	Objecting	Proposed cycling networks and walking networks need to be thought through and created and then protected just there is a commitment to safeguarding open space and not "letting it go" (page 294) REC that the commitment to do this is written into the Plan, plus the provision that they be safeguarded, and planning decisions then have regard to these routes (NB most likely existing roads, of course)		Accept	The protection of the Island's footpath and cycle network is covered by Policy TT1	The Minister notes the comment but is not minded to amend the Plan and this issue is already dealt with (Policy TT1)
DP682		Pauline Harewood		Map 8.1	Eastern Cycle Route Corridor	Neither	happy with Eastern cycle route proposal but there is no proposal for a Western Cycle Route. ie from St Ouen's Bay to link into St Peter's track. There are several valleys exiting the bay which would lend	All routes out of the bay are steep hills, of varying gradients, which unless you are a mega fit cyclist, requires pushing your cycle some distance. A beautiful peaceful meandering route out of the	Noted	Policy TT3 would support and enable the development of other off-road cycle facilities anywhere in the Island, including any link	The Minister notes the comment made but is not minded

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							themselves to this facility.	bay (similar to the Railway Walk in St Brelade) would be wonderful. It would also make cycling for children safe as there would be no cars.		from St Peter's Village to St Ouen's Bay.	to amend the draft Plan
DP10		Mr Philip Johnson		Policy TT 3	Cycle Routes	Supporting	8.57 There should be a timescale for the minister to act. The sooner the better.		Noted	The implementation of the Eastern Cycle Route will be dependent on many aspects not least the definition of a route, and the availability of resources and the agreement of landowners and other local stakeholders. The Island Plan can provide a policy framework to support and enable the development of a route, but not to define the timetable for implementation, which is dependent upon many aspects out with the scope of the Plan.	The Minister is not minded to amend the draft Plan.
DP181		Mr Stephen de Gruchy		Policy TT 3	Cycle Routes	Supporting			Noted	Noted	Support is noted by the Minister
DP753		Paul Harding	The Association of Jersey Architects	Policy TT 3	Cycle Routes	Supporting	The AJA supports these Policies		Noted	Noted	Support is noted by the Minister
DP182		Mr Stephen de Gruchy		Policy TT 4	Cycle Parking	Supporting			Noted	Noted	Support is noted by the Minister
DP183		Mr Stephen de Gruchy		Policy TT 5	Road Safety	Supporting			Noted	Noted	Support is noted by the Minister
DP958		Deputy Philip Rondel	Parish of St John Working Party	Policy TT 5	Road Safety	Neither	Both 'Villages ' lie on important cross island routes. St John's Village lies on the main East - West route from St Ouen to St Martin as well as being the northerly point of the Grande Route de St Laurens from the South. Sion Village is on the main North - South route from Hautes Croix to St Helier. There are 30 mph limits in place in both 'Villages' but crossings for pedestrians, safe bus stops and lower speed limits or traffic calming measures may be required. Pedestrian safety is at risk in both Villages. The group wants to find out from parishioners ' their views on traffic and pedestrian safety, before making any recommendations. In the past parishioners have rejected changes to speed limits with the Consultation Zones albeit many have raised their concerns on this subject. Cycle safety and Safe Routes to school are also areas that the		Noted	Policy TT5 supports the introduction of traffic and pedestrian safety measures, and polices TT2 and TT3 support the creation of new facilities for pedestrians and cyclists. Some traffic management issues (e.g. speed limits) are out with the remit of the plan and are issues to be dealt with by the Island's strategic highway authority.	The Minister notes the comment in relation to this policy

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							Working Party will be consulting on. Early indications are that these are a high priority following comments received by the Working Party.				
DP184		Mr Stephen de Gruchy		Policy TT 6	Park and Ride	Supporting			Noted	Noted	Support is noted by the Minister
DP185		Mr Stephen de Gruchy		Policy TT 7	Better Public Transport	Supporting			Noted	Noted	Support is noted by the Minister
DP187		Mr Stephen de Gruchy		Policy TT 8	Access to Public Transport	Supporting	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
DP589		Deputy John Le Fondre		Policy TT 8	Access to Public Transport	Neither	Access to Public Transport - infers that some form of commuted payment might be required to fund public transport. To me this would seem to require the establishment of some form of endowment fund which could then generate income to provide such public transport facilities.		Noted	Any financial contribution to support the provision of public transport can be managed through the mechanisms already established for Planning Obligation Agreements, where a contractual arrangement is entered into to specifically establish the purpose and amount required to fund a specific element of work or service required to be provided in association with development activity (see Policy GD4).	The Minister notes the comments made but is not minded to amend the draft Plan.
DP751		Paul Harding	The Association of Jersey Architects	Policy TT 8	Access to Public Transport	Objecting	12.3 The AJA submits Objective TT1 and Policy TT8 puts the cart before the horse, through insisting that development forms and patterns are located near to existing Island Route network of public transport provision. The precept is we accept the existing transport system is all that can be achieved. Instead the AJA believes we should place housing in the most appropriate locations, then provide the transport system to serve those locations. 12.4 There is no justification for TT8 imposing a 400 metre limit on distance of new housing or employment related development from the current public transport service. The existing Island Network is not cast in stone.		Reject	The objective of Policy TT8 is not to constrain new development (where it accords with the Spatial Strategy of the Plan), where it is not within 400m of the existing public transport route network, but rather to ensure that the public transport route network is developed and enhanced to ensure that those locations most appropriate for development receive a better level of public transport provision than that which they might currently receive.	The Minister is not minded to amend the draft Plan
DP880		Mr	Health	Policy TT	Access to	Supporting	The presumption should be for new commercial		Noted	Noted	Support is noted



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		Stephen D Smith	Protection Services	8	Public Transport		development to contribute more to public transport use thereby reducing car use and reducing noise and exhaust emissions.				by the Minister
DP1062		Ray Shead	The Jersey Chamber of Commerce	Policy TT 9	Travel Plans	Supporting	<p>This policy is agreed with reservations. It is agreed that large developments of any type should be evaluated for their impact on traffic and note that schools are now recognised as having an effect on traffic. However, this policy TT 9 only mentions residential development with 50 or more units of accommodation. It is suggested that it should also include schools and offices. Residential development is far more difficult to provide a plan for as it is not a business with set working hours and its occupancy will determine the broad travel profile but will always be subject to random journeys because of its very nature. In terms of office development, members of Chamber have seen the reluctance of tenants to accept the imposition of travel plans which may have been accepted by the Developer during the planning process or the building may have changed ownership resulting in the recognition of a travel plan becoming diluted or obscured. The proposal to enforce the requirements is noted as is the statement that "Examples of enforcement might include the introduction of parking charges for staff". That proposal will prove extremely unpopular and unacceptable to building owners, occupiers and staff. The consequence of introducing monitoring and sanctions will be that new developments will be devalued in the eyes of potential tenants and the States will be required to create a new department to monitor and enforce travel plans. Whilst it is agreed that travel plans should be a requirement of the process, they should be structured in such a way as to provide a reasonable solution that does not require monitoring and sanctions. The provision of parking, charges for it and alternative types of transport should be part of a wider strategy for the Island and St. Helier which does not fall on the building owner.</p>		Note qualified support	<p>Policy TT9 would apply to all developments which generate significant amounts of travel and para. 8.33 of the supporting justification seeks to identify those types of development that might invoke this requirement. It is thus clear that the policy does not just apply to residential developments of over 50 units of accommodation and would embrace large office developments and schools. The objectives behind travel planning require some ownership and enjoyment from the users of buildings. It is a tool which seeks to influence behaviour. On these bases, there has to be a requirement to monitor their use and implementation. With changing users or occupants of buildings, there may be a requirement to amend Travel Plans to ensure that objectives and targets remain realistic: this will need to be done through negotiation and mutual agreement. The development of travel planning in Jersey is regarded as an integral element of the Island's Sustainable Transport Policy and will be managed between the departments of Planning and Environment and Transport and Technical Services within existing resources. It is acknowledged that there may be a requirement for further assistance and guidance on the development, implementation and monitoring of travel plans in Jersey.</p>	The Minister notes the qualified support for this policy but is not minded to amend the Plan
DP188		Mr Stephen de Gruchy		Policy TT 9	Travel Plans	Supporting			Noted	Noted	Support is noted by the Minister
DP1177		mr daniel wimberl			Parking	Objecting	REC Saving and re-allocating car-parking space in the town, and not all for housing, is another thing that should be in the Plan. Also REC the figures sent		Reject	The inefficient use of land for car parking is acknowledged in the draft Plan (@8.111) and the	The Minister notes the comments made

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		ey					to me in a recent Written Question about the spaces in town which could be freed up for development, their area and potential and value SHOULD BE stated clearly in the plan. As should the number of spaces controlled by the States in the parish of St. Helier, together with some serious discussion about the potential uses and value of these spaces. This is a land-use Plan, is it not? See 2.13 page 35 and 2.34 where the need to use land very wisely is correctly pointed out			development potential of some car parking space is also explicitly acknowledged (@ 8.114-8.115). Policy TT10 sets out a clear presumption in favour of the redevelopment of surface-level off-street car parks and presumes against the use of cleared sites for car parking on a temporary basis. The extent of car parking provision and its use is clearly set out in the draft Plan at 8.88 - 8.126.	but is not minded to amend the draft Plan as the issues raised are already adequately addressed.
DP1002		Captain Howard Le Cornu	States of Jersey Harbours		Public Parking Provision	Neither	There are currently only 50 car parking spaces at the existing Waterfront MSCP, not 150 as stated.	Policy should also specifically take into account parking for users of the port. Within the port operational area, priority must be firstly given to warehousing and trailer parking, then parking for other users of the port, and finally public parking. Parking for even for Port Users within the Designated Port Operational Area may be compromised by the priority ,need for warehousing and trailer parking.	Noted	The provision of parking at the Port of St Helier should reflect the use of the land and should be regulated through the development control process in accord with parking guidelines. The provision of any public parking at the Port should likewise seek to reflect the function of the port as one of the island's principal gateways, and should seek to meet the reasonable expectations of passengers and other users of the facility. The provision and management of any other public space should seek to contribute towards the States objectives of seeking to reduce the peak hour traffic flow and of encouraging more sustainable modes of transport.	Noted by the Minister
DP1061		Ray Shead	The Jersey Chamber of Commerce		Public Parking Provision	Objecting	8.97- The shopper is being caught up in the ambition to reduce commuter traffic by 15%. The policy to reduce car usage by deliberately not providing efficient and convenient shopper parking provision in St Helier is illogical and threatens services, environmental objectives and our economy. Whilst the commuter may benefit from a 300-500 metre walk from car park to destination, this is unacceptable for food shopping. 8.98 - 8.101. The base line provision of shopper parking is inadequate in this area. It is suggested that if the retail floor space of St Helier Markets were translated into a UK superstore, it would demand a car park 20% bigger than Minden Place MSCP. The NTMP was not instructed to find solutions to shopper parking because this was deliberately missing from its terms of reference. It is therefore implied that the strategic process is hostile to the		Reject	The draft Island Plan does not seek to reduce overall off-street public parking provision and does not seek to reduce the level of parking provision available to the shopper: it is a stated objective of the Sustainable Transport Policy to reduce peak hour traffic flow (which must be presumed to be predominantly commuters) and the Island Plan seeks to contribute towards this. The Plan seeks to ensure that the level of off-street public car parking presently provided by Minden Place is replaced. UK planning guidance (Planning Policy Statement 4: Planning for	The Minister is not minded to amend the draft Plan.

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							logistics of retailing, other than localised chance sales. 8.102 - 8.126 Much has changed in the international economic and local political climate since this consultation was first published. It is vital that the strategic planning process is well informed as to the economic and social consequences of its proposals and that we are following the best strategic planning practises available.			Sustainable Economic Growth, (29 December 2009)) defines, for retail purposes, a location that is well connected to and within easy walking distance of the primary shopping area as being within up to 300 metres. It is relevant to note that the Ann Court site is within 300 metres of the Central Market and within 100m of the edge of the Core Retail Area. This will provide a much larger facility than the existing Minden Place MSCP in that it also seeks to replace the existing public provision at Gas Place.	
DP590		Deputy John Le Fondre			Public Parking Provision	Neither	Ref para 8:98 Minden Car Park - I agree that the layout is inefficient. I am divided over whether all parking provision should be removed from this site. I think this overlooks the very important contribution to elderly motorists who find the car park very convenient for the Library, the Fish Market the Central Market and other facilities in that area. Even moving that particular provision a few hundred yards might well impact upon the utility of that service, again to the detriment of that area. I therefore lean towards retaining an element of parking at Minden, with some form of development (residential ?) on top. The design would need to be significantly better than at present to assist in the regeneration of the area. Talman parking - whilst not the direct responsibility of the States, I consider that private parking should (ideally) be replaced in the same area of Town.		Reject	The location of new public car parking to serve the North of Town will be determined as part of the NoT Master planning exercise. The existing Minden Place facility, whilst located close to the town centre, is relatively distant from the Ring Road, and thus serves to draw vehicular traffic through the town centre, which serves to undermine pedestrian safety and the quality of the town centre environment. In accord with the objective of seeking to reduce peak hour traffic flow; to encourage more sustainable modes of travel; and to reduce the inefficient use of town centre land for surface car parking, it is not proposed to replace the existing level of parking provision on the Talman site (ref Para 8.100). Whilst the comments about access for more elderly members of the community are noted, there are other shopper parking facilities in close proximity to the town centre e.g. Snow Hill and Sand Street, and the proposed re-introduction of the Town Hopper Bus may serve to provide a link between peripheral car parks and the town centre sites, such as the Central Market.	The Minister is not minded to amend the draft Plan.
DP1063		Ray	The	Policy TT	Off-Street	Objecting	This policy needs to be reviewed in light of no		Reject	There is no requirement to	The Minister is

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		Shead	Jersey Chamber of Commerce	10	Public Parking Provision in St Helier		progress with the Esplanade Quarter and Ann Court. There should not be a presumption against temporary car parking if it eases the current situation. Policy TT10 is now obsolete. A comprehensive review should now be initiated in partnership with the community and commerce			review car parking proposals for the Esplanade Quarter: the proposal is to ensure that the existing off-street public parking facility is replaced in the event that the site is developed, and this is considered to remain a valid and legitimate policy objective. Likewise, the proposal to develop a new public off-street parking facility at Ann Court remains valid in the sense that any new car parking provision for the North of Town needs to be based on a replacement on existing levels of provision and not on the provision of additional capacity. The exact location of any new replacement facility will be determined through the North of Town Master planning exercise, which is still ongoing. It is not considered appropriate that land is used, whether on temporary basis or permanently, for off-street public car parking as this only serves to undermine other stated objectives of seeking to encourage more sustainable modes of transport than the private car. There are also a number of instances around the town where temporary consents for a use of this nature can become semi-permanent, further undermining the objective of seeking to manage demand.	not minded to amend the draft Plan
DP189		Mr Stephen de Gruchy		Policy TT 10	Off-Street Public Parking Provision in St Helier	Supporting	Support with caveat I support this policy in all respects except for the final paragraph. As areas of current off-street private car parks are redeveloped, there would be merit in allowing other areas pending redevelopment to be used, temporarily, for private car-parking. Otherwise, unnecessary pressure may be put on existing public car parking sites. Perhaps setting a maximum time limit of, say, 2 years as a temporary car park might address the concern mentioned in 8.115 that allowing temporary car parking may act as a disincentive to the active redevelopment the site.		Note qualified support, but reject suggestion of allowing temporary use of cleared sites for car parking provision.	The relatively high level of car parking space in St Helier is considered to be a significant factor in influencing the scale of morning peak hour traffic flow into the town by private car. The use of land for private car parking in the centre of St Helier is also not an efficient use of land when there are greater needs to provide land for homes and public open space. As a general principle, therefore, it is not considered appropriate that land is used, whether on temporary basis or permanently, for an	The Minister notes the qualified support for this policy but is not minded to amend the draft Plan.

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										activity which can only serve to undermine other stated objectives of seeking to encourage more sustainable modes of transport than the private car. There are also a number of instances around the town where temporary consents for a use of this nature can become semi-permanent, further undermining the objective of seeking to manage demand.	
DP591		Deputy John Le Fondre		Policy TT 10	Off-Street Public Parking Provision in St Helier	Supporting	Replacement Parking - in my view it is critical that replacement parking is provided in this area of town.		Noted	Noted	Support is noted by the Minister
DP719		Mr Kenneth Renouard		Policy TT 10	Off-Street Public Parking Provision in St Helier	Neither	There is also not enough allocated cycle, motor cycle or car parking spaces for those that commute to work. An increased number of both cycle and motor cycle spaces may encourage commuters to take a 'greener' form of transport in the warmer months, which will reduce congestion on the roads, when the number of visitor cars on the road increases.		Noted	It is a stated objective of the Plan to encourage more sustainable modes of transport than the private car. On this basis, the Plan does not seek to increase the provision of more car parking spaces for commuters, which would only serve to undermine this objective. Policy TT4 of the Plan seeks to ensure the provision of new cycle parking in association with new development and as part of a parking strategy for the town of St Helier. The Plan does not specifically seek to encourage or provide for the provision of parking spaces for powered two-wheelers but regards this as an issue for the strategic highway authority in terms of the management of existing parking provision and the extent to which that space is dedicated to meeting the needs of motorcyclists compared to car drivers.	The Minister notes the comments made but is not minded to amend the draft Plan.
DP754		Paul Harding	The Association of Jersey Architects	Policy TT 10	Off-Street Public Parking Provision in St Helier	Objecting	12.7 There is a contradiction between earlier Policies of restricting new employment related development within St Helier and the 2009 Draft Plan policy of restricting St Helier public off-street parking facilities as well as refusing private car parking, in conjunction with the current ongoing reduction in public on-street parking. This will diminish St Helier's retail & commercial activity,		Reject	The ability to park is fundamental to the use of the private car and the availability of parking at the start and end of each journey is a critical factor in car use. As a means of seeking to reduce car use, specifically peak hour traffic flows, and to encourage the use	The Minister is not minded to amend the draft Plan



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							rather than enhance St Helier as the Island's vibrant business centre. It should be recognised the Island does not have a real traffic problem (there is very little congestion on the main arterial roads except short peak periods) and public transport is not the panacea for all travel issues.			of other, more sustainable modes of transport, it is considered appropriate to regulate the level of off-street public (and other) parking provision. It is acknowledged that there is a need to ensure that, as the Island's principal commercial and retail centre, St Helier remains convenient and accessible to use: to ensure the continued vitality and viability of the town centre's retail function there is a need to ensure appropriate levels of provision of shopper car parking space, relative to that which is available for commuters. This is, however, a matter of management of the Island's existing stock of off-street public parking provision by the strategic highway authority.	
DP592		Deputy John Le Fondre			Residents' Parking Zones	Neither	Car ownership - the paragraph talks about not encouraging car ownership, yet this appears to be in direct conflict with the remarks in 8.14		Noted	Paras 8.121-8.124 reflect what has happened in terms of the initiative being pursued by the Parish of St Helier to introduce Residents' Parking Zones. The draft Plan acknowledges that such schemes have the potential to increase car ownership but also have the potential to reduce the need for unnecessary trips.	Noted by the Minister
DP1064		Ray Shead	The Jersey Chamber of Commerce	Policy TT 11	Private Car Parks in St Helier	Objecting	This policy should be reviewed and fair competition should be allowed, as if not, it will appear that the States is seeking to protect its monopoly.		Reject	The presumption against the provision of further private non-residential car parks accords with the objective of seeking to manage levels of peak hour traffic flow and to encourage other, more sustainable, forms of travel, both of which have public benefit. The issue of competition, in relation to the provision of parking supply, is not material to a land use planning policy framework	The Minister is not minded to amend the draft Plan
DP190		Mr Stephen de Gruchy		Policy TT 11	Private Car Parks in St Helier	Supporting			Noted	Noted	Support is noted by the Minister
DP755		Paul Harding	The Association of Jersey	Policy TT 11	Private Car Parks in St Helier	Objecting	12.7 There is a contradiction between earlier Policies of restricting new employment related development within St Helier and the 2009 Draft Plan policy of restricting St Helier public off-street		Reject	The ability to park is fundamental to the use of the private car and the availability of parking at the start and end of each journey is a	The Minister is not minded to amend the draft Plan

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			Architects				parking facilities as well as refusing private car parking, in conjunction with the current ongoing reduction in public on-street parking. This will diminish St Helier's retail & commercial activity, rather than enhance St Helier as the Island's vibrant business centre. It should be recognised the Island does not have a real traffic problem (there is very little congestion on the main arterial roads except short peak periods) and public transport is not the panacea for all travel issues.			critical factor in car use. As a means of seeking to reduce car use, specifically peak hour traffic flows, and to encourage the use of other, more sustainable modes of transport, it is considered appropriate to regulate the level of private (and other) parking provision. The use of land for the purposes of private car parking is also considered to be highly inefficient, particularly where there is a need for land to be released to provide for new homes.	
DP191		Mr Stephen de Gruchy		Policy TT 12	Parking Provision Outside St Helier	Supporting			Noted	Noted	Support is noted by the Minister
DP756		Paul Harding	The Association of Jersey Architects	Policy TT 12	Parking Provision Outside St Helier	Objecting	It is strange the 2009 Draft Plan recognises the problematic lack of public parking within areas such as St Aubin, Gorey & Rozel and, rather than proposing a solution, derives a policy against provision of new public parking unless alternatives have been supported. The policy fails to recognise the benefits that can flow from adequate public parking in satellite centres such as St Aubin, where adequate public parking coupled with public transport to / from St Helier (park and ride) has the potential for eliminating peak hour congestion from the western residential areas to St Helier, in both directions.		Reject	The policy seeks to ensure that the private car does not dominate or destroy the environment which may generate the demand for car parking in the first instance, which would be contrary to the strategic objectives of the Plan to protect the natural and historic environment, and also to reduce our dependence on the car (SP4 and SP6). The Plan does seek to enable the provision of facilities related to the concept of park and ride, at Policy TT6, where it is appropriate to do so. It is also suggested, however, that given the often cited perception of a lack of parking to meet local demand in the picturesque, historic, environmentally sensitive and constrained landscape setting of St Aubin, the provision of parking facilities to ease congestion in St Helier in this location is not something that is likely to be easily achieved. In this context, it is relevant to note that there is a presumption against land reclamation, as set out at Policy WM9. It is also relevant to note that the existing transport infrastructure between St Helier and St Brelade in	The Minister is not minded to amend the draft Plan

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										particular, vis-à-vis the frequency of bus services and the availability of off-road cycling and pedestrian routes (provided by the Railway Walk and the Esplanade) probably provides the greatest level of choice of easy and convenient transport options, when considering more sustainable alternatives to the private car, than anywhere else in the Island.	
DP1162		Mr Kenneth Renouard		Proposal 19	Parking Guidelines	Objecting	With regard to the policies on the redevelopment of St Helier, I believe there is a need for more emphasis to be placed on the requirement for parking spaces for new residential developments.	At present town residents are isolated, as there is insufficient provision for visitor parking. The parish policy of creating residential parking zones has only exacerbated this isolation. Relatives and friends often have to park and walk 15 minutes or more. This I have experienced firsthand. Therefore new residential development should include a requirement to provide both resident and visitor parking spaces wherever possible. The Parish of St Helier should at least re-consider some of their residential parking zones that are further from Public Parking.	Reject	In order to reduce the increasing use of the private car, car parking standards are likely to be reduced. Provision will, however, need to be made, where appropriate, for adequate visitor parking. In St Helier, there also remains provision of public parking facilities which is available to car-borne.	The Minister is not minded to amend the draft Plan
DP192		Mr Stephen de Gruchy		Proposal 19	Parking Guidelines	Supporting			Noted	Noted	Support is noted by the Minister
DP193		Mr Stephen de Gruchy		Policy TT 13	Protection of the Highway Network	Supporting			Noted	Noted	Support is noted by the Minister
DP1004		Captain Howard Le Cornu	States of Jersey Harbours		Potential Schemes	Neither	Policy should include locating warehouses at the port and in the right location to reduce lorry movements on public roads.		Noted	The policy seeks to address where, on the public road network, potential major changes to the road network are likely to be required. Unless the proposal to relocate warehouses within the port is likely to create any such significant changes in road infrastructure, this comment is not relevant to this policy.	The Minister is not minded to amend the draft Plan.
DP194		Mr Stephen de Gruchy		Policy TT 14	Highway Improvements	Supporting			Noted	Noted	Support is noted by the Minister
DP948		Mr James Godfrey	Royal Jersey Agricultural & Horticultural Society		Air and Sea Travel	Supporting	Port relocation: The idea of moving the current port to La Collette is reasonable, not just because of land being released adjacent to the Waterfront, although from a planning perspective it must improve the offering of the Waterfront by not being adjacent to an industrial site, but also to enable usage by ships with greater displacements as is the		Noted	Noted	The Minister notes the support for the concept of relocating the existing port

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							trend with modern vessels.				
DP1006		Captain Howard Le Cornu	States of Jersey Harbours		Operational Development at Port of St Helier and Jersey Airport	Neither	Ref: 8.151: Incorrect - Freight into and out of Jersey is not generally declining. Overall it will grow in line with economic development and is directly linked to population growth. Ref: 8.152: Support This statement does not appear to be consistently taken into account throughout the rest of the plan. Ref: 8.153: Question - There are some very . Specific statements made I here without supporting evidence. e.g. Does the Island require 24 hour access for all i areas of the port? There are various implications to this statement including resource implications and , 'bad neighbour' impacts on surrounding property. Ref: 8.154: Clarification required As suggested above, a 'Jersey Harbours Regeneration . Zone' would ensure a co-ordinated approach to these issues Ref: 8.155: Incorrect statements made It is incorrect to state that revenues from the current port operation cannot support a major capital improvement, although it may not be funded through the normal capital programme. Ref: 8.156 supports: We agree with this statement however it is inconsistent with the rest of the document and needs to be carried through. It could also be supported by the re-inclusion of TI35 from the existing Island Plan. Ref: 8.157: Object: The port operational area is not defined in the Plan or on the Proposals Map. Ref: 8.158 Support: Ref: 8.159 Incorrect: Other marine activities are not considered elsewhere in the plan, specifically commercial fishing and marine leisure activities including the provision of marina facilities .		Reject	Annual tonnage in sea freight has dropped continually from 538,000 tonnes in 2000 to 395,000 tonnes in 2009 and thus the trend can only be described as 'declining', despite increases in population and economic activity over this period. These figures are published in 'Jersey in Figures' and are sourced from Jersey Harbours. No evidence to the contrary is provided. The policy regime provided by Policy TT35 of the 2002 Island Plan is replicated in Policy TT15 of the Draft Island Plan. The definition of the operational area of the Port is dealt with at TT15. Other marine activities, including fishing and fish farming and marine leisure and marinas, are dealt with in other parts of the Plan, specifically policies ERE8 and NE5 respectively	The Minister notes these comments but is not minded to amend the Plan
DP1007		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.
DP1065		Ray Shead	The Jersey Chamber of Commerce	Policy TT 15	Operational Development at the Port of St Helier and Jersey Airport	Supporting	Chamber supports the view that land for current and possible future operational function of Sl. Helier harbour and the airport is paramount over development for non-operational users.		Noted	Noted	Support is noted by the Minister
DP195		Mr		Policy TT	Operation	Supporting			Noted	Noted	Support is noted

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		Stephen de Gruchy		15	al Developm ent at the Port of St Helier and Jersey Airport						by the Minister
DP990		Captain Howard Le Cornu	States of Jersey Harbour s	Policy TT 15	Operation al Developm ent at the Port of St Helier and Jersey Airport	Objecting	There is no comment about a 'General Planning Order' for developments within the Designated Port Operational Area, which will give overriding planning guidance and ability to proceed with agreed 'Permitted Developments'.		Reject	It is considered that the policy regime conferred by draft Policy TT15 essentially provides a permissive framework for the operational development of the Port of St Helier, however, any such development proposals need to be considered on their merits and assessed, in particular, against other policies in the Plan, especially Policy GD1 and, where they affect structures and buildings of heritage value, Policy HE1.	The Minister is not minded to amend the draft Plan as the issues raised are already addressed
DP196		Mr Stephen de Gruchy		Policy TT 16	Aircraft Noise Zones	Supporting			Noted	Noted	Support is noted by the Minister
DP197		Mr Stephen de Gruchy		Policy TT 17	Airport Public Safety Zones	Supporting			Noted	Noted	Support is noted by the Minister
Natural Resources											
DP1163		Jason Simon	Simon Sand & Gravel	9	Natural Resources and Utilities	Neither		Having said that I'd like to take this opportunity to commend you and your many colleagues on putting together a Draft Island Plan that makes a serious attempt to control development at the outset whilst allowing future indicators, demands and trends to be taken into consideration during the development period. I have also previously mentioned my thoughts on this matter and allowing long term planning permissions to have a revision period built in, say 5 years from the end of the permit, to take account of changes in thinking, government plans etc, can only be a positive step forward.	Support noted	The option is always available for quarry operators to make new or revised applications in response to changing circumstances. In a similar vain, in view of the long-term nature of mineral operations, Policy NR9 'Restoration, Aftercare and After Use', allows for the submission of a detailed 'restoration and after use scheme' and changes to approved restoration schemes at a later date, to accommodate unforeseen circumstances.	Support is noted by the Minister
DP1179		Mr Roger Corfield		9	Natural Resources and Utilities		A small number of changes also need to be made to Chapter 9 (Natural Resources and Utilities), as follows: Page 355, para 9.13, second line Omit "...the Environmental Protection Team of the Planning and Environment Department.." and substitute with "Jersey Water" This is a request from Jody Robert. He makes the point that			Recommendation 1: On Page 355, para 9.13, second line Omit "...the Environmental Protection Team of the Planning and Environment Department..." and substitute with "Jersey Water" Recommendation 2: Page 357,	Officer updates noted and agreed



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							historically anything in a WPSA has gone to Jersey Water. EP do not want to see every planning application within a WPSA (i.e. 60% of apps). He screens the application list and the app team sends him any others they feel are relevant to him. Page 357, Proposal 20 Isn't this a policy? Page 369, para 9.52, first line Should read "principal" Page 377, Table 9, point 5 Omit "and" from the end of the sentence Page 380, Para 9.69, last sentence Should read "...estimates in Table 9.2 and..." Page 382, para 9.74, first sentence Should read "...factors that impact upon this." Page 385, Policy NR7, third para The end of the para should read "...any required 'Site Waste...". Page 388, Policy NR8, point 3 near the end Should read "...employment opportunities; and" Page 395, Policy NR11, penultimate line Should read "...essential for the proper..." For your information, I have received a detailed letter of representation from Simon Sand, which will take some thinking about. I assume you will want to register this.			Proposal 20 should become a policy and the third line should be amended to read: "...measures to help reduce water consumption and help conserve the Island's water resources" Recommendation 3: On Page 369, para 9.52, the first line should read "principal producers" Recommendation 4: On page 370, 9th line, omit the words "...in 2009". Recommendation 5: On Page 377, Table 9.1, point 5, omit the word "and" from the end of the sentence Recommendation 6: On Page 380, para 9.69, the last sentence should read "...estimates in Table 9.2 and..." Recommendation 7: On Page 382, para 9.74, the end of the first sentence should read "...factors that impact upon this." Recommendation 8: On Page 385, Policy NR7, the end of the third para should read "...any required 'Site Waste Management Plan". Recommendation 9: On Page 388, Policy NR8, the end of the second point 3 should read "...employment opportunities; and" Recommendation 10: On Page 395, Policy NR11, the penultimate line should read "...essential for the proper..."	
DP617		Jason Simon	Simon Sand & Gravel	9	Natural Resources and Utilities	Objecting		In previous correspondence I have commented on this policy at length. I will not go over these again except to highlight my objection to the continued reliance on the outdated suggestions, put forward by Arup's in their reports of the 1990's, by P&E. Particularly, the cessation date suggested for SS&G when it is clear that there will still be reserves available after this date.	Reject	The Jersey Mineral Study (1998) undertaken by Arup is a seminal work which provided the initial basis for the formulation of the original Jersey Mineral Strategy (2000) by the former Planning and Environment Committee. The Mineral Strategy was effectively adopted as part of the current Island Plan (2002). The new draft Plan incorporates a revised Mineral Strategy, which takes account of responses to the Green Paper and changing circumstances since 2002, including: subsequent planning permissions for mineral extraction; updated information	The Minister is not minded to amend the draft Plan

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										<p>on resource availability; recent UK Government guidance on minerals planning; and other matters referred to in the document. The proposed revised Mineral Strategy provides the framework for the policies in the draft Plan. It is significantly different from the original strategy, which looked to reduce extraction of primary aggregates locally and promoted a shift to bulk importation of aggregates. Most notably, the revised strategy looks to maximise local supply of rock aggregates. It is true that the revised strategy continues to include the winding down of sand extraction at Simon Sand and Gravel Ltd in St. Ouen's Bay by 2018. This has been the planning position and the expectation of interested parties since the Island Plan was approved by the States in 2002 (i.e. effectively giving 15 years notice). It is also worth noting that a similar policy was included in the St. Ouen's Bay Planning Framework, which was produced in recognition of the unique character of the Bay (1998). It is accepted that, for wider sustainability reasons, arguments can be made for maximising local sand production, where this is environmentally acceptable. However, any mineral strategy must aim to strike the right balance between the Island's needs for aggregates (including sand) and the need to protect the Island's local environment. The view has been taken and maintained that continued sand extraction at Simons would have an unacceptable impact on the sensitive and fragile coastal dune land character and ecology of the Bay and that importation provides a more acceptable alternative source. The Countryside Character Appraisal</p>	

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										(1999) explains the essential character of this part of St. Ouen's Bay, highlights the threat to local character from continuing sand extraction and calls for the highest levels of protection from development. It is worth noting that when the operator applied successfully for its latest planning permission in 2003 (P/2003/1318), which involved upgrading the works, it was opposed by an alliance of 5 of the Island's main heritage, conservation and environmental bodies. Whilst acknowledging that the company owns land immediately to the north of its permitted operational area (Field 246A) and there are other smaller fields nearby with the potential to supply sand, any proposals to extend operational activities are, on balance, not considered appropriate. It should also be borne in mind that if this additional land was used for extraction, it would only extend the life of the quarry by 10-12 years and, in any event, it will be necessary to shift towards importation of sand.	
DP621		Ms Sarah Le Claire		9	Natural Resources and Utilities	Objecting	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.	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	Reject	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 and, 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	The Minister is minded to amend the draft Plan to introduce a new policy to encourage energy efficiency in new development, otherwise the Minister is not minded to amend the draft Plan.

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								<p>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 priorities and that balance will have to be struck at some time in the future bearing in mind all the advantages and possible disadvantages of a particular proposal. There should, therefore, at least be a balancing statement or paragraph in this chapter to the effect that the value of secure and sustainable sources of energy will grow in importance throughout the coming century. These issues will no doubt be gone into in greater detail in the draft Energy White Paper - Fuel for Thought, which will be circulated later this year. If, however, the Island Plan is agreed as drafted then much of the discussion of utility scale renewable energy in the Energy White Paper will be rendered nugatory as the Island Plan will have already weighted the odds strongly against any such schemes. This would be a great pity as there is already a potential scheme for a wind farm off St Aubin's Bay. There is also quite a promising study on tidal energy off the north-east coast and there may well be others While it is no doubt politically reassuring to be able to point to all the conditions which would have to be met if any such schemes were ever to be realised it will also have to be understood that unless the States itself wishes to develop such schemes, utility companies operating in this area will be deterred by the defensive</p>		<p>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 be made. It is important to acknowledge that the Plan is a land use Plan and thus it is relevant and appropriate to clearly set out the parameters against which decisions will be made, which is what the draft Plan seeks to do.</p>	

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								nature of the decisions as they are currently drafted in the Island Plan			
DP757		Paul Harding	The Association of Jersey Architects	9	Natural Resources and Utilities	Neither	13.1 The 2009 Draft Plan gives no consideration to the benefits that would arise from careful reclamation providing additional Built-Up area in conjunction with landfill of countryside sites, the latter will only repair landscape character and create additional fields.		Noted	The relative merits of terrestrial landfill and marine land reclamation are set out in the Waste Management Chapter (paras. 10.87 - 10.110). Among the advantages of land reclamation discussed, is its ability to make available development land. Although the draft Plan gives priority the terrestrial landfill option, it does recognise that there may be instances where it is appropriate to support further land reclamation where it is proven to be in the Island's strategic interest. Policy WM9 provides for such an eventuality.	Noted by the Minister
DP365		Mr Paul Garlick			NR: Introduction	Objecting	Jersey Gas suggest that there is a change to policy context item 9.4 the first bullet point re "to introduce an integrated energy policy to secure and affordable and sustainable energy supply.....". There is a typing error here. However, our major concern is that the document "Fuel for Thought, Energy Policy Green Paper (September 2007)" may be used to inform the Island plan. Jersey Gas's suggested change would be to either commit to undertaking a significant review of the stance outlined in the "Fuel for Thought Energy Policy Green Paper (September 2007)" or to declare that the document is withdrawn, that it will not act to inform the Island Plan and a revised Energy Policy will be drafted. Jersey Gas have been informed by PED that a new Draft Energy Policy will be issued in the first quarter 2010 and it will have a different focus. However, as at the date of this communication the new Draft Energy Policy has not been issued to Jersey Gas.	As highlighted above in item 1, the document "Fuel for Thought, Energy Policy Green Paper (September 2007)" assigned what we consider to be an inappropriate carbon intensity to imported electricity. The document went on to discuss and promote fuel switching to electricity for heating purposes. Given that Jersey is a small and limited market such a policy direction could lead to the withdrawal of competing fuel(s) in the short term which would actually undermine the stated Energy Policy objectives. It would undermine security by reducing the diversity of the fuels available, act to increase energy prices on the Island (electricity is not the cheapest fuel now, European generated electricity is likely to rise in price in real terms in the future) and it acts to promote a wasteful form of energy (grid electricity is not sustainable now nor is it likely to be for the foreseeable future). Also as highlighted in item 1, specifically related to the objective NR1, we are of the opinion that the direction set by the Energy Policy Green Paper (September 2007) will undermine the incentives to promote renewable energy and not as the objective requires "encourage the use of renewable energy". Jersey Gas's position with regard to Jersey's Draft Energy Policy (September 2007) is outlined in a presentation attached to this document as appendix 1.	Reject	The respondent makes many detailed and technical challenges to information that is not presented in the Island Plan Green Paper and that are not relevant to this review. There is considerable discussion with all the fuel industry stakeholders in the ongoing development of the Energy White Paper of which the Jersey Gas Company is fully involved. These discussions are considering the assertion by Jersey Gas that the department should not accept the legally declared carbon intensity of electricity supplied to Jersey by EDF. The respondent is incorrect in asserting that the forthcoming Energy White Paper will promote fuel switching to electricity. These issues are better dealt with in the context of the Energy White Paper as are the potential challenges in realising utility scale renewable energy for Jersey. The Island Plan simply provides a spatial planning framework within which to consider applications for renewable energy installations should they come forward over the lifetime of the Plan.	The Minister is not minded to amend the draft Plan



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DP1164		Mr Howard Snowden	Jersey Water	Objective 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."
DP198		Mr Stephen de Gruchy		Objective NR 1	Natural Resources and Utilities Objectives	Supporting			Support Noted	Noted	Support is noted by the Minister
DP370		Mr Howard Snowden	Jersey Water	Objective NR 1	Natural Resources and Utilities Objectives	Neither	We are pleased to see that as part of this objective, the protection of the Island's water resources is included, however, there is no mention of the ongoing diffuse pollution of water from nitrates and any action plan on how to overcome this problem.		Support for the objective of protecting the Island's water resources is noted.	Through Policy NR1, the draft Plan looks to protect the Island's water resources (sea, surface water and groundwater) from any development which can adversely affect their quality. It is true that diffuse water pollution from nitrates (i.e. the cumulative effect of day to day activities over a large area, rather than from a point source) is not specifically mentioned in the Plan. It is also accepted that the Island needs to start making progress in addressing diffuse sources of pollution (such as nitrates), which are a major risk to water quality. However, this is not regarded as a matter for strategic land use planning policy, beyond what the draft Plan provides for. Nitrates are among a number of substances that are responsible for water pollution, albeit, they are probably among the principal causes of water degradation locally and present one of the greatest threats to nature conservation (through enrichment of water - eutrophication) and drinking water sources (through contamination). Nitrates are a	The Minister notes the comments made but is not minded to amend the draft Plan

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										major component of many fertilisers and a natural product of the breakdown of organic matter. It seems likely that most nitrate pollution in the Islands groundwater etc originates from intensive farming activities (growing and livestock), which are outside the control of the Island's Planning Law. Where developments requiring planning permission would give rise to nitrate pollution (e.g. by reason of their waste water discharge or surface water run off), they will be governed by the requirements of Policy NR1 'Protection of Water Resources'. Where planning permission is not required, reliance will have to be placed on the 'Water Pollution (Jersey) Law, 2000, or other non-land use planning controls and mechanisms to protect water quality from contamination. As most diffuse pollution of water from nitrates originates from agricultural land, the solutions will involve, among other things: - improved controls over the application of fertilisers to land; - promoting good agricultural practice; and - encouraging catchment sensitive farming (involving careful management of land sensitive to the ecological health of the water environment). None of these potential solutions fall within the role of land use planning under the Island's Planning Law.	
DP1068		Ray Shead	The Jersey Chamber of Commerce	Indicator s NR 1	Natural Resources and Utilities	Supporting	Chamber supports this drive but there has been little evidence of the States driving to achieve this or even set ambitious targets.		Noted	The success or otherwise of the Plan in meeting these objectives will be judged by annual monitoring of key indicators. This will allow for the review of policies which fail to perform satisfactorily.	Noted by the Minister
DP266		Mr John Banks			Water Resources	Neither	I have not seen the Island Plan but for many years, we have greatly exceeded the amount of fresh WATER on Jersey, and I assume that the authors of that plan have also taken water very much for granted, if it has been considered at all. After the		Comment Noted	The Plan does address water resources. There is a recognised need to address increased demand for this precious commodity and a requirement to:	Noted by the Minister

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							earthquake at Haiti, the water requirement of 80,000 to 90,000 residents must surely come before the water required to build houses (mining cement etc) out of the total rainfall received by Jersey" each of the 10 years. I1e cannot live very long without water but we cant-live well enough without houses! Incidentally, the Meteorological Department can barely get a 24 hour weather forecast right, so I very much doubt whether the authors of the Island Plan have got their 10 year forecast right! See attached letter			-reduce wasteful use of expensive treated potable water; and - lessen the pressure for the development of new water resources (e.g. new reservoirs). Policy NR1 looks to protect the quality and quantity of water resources and Proposal 20 aims to encourage water conservation. Para. 9.8 of the draft Plan refers to previous advice to the Council of Ministers that projected water demand to 2035 could be accommodated within the existing service infrastructure. However, Jersey Water is now looking at the possibility of extending Val de La Mare Reservoir at some point in the future. The company's other plans for the introduction of metered supplies Island wide should have a significant impact on reducing treated water consumption. See also response to DP1077	
DP1022		P Le Saux			Protection of Water Resources	Objecting	General concerns regarding ability of plan and planning officers to control development in the countryside and manage water resources. see attached letter		Objection noted	Environmental Protection are in the business of working towards a healthier Island environment. We would assume that the pollution incidents were historic and that he is now aware that there is a dedicated Pollution Hotline in place (709535). There is also suitable, proportionate, and enforced legislation in place to deal with the problems he has encountered. Environmental Protection, the regulator of the Water Pollution Law (among others) are able to comment on planning applications and Environmental Impact Assessments with an aim of pre-empting potential pollution issues and ensuring adequate thought is put to mitigating against them from an early stage.	Comments noted by Minister but minded not to amend plan
DP371		Mr Howard Snowden	Jersey Water		Protection of Water Resources	Neither	The ongoing diffuse pollution of both surface and ground water resources from nitrates is an issue for both Jersey Water and private water supplies. There is no mention of this within the Island Plan. The levels of nitrates recorded in most water		We would accept these points as noted.		Noted by the Minister

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							resources during the spring months are above the 50 mg/l limit. Jersey Water has time-limited dispensations under the Water (Jersey) Law 1972 which allows nitrate levels in treated water to be above 50 mg/l, but not exceeding 70 mg/l for 30% of its annual regulatory samples. The present dispensation period (which is the second) is for 5 years duration and expires on the 31st December 2013. Continuing dispensations may not always be forthcoming in future years and action needs to be planned to make serious efforts in reducing nitrate levels in water resources. Since the introduction of the Water Pollution (Jersey) Law 2000, Jersey Water has advocated the designation of Water Catchment Management Areas (WCMA) under the law, in order to reduce nitrates and improve the quality of water resources. We should like to see reference made for the need to reduce nitrate levels in water resources and the plans that the States have for the designation of WCMAs to achieve this, included within the NR1 objective. We would re-iterate our suggestion that the protection of water resources from diffuse nitrate pollution, under the Water Pollution (Jersey) Law 2000 and the possible use of WCMAs to achieve this, is included in Clause 9.11. In Clause 9.12, it is stated that Water Catchment Management Areas (WCMAs) have been 'explored'. The context in which WCMAs are mentioned in this clause can be interpreted as such that they are not being considered further. This is contrary to the fact that the Water Resources section is currently undertaking a field trial in the Val de la Mare catchment to study the effect of controlling the amount of fertiliser applied to the fields. We note that in Clause 9.13 the Environmental Protection Team is consulted on proposed developments within the Water Pollution Safeguard Areas (WPSA). Jersey Water was instrumental in the setting up of the WPSA in 1987 and at present we too are consulted when applications are made for developments in these areas. We should like to continue to be consulted on such applications, to ensure the continued protection of water resources.				
DP769		P Le Saux			Protection of Water Resources	Neither	think that all streams that discharge into the sea via escarpments and valleys should be given National Park Status. I think a further study of these streams should be made to understand the exact role they play from the exact extent of the catchment areas that create them through the wetlands water meadows, ponds or pond reservoirs created by farmers for watering their crops, nature walks before discharging into the sea. eg St Ouens Marsh -	If we do not understand the workings, the importance and the full extent of the wetlands and catchment areas of these streams we will end up with no stream, no pond/reservoirs, no nature walks and no nature. This is contrary to Policy NR1 (to protect the Islands water resources including surface and groundwater quality through prevention and inappropriate development and encouragement of water conservation measures)	Reject	The extent of the National Park boundary has been determined having regard to the Countryside Character Appraisal (LUC, 1999) and includes those character areas of the highest quality which warrant the highest level of protection from development. The character areas reflect	Noted by the Minister, but minded to reject proposed changes to Plan

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							starts St Ouens Parish Hall to La Salione. Rozel Manor Valley - starts west if rue du Hucquet to St Catherines. Le Couperon - starts La Rue des Pelles to Rozel Bay Mourier Valley - starts La Maison, St John to Les Mouriers Greve de Lecq - starts St Marys Village to Greve de Lecq	By recognising the catchment areas and protecting them from being turned into housing estates. I think it would be of more benefit to the island just in the amount of water it saves. Having followed the St Ouens Marsh stream in detail your Plan 2009 has not given these streams the recognition they deserve.		different landscape types, but have been determined through a detailed comprehensive study of a range of natural features and attributes and the relationships between physical and cultural influences. Whilst a further study of the Island's streams has much merit, for land use planning purposes, the Countryside Character Appraisal is regarded as providing a sound and objective basis for determining protective countryside zones. The extent of the proposal Coastal National Park actually includes valleys which are contiguous with the coastal areas, including the north coast valleys (e.g. Les Vaux de Lecq and Mourier Valley), the St. Martin's Valleys (e.g. Rozel Valley and St. Catherine's) and the valleys leading from the St. Ouen's Bay Escarpment. In any event, the St. Ouen's marsh area and stream is largely protected by draft Green Zone Policy and any larger housing developments will need to satisfy Policy NR1 'Protection of Water Resources'.	
DP899		P Le Saux			Protection of Water Resources	Objecting	I notice on your plan that C3 Map 2.2 page 91 does not give a complete picture of one of the most important streams in St Ouen. On your large scale map, C3 extents only half way up the road from La Saline to St Ouens Parish Hall. The stream has a catchment area beyond Route de Trodez to the north, Route de Vinchelez to the east and beyond Rue a L'eau to the south. All the streams and historic stone dams pass water through the wetlands and St Ouens Marsh, which is situated on both sides of the Route de Marias, area before discharging on to the beach at La saline. I would like to see a Open Space/Buffer Zone minimum 300m formed on either side of the stream and associated streams extending from the Parish Hall to La Saline and these wetlands and catchment areas preserved and protected.	If we do not understand the workings, the importance and the full extent of the wetlands and catchment areas of these streams we will end up with no stream, no pond/reservoirs, no nature walks and no nature. This is contrary to Policy NR1 (to protect the Islands water resources including surface and groundwater quality through prevention and inappropriate development and encouragement of water conservation measures) By recognising the catchment areas and protecting them from being turned into housing estates. I think it would be of more benefit to the island just in the amount of water it saves. The pond/reservoirs store some of the water passing through and introduce pond life to the area. The Island Plan 2020, protects this area, La saline to St Ouens Parish Hall, by including it under the umbrella of Green Zone and Agricultural Land as it was highlighted by the colour of the maps the proposed Island Plan 2009 disappoints me due to the fact it is not highlighted on your large scale Plan and the that Area C3 stops a long way short. This is not a forward step this is a backward step.	Comments Noted	See response to DP769 above. Map 2.2 on page 91 of the draft Plan shows the different character types identified in the Jersey Countryside Character Appraisal, based largely on landscape forms and a range of environmental and cultural assets and influences. It is accepted that the St. Ouen stream has a catchment area which extends well beyond the identified boundaries of the C3 character area (St. Ouen's Bay Escarpment and Valleys), but this additional catchment area falls into a different character area (E1 North-West Headland - St. Ouen). Contrary to what is inferred, the draft Plan protects the additional catchment area by its inclusion in the Green Zone, with its restrictive policy, just as in the	Noted by the Minister



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								Until now this Area has been protected for two reasons A planning dispute was settled about 1973 by the first ombudsman panel ever held with reference to planning and development, States members, Parish Officials and other parties formed the panel. The outcome was declared that the East boundaries of fields 422 and 423 were to be the end of the building line of the St Ouens Village development and no development would be allowed beyond this line because it would be classed as an extension into the countryside and that the area was to be classed as a very sensitive area due to the close proximity of the marsh, ie a Buffer Zone was created around the Marsh. Recently Planning refused a building application in this area because the site was in an area of open and natural land with an environmentally sensitive location which would result in the creeping domestication and permanent loss of an area of open land which would be harmful to the natural character of the immediate vicinity.		current 2002 Island Plan. Irrespective of what may have been decided by certain parties in 1973, for land use planning purposes, it is the Island Plan, approved by the States, which sets the framework for the development and use of land in Jersey. It is the most important document for the planning and use of land and lies at the heart of the Plan-led system.	
DP1069		Ray Shead	The Jersey Chamber of Commerce	Policy NR 1	Protection of Water Resources	Supporting	This issue must be placed far higher on the Environmental Agenda than it has been to date.		Comment Noted		Support is noted by the Minister
DP372		Mr Howard Snowden	Jersey Water		Water Conservation	Supporting	We note and welcome the proposals to improve water efficiency and conservation. Jersey Water will be commencing a water efficiency campaign alongside its plans to introduce universal metering. The campaign will promote the benefits of using water-saving domestic devices and we shall also be giving advice on water saving tips. Water audits will be offered to commercial customers with the aim of reducing water wastage. We welcome Proposal 20 - Water Conservation, which will require new developments greater than 1,000 m <sup>2</sup> or 10 dwellings, to have a 'water conservation strategy'. We would also recommend that such developments include provision for collection and storage of roof drainage water for external uses such as garden watering. Such installations would have the dual benefit of attenuating surface water drainage flows and reducing the demand for treated water in the summer months due to garden watering.		Support Noted	Notes: Proposal 20 places emphasis on reducing and managing demand for water. The recommendation that provision be made for the collection and storage of roof drainage, is addressed in the supporting text for Proposal 20 (para.9.18, 4th bullet point) among a list of potential water saving measures. The storage of rainwater for later use is also prominently highlighted in the drainage hierarchy set out in Policy LWM3 'Surface Water Drainage Facilities' (p.457). It is questionable whether Proposal 20 'Water Conservation' is or should be a policy!	Recommendation 1: On Page 357, Proposal 20 (Water Conservation) should become a policy.
DP199		Mr Stephen de Gruchy		Proposal 20	Water Conservation	Supporting			Support Noted	Noted	Support is noted by the Minister
DP35		Mrs ani Binet			Energy Resources	Supporting	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	It would increase the energy efficiency of new buildings and decrease the islands dependency of fossil fuels and imported nuclear energy thereby	Noted	More detailed policies encouraging renewable energy technology in new builds are	The Minister is minded to amend the draft Plan to

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							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 that installing these new technologies on buildings later on.	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'.		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).	require new development above a specified threshold to incorporate 10% renewable energy production.
DP366		Mr Paul Garlick			Energy Resources	Objecting	Item 9.20 remove the comment with regard to imported electricity being 90% free from fossil fuel emissions. Item 9.21 remove reference to the Energy Policy Green Paper (September 2007). Item 9.22 modify to exclude the suggestion that Jersey's Draft Energy Policy of September 2007 would achieve secure, affordable and sustainable energy and remove reference to the options put forward by the Green Paper. Item 9.23 modify to refer to a future Energy Policy direction promoting sustainable energy solutions and commit to a full reassessment of the location of the fuel farm and the necessary future appropriate storage capacity for hydrocarbon fuels. Item 9.24 and 9.25 to change text to adopting a more realistic stance, a stance that recognises that electricity is imported from Europe has a significant carbon footprint	Item 9.20 as indicated in items 1 and 2 above the Draft Energy Policy of September 2007 makes inappropriate assumptions about the carbon footprint of imported electricity. Item 9.21 Jersey Gas have been told by PED that the Energy Policy Green Paper (September 2007) is to be withdrawn and replaced with a new Draft Energy Policy in the first quarter 2010 which will have a different focus. Item 9.22 as highlighted Jersey Gas have been told by PED that the Energy Policy Green Paper (September 2007) is to be withdrawn and replaced with a new Draft Energy Policy in the first quarter 2010 which will have a different focus. Also as evidenced in this document and the attached presentation, included as appendix 1, Jersey Gas are of the opinion that the Green Paper of 2007 would not achieve secure, affordable and	Reject	The respondent suggests that the Energy Policy Green paper 'Fuel for Thought' (sept. 2007) has been withdrawn and thus comments referring to it should be removed. This is not the case. The Green Paper was a consultation document that still stands but the forthcoming Energy White Paper will develop the thinking put forward in the options Green Paper. P157/2009 is referred to and this was defeated in the States although the Minister has expressed that he would welcome solutions from the industry in relation to	The Minister is not minded to amend the draft Plan

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							particularly marginal loads such as that of Jersey and even more specifically heating load.	sustainable energy for the Island. Item 9.23 as highlighted Jersey Gas do not feel it is appropriate to refer to the Energy Policy Green Paper (September 2007) as we have been told by PED is to be withdrawn and replaced with a new Draft Energy Policy in the first quarter 2010 which will have a different focus. Jersey Gas believe that any new Draft Energy Policy that dovetails with other Islands strategies should commit to reassessing the location of the fuel farms and hydrocarbon fuel storage capacity. Such an assessment should look into the full benefits of hydrocarbon pipeline connections to Europe. The current situation is that PED have advised Members of the States of Jersey not to undertake such a review. Jersey Gas are of the opinion that PED's position as expressed through the Minister for the Planning and Environment ahead of the States debate on the proposal Natural Gas Pipeline; Strategic Study (P.157/2009), had views that could be challenged. See appendix 2 in which the Minister's opinions are recorded along with Jersey Gas's comments. Item 9.24 Jersey Gas believe that the comment with regard to moving away from imported hydrocarbon fuels is or may be a reference to fuel switching to grid electricity as promoted by the Draft Energy Policy Green Paper (September 2007). Fuel switching to grid electricity will not move the Island away from hydrocarbon fuels, as stated circa 50% of electricity generated in Europe is from hydrocarbon sources. Item 9.25 Jersey Gas believes that the comment suggesting renewable energy at the utility scale is entirely possible over states the current situation. We believe that readers should be presented with information with regard to the technical challenges, the potential costs, problems associated with and likely timescales for renewable energy at the utility scale.		improved fuel security. The respondent makes many detailed and technical challenges to information that is not presented in the Island Plan Green Paper and that are not relevant to this review. There is considerable discussion with all the fuel industry stakeholders in the ongoing development of the Energy White Paper of which the Jersey Gas Company is fully involved. These discussions are considering the assertion by Jersey Gas that the department should not accept the legally declared carbon intensity of electricity supplied to Jersey by EDF. The respondent is incorrect in asserting that the forthcoming Energy White Paper will promote fuel switching to electricity. These issues are better dealt with in the context of the Energy White Paper as are the potential challenges in realising utility scale renewable energy for Jersey. The Island Plan simply provides a spatial planning framework within which to consider applications for renewable energy installations should they come forward over the lifetime of the Plan.	
DP419		Mr Marc Burton	Institute of Directors		Energy Resources	Neither	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	See attached letter	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. To actively promote energy efficiency in new buildings it is considered appropriate to incorporate a new policy in the	The Minister is minded to amend the draft Plan to require new development above a specified threshold to incorporate 10% renewable energy production.

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							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			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).	
DP602		Mr Paul Le Claire			Energy Resources	Neither	Funding for the life of the plan by making sure that any renewable energy policy is environmentally licensed and led with money ensuring a PLACE in Jersey for strong environmental solutions by being licensed by planning and paid through the department		Noted	The Tidal Power Commission will be putting forward recommendations to the Minister for Planning and Environment for the development, licensing and consenting of renewable energy. The development of a detailed renewable energy policy is being undertaken by the Tidal Power Commission who will advise the Minister for Planning and Environment. The Minister is likely to then take a Report and Proposition to the States that will establish support for the principle of developing renewable energy and the appropriate regulating, consenting and licensing regime that should support this.	Noted by the Minister
DP48		Mr Jamie Copsey			Off-shore Renewable Energy	Supporting		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-ridden. What we consider now to be a visual scar, in time becomes a point of interest. Wind turbines on the sutra	Noted	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	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

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								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.		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 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% 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).	incorporate 10% renewable energy production.



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DP200		Mr Stephen de Gruchy		Policy NR 2	Exploratory, appraisal or prototype off-shore utility scale renewable energy proposals	Supporting			Noted	Noted	Support is noted by the Minister
DP201		Mr Stephen de Gruchy		Policy NR 3	Off-shore utility scale renewable energy development	Supporting	Support with caveat Due to the potential huge impact of such schemes (visual, on the marine environment, etc) I think the policy should make the holding of a public enquiry mandatory.		Rejected	The respondent calls for a public enquiry in the case of an application coming forward for a renewable energy installation. An Environmental Impact Assessment would be mandatory for any such application and this includes a significant amount of stakeholder consultation but there remains the potential for the Minister to call a Public Enquiry if a scheme was of a sufficient scale and impact. An Environmental Impact Assessment is mandatory for an application for renewable energy and will take into account the many areas outlined in the policy. EIAs are transparent processes that include stakeholder involvement at all stages so the final EIA should represent the results of an iterative process. However, the Minister for Planning and Environment may decide that an application is of sufficient impact and scale that a Public Enquiry is warranted and thus the policy as written does not preclude the potential for an enquiry to be called. To make a Public Enquiry mandatory as requested does not take into account that it might not be warranted depending on the type of application received but also does not preclude it.	The Minister notes the comments made but is not minded to amend the draft Plan
DP632		Richard Plaster	Jersey Electricity plc	Policy NR 3	Off-shore utility scale renewable energy	Supporting		We note the comments on the potential for wind power, tide power etc. Over the coming decade or so, we expect these technologies to emerge in Channel Island waters - although there is presently considerable risk and uncertainty with such	Reject	Concern is expressed that there National Park Status would exclude renewable energy applications in offshore waters along with the necessary	The Minister is not minded to amend the draft Plan

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					development			ventures (technical, commercial, regulatory, political risk etc). We would however be concerned should proposals for national parks etc. preclude large areas of the offshore resource from being available (or being made available on an economic basis) for new technologies as they emerge. In this regard we also need to consider that any renewable resource held offshore will require cabling to land power ashore with associated infrastructure at landing points.		associated infrastructure. It is not expected that National Park Status will limit potential applications from progressing assuming that an acceptable Environment impact Assessment accompanies an application. It is not intended that National Park Status would exclude renewable energy applications in offshore waters along with the necessary associated infrastructure. The Department remains committed to forwarding renewable energy subject to evidence that there is not an unacceptable impact on the natural environment. The latter would be assessed by an Environmental Impact Assessment and perhaps even an Examination in Public should the scale and potential impact of the project be deemed substantial enough.	
DP949		Mr James Godfrey	Royal Jersey Agricultural & Horticultural Society	Policy NR 3	Off-shore utility scale renewable energy development	Supporting	Energy: There will be an increasing need to develop renewable energy sources in future and any restriction on their development would be unwise at this stage. Current opinion indicates that wave and tidal energy offer the best potential which have less visual impact but nevertheless will require careful consideration of other impact.		Noted		Support is noted by the Minister
DP871		Mr Stephen D Smith	Health Protection Services		On-Shore Renewable Energy	Neither	We agree that Jersey should consider renewable forms of energy and in particular tidal energy as Jersey's large tidal range makes it attractive as a test-ground for proving tidal technologies. We would be concerned about on land wind farms because of the low frequency noise associated with them. There needs to be an agreed mechanism as in the UK where electricity generated by for example domestic apparatus can be sold back to Jersey Electricity Company as this is not possible at present.		Noted	The Plan acknowledges that there is not the capacity for on-shore utility scale wind installations. The capacity to sell renewably generated electricity back into the local grid does exist locally but it is acknowledged that the current situation needs to evolve and this is addressed in the draft Energy Policy White Paper The Plan acknowledges that there is not the capacity for on-shore utility scale wind installations. The capacity to sell renewably generated electricity back into the local grid does exist locally but it is acknowledged that the current situation needs to evolve and this is addressed in the draft Energy Policy White Paper	Noted by the Minister
DP1070		Ray Shead	The Jersey	Policy NR 4	Proposals for on-	Neither	A macro scale review should be encouraged and form part of an overall process and strategy for the		Noted	The Energy Policy White Paper will address the potential for	Noted by the Minister

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			Chamber of Commerce		shore renewable energy production		Island.			renewable energy in detail and provides more detailed policies in respect on on-shore renewable energy	
DP202		Mr Stephen de Gruchy		Policy NR 4	Proposals for on-shore renewable energy production	Supporting			Noted	Noted	Support is noted by the Minister
DP203		Mr Stephen de Gruchy		Policy NR 5	Safety Zones for Hazardous Installations	Supporting			Support noted	Noted	Support is noted by the Minister
DP258		Mr Colin Myers		Policy NR 5	Safety Zones for Hazardous Installations	Supporting	<p>The States of Jersey Fire and Rescue Service should be noted as the regulator and consultee for the Fuel Farm at La Collette and the Airport Fuel Storage facility with the Health and Safety at Work Inspectorate noted as the regulator and consultee for the LPG storage sites at La Collette and Les Ruettes St John. The Home Affairs Department should be noted as the regulator and consultee for the explosives site at Crabbe. In addition to proposals for new developments at La Collette being referred to the Health and Safety at Work Inspectorate and the States of Jersey Fire and Rescue Service, proposals should also be submitted to the La Collette Hazard Review Group, which is a working group consisting of stakeholders from both States Departments and operators of the major hazards. Reference to consultation being made with the Health and Safety Executive should be replaced by consultation with the Health and Safety at Work Inspectorate.</p>	<p>To reflect the arrangements for regulating the major hazards sites and to include the Hazard Review Group in the consultation process for La Collette. The clarify the legal responsibility for regulating the hazardous installations at La Collette, the Airport and Crabbe. To correct the reference to the 'Health and Safety Executive' following comment from the UK Health and Safety Executive</p>	Accept suggested changes	For the reasons set out by Mr Myers.	<p>Recommendation 1: Amend from the end of the third sentence of para. 9.41 to read:" Proposals for new development at La Collette will be considered within the context of this work. They will be assessed in consultation with the Health and Safety at Work Inspectorate, the States of Jersey Fire and Rescue Service, the La Collette Hazard Review Group and other La Collette users, as appropriate, against the current Health and Safety Executive's Planning Advise for Developments near Hazardous Installations (PADHI). Similar processes will be employed for</p>

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											developments within the vicinity of other hazardous installations in the Island, which will include consultations with the appropriate regulators."Recommendation 2: Amend Policy NR5 to read:" In considering development proposals within the following safety zones associated with hazardous installations, as designated on the Proposals Map, the Minister for Planning and Environment will consult those regulators identified in brackets and other relevant stakeholders to determine the appropriateness of the development: 1a. La Collette Fuel Farm (The States of Jersey Fire and Rescue Service); 1b. La Collette LPG Storage Site (Health and Safety Work Inspectorate); 2. Les Ruettes LPG Storage Site, St. John (Health and Safety at Work Inspectorate); 3. Airport Fuel Storage Site (The States of Jersey

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											Fire and Rescue Service); 4. Crabbé Explosive Storage Site, St. Mary (The Home Affairs Department). Developments within the vicinity of the hazardous installations at La Collette will also be the subject of consultations with the La Collette Hazard Review Group. In all cases, the health and safety of the public will be the overriding consideration. Developments that would conflict with the requirements of health and safety will not be permitted.
DP265		Mr Graham Spence	Jersey Gas	Policy NR 5	Safety Zones for Hazardous Installations	Neither	Jersey Gas Company's watersealed gas holder at Tunnell Street be added to the list of potentially hazardous sites.	This site presents quantified risks that should be considered in the same LUP context as the four sites already identified and listed.	Accept suggestion	This makes absolute sense because the gas holder is currently used to hold reserve stock and has recently been the subject of a 'Quantified Risk Assessment', which identified that there are risks of failure.	Recommendation 1: Amend the second sentence of para. 9.40 to read: "...Jersey Airport fuel store; Les Ruettes in St. John (where LPG is stored); and the gas holder at Tunnel Street (where reserve stock is held)." Recommendation 2: Amend the list of hazardous installations set out in Policy NR5 to include: "5. The Gas Holder, Tunnel Street (The Health and Safety at Work



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											Inspectorate).
DP367		Mr Paul Garlick		Policy NR 5	Safety Zones for Hazardous Installations	Neither	Jersey Gas is only informing, checking the information. Jersey Gas question if the gas holder at the Jersey Gas Tunnell Street site should be included as a hazardous installation.	Jersey Gas considers that the inclusion of the holder may be necessary in the light of a recently conducted quantified risk assessment. It is recognised that the States of Jersey Health and Safety Inspectorate did not have the quantified risk assessment until after the drafting of the Island Plan.	Accept suggestion	This makes absolute sense because the gas holder is currently used to hold reserve stock and has recently been the subject of a 'Quantified Risk Assessment', which identified that there are risks of failure.	Recommendation 1: Amend the second sentence of para. 9.40 to read: "...Jersey Airport fuel store; Les Ruettes in St. John (where LPG is stored); and the gas holder at Tunnel Street (where reserve stock is held)." Recommendation 2: Amend the list of hazardous installations set out in Policy NR5 to include: "5. The Gas Holder, Tunnel Street (The Health and Safety at Work Inspectorate).
DP965		Mr John Nicholson		Policy NR 5	Safety Zones for Hazardous Installations	Neither	On Friday I stood in for Peter Thorne at a meeting to discuss the Tunnel Street Gas Holder, also attended by Colin Myers (Director of Health & Safety), Graham Spence (Jersey Gas, Michael Maguire (Fire Service) and Michael Long (Emergency Planning). Jersey Gas have commissioned a Quantified Risk Assessment for the low pressure water sealed gas holder (dating from the 1920's, and holding reserve stock), which identifies that there are risks of failure, and potential for off-site issues, which are considered to be 'tolerable' against the usual HSE framework. However, as yet, no land-use risk matrix has been developed (as has occurred at La Collette) - Graham Spence agreed to see if their consultants could add this to the current Assessment. Obviously this is still a 'work-in-progress' but I thought it worth flagging-up both in relation to the Island Plan Review, and the North Town Masterplan, where housing is indicated at the perimeter of the prospective town park, adjacent to the Jersey Gas land		Noted	This makes absolute sense because the gas holder is currently used to hold reserve stock and has recently been the subject of a 'Quantified Risk Assessment', Recommendation 1: Amend the second sentence of para. 9.40 to read: "...Jersey Airport fuel store; Les Ruettes in St. John (where LPG is stored); and the gas holder at Tunnel Street (where reserve stock is held)." Recommendation 2: Amend the list of hazardous installations set out in Policy NR5 to include: "5. The Gas Holder, Tunnel Street (The Health and Safety at Work Inspectorate).	The Minister is minded to amend the plan

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							holding. Colin Myers also identified that the Jersey Gas Assessment should be independently reviewed, and appeared to be aware of the medium-term intention of Jersey Gas to decommission the gas holder, vacate the site and redevelop it, so releasing funds for the development of a second gas production plant - the location of which is yet to be considered (and given the Health & Safety / Land Use issues with the first production plant at La Collette could be problematic).				
DP238		Mr Kevin Bowler			Mineral Resources	Supporting	These are the comments made on behalf of Granite Products Ltd. We support the Island Plan, and in particular its objectives for minerals planning and the need to contribute to the achievement of sustainable development, these being:- To ensure, so far as practicable, the prudent, efficient and sustainable use of minerals and recycling of suitable materials. To conserve mineral resources through appropriate domestic provision and timing of supply. To safeguard mineral resources as far as possible. To prevent or minimise production of mineral waste. To secure working practices which prevent or reduce as far as possible, impacts on the environment and human health arising from the extraction, processing, management or transportation of minerals. To protect internationally and nationally designated areas of landscape value and nature conservation importance from minerals development. To secure adequate and steady supply of minerals needed by society and the economy within the limits set by the environment. To maximise the benefits and minimise the impacts of minerals operations over their full life cycle. To protect and seek to enhance the overall quality of the environment once extraction has ceased, through high standards of restoration, and to safeguard the long-term potential of land for a wide range of after-uses. To encourage the use of high quality materials for the purposes for which they are most suitable. Aim to secure mineral supply indigenously, to avoid exporting potential environmental damage, whilst recognising the primary role that market conditions play. To that end we would seek the maximisation of local resources and in particular not to impose arbitrary time weighted restrictions on extraction if local reserves are available. In particular we would propose that all workable sand reserves at Simons Sands are worked and not limited to 2018. Consider	See attached letter	Support for the Island Plan and its objectives for minerals planning is noted.	The letter does highlight the sustainability aim of securing mineral supply indigenously and proposes that all workable sand reserves at Simons Sand Ltd's site are worked and not limited by an "arbitrary time" restriction. This matter is addressed in the response to DP617.	Noted by the Minister

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							the benefits, in terms of reduced environmental disturbance and more efficient use of mineral resources, including full recovery of minerals, of extensions to existing mineral workings rather than new site. Take account of the benefit, including the reduction in carbon emissions, which local supplies of minerals would make in reducing the impact of transporting them over long distances by road. Recognise the important role that quarries can play in providing historically authentic building materials in the conservation and repair of historic and cultural buildings and structures. Enable the minerals industry, so far as is practicable, to secure productivity growth and high and stable levels of employment. Take account of the opportunities for enhancing the overall quality of the environment and the wider benefits that sites may offer, including nature and geological conservation and increased public accessibility, which may be achieved by sensitive design and appropriate and timely restoration. Consider the opportunities that sites may offer for providing networks of habitats. In order to avoid the possibility of mineral working resulting in dereliction, ensure land is reclaimed at the earliest opportunity and that high quality restoration and aftercare of mineral sites takes place through the provision of guidance on suitable or preferred after-uses and reclamation standards, and the use of conditions and legal agreements, as appropriate. See attached letter				
DP1012		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..."
DP204		Mr Stephen de Gruchy		Objective NR 2	Minerals Objectives	Supporting			Support Noted	Noted	Support is noted by the Minister
DP480		Mr Charles Alluto	The National Trust for Jersey		Supply of Aggregates	Supporting	The Trust welcomes the confirmation that extraction at Simon Sand will not be extended beyond 2018 given the ecological significance of the duneland system.		Support Noted		Support is noted by the Minister

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DP967		Jason Simon	Simon Sand & Gravel		Supply of Aggregates	Objecting	Objective The purpose of this response is to submit my views on the ability of the Island to provide itself with a locally available supply of sand for the next 18-20 years, possibly even longer, challenge the opinions put forward by the P & E committees (P&E) in the Draft Island Plan and its current thinking regarding the Islands future supply of sand and present some potential future after use options for the quarry site for general debate and consideration.	Introduction I commenced working for Simon Sand & Gravel Limited (SS&G) in 1989 and worked in all aspects of the business, both manual and administrative roles, rising to the position of Manager. In 1994 I supervised the change from a sole trader business to a registered company. Between 1995 & 2004 I held the position of Managing Director and for the past 5 years I have been the owner of SS&G. I believe that my experience gained during the last 20 years gives me the necessary credentials to be able to comment on this issue with some authority. As a key stakeholder in mineral extraction I have been involved with the many draft Island Plan Stakeholder Meetings which commenced back in November 2007. You may ask why I have left it till such a late stage in the consultation process to challenge its legitimacy and I answer simply that I wished to allow the process to take its course. But after two years of discussion my judgement in the belief that the process would be heading towards a satisfactory common sense conclusion was, I now feel, incorrect and it is imperative that I make my opinions known. One of my biggest concerns regarding the P&E current thinking on sand supplies for the Island is the departments, planners and officers continued reliance on the outdated report produced in the mid to late 90's by Arup which formed the basis for their intended proposition to take to the States called the Jersey Mineral Strategy 2000 - 2020 (JMS). A proposition that was not put forward for debate and therefore was never approved although it was used to guide policy making for the 2002 Island Plan. In the 10 years since the JMS was produced a lot of things have changed politically, economically, ecologically and I intend to highlight these points in my response. Local Resource SS&G quarry two types of sand and shale stone from privately owned land in St Ouens Bay that was zoned for extraction in 1976. The current permit was granted in 2003 for a 15 year period. The products, supplied solely for the Island, are all primary aggregates and no other operations (recycling, landfill etc.) currently take place on the site. Sand is an important commodity to the local construction industry and there are reserves, in addition to those currently permitted for extraction, which would be beneficial to the Island to extract. Whilst importation will eventually become necessary maximising extraction of the local sand resource will assist with keeping building costs down, has less of an impact	Reject - No change to plan	This response addresses each broad area of contention in the order they are raised. 1. Extending the Life of the Quarry The draft Plan recognises: - there have been changes since the Jersey Mineral Strategy was produced; - the importance of sand to the local construction industry; - there are 10-12 years worth of reserves of sand in addition to those currently permitted for extraction. There is also sympathy for the owner/operator who wishes to extend the life of a quarry, which has been a family business in the Bay for 100 years or so. To do so would extend / maximise the life of an important locally available resource and so have wider sustainability advantages. However, the overriding concern is that it would increase the adverse impact on the sensitive coastal dune land environment, a significant area of which has been replaced with a large body of open water. It would also serve to overturn a longstanding commitment to wind down the quarry and would simply delay, for a relatively short period, the inevitable requirement for importation. (see also the response to DP617). 2. Allowing for recycling operations (sand & soil) on site It is agreed that this would help to reduce demands for quarry sand. The draft Plan encourages recycling and Policy WM4 allows for any proposals for recycling to be considered on their merits. 3. Suitability of the product Although the Arup study and original Mineral Strategy highlight the limitations of the product for certain uses, this is not regarded as a primary reason for justifying the winding down of the quarry. 4. Alternatives to the use of sand The comments about the impact of less sand-intensive	The Minister is not minded to amend the draft Plan

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								<p>environmentally because of its proximity to the end users and most importantly the government maintain some control over the operation.</p> <p>Reserve It is anticipated that the sand reserves within the site boundary and approved for extraction will meet local supplies, at the current demand rate, until the expiry of the latest permit. Due to the fluctuations in the various sand deposit layers it is difficult to give an accurate figure on this reserve but an educated estimate from the area left to be extracted would be in the region of 630,000 - 700,000 tonnes. Another reserve, owned by the company, that falls within the area zoned in 1976, but is presently being used for environmental mitigation, does not form part of the extraction area for the current permit. An early indication towards maximising the extraction of the local sand resource would allow SS&amp;G time to alter its current restoration programme thus preventing the loss of a reserve which is being buried under more soil. The yield from this reserve is estimated at 250,000 to 300,000 tonnes or between 4-5 years supply. There are also potential reserves under several smaller fields, which fall within the zoned area for extraction, immediately adjacent to the current site. Some of the fields are not in the ownership of SS&amp;G. These smaller reserves could yield a further 3-5 years of sand at the current annual rate of extraction.</p> <p>Maximisation Of Local Resource If the option to maximise extraction of local sand reserves was adopted it would potentially result in the Island being able to supply sand for itself for the next 18-20 years. This exceeds the 2018 closure date, suggested by the consultants Arup, in the JMS report of 1999, by a further 8-10 years. Inevitably, the importation of sand and other aggregates into the Island will occur with the consequence that a berthing facility will need to be built somewhere on the Island and it looks likely that this might be operational before 2018. Adopting this scenario would see imported and locally available sand competing in the market place as well as giving the customer the ability to be able to choose the sand most suitable for their purpose. Another option, that would extend the life of the locally available resource, is the adopting of operation specific recycling at the Islands quarries. This idea would see that sand and soil excavated around the Island was brought to the sand quarry site for recycling meaning that, for certain applications, the recycled material could be mixed with the primary aggregate. As well as extending the life of sand</p>		<p>construction methods (i.e. timber frame and steel frame buildings) and increased recycling in contributing to the conservation of local sand resources over recent years are noted and understood. 5. Ecological Issues It is accepted that the findings of the EIA, produced in conjunction with Simon's 2003 planning application provide detailed information on a wide range of environmental issues. The application was effectively in accordance with the original Mineral Strategy and the permit provided the company with sufficient time and comfort to confidently invest in modernising its plant and machinery, on the understanding that it would cease operating in 15 years. The EIA was a requirement to allow a proper assessment of the environmental effects and served to ensure significant impacts were avoided or mitigated. What did id say? There is no doubting the quality of restoration and environmental management carried out by the company around the lagoon that has been created by quarrying. 6. After Use The draft Plan encourages the development of appropriate 'restoration and after use' schemes in association with mineral extraction sites and provides for applications to be considered on their merits (Policy NR9). It also supports the idea of terrestrial landfill, where this might contribute to the restoration of suitable existing mineral workings (Policy WM8). Whilst La Gigoulande is the preferred / designated option, the draft Plan recognises that Simon Sand and Gravel may wish to bring forward proposals, which might provide opportunities to restore dune habitats in the area (para 10.98, p.435).</p>	



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								reserves this has the additional benefit of recycling sand and soil that might otherwise end up at the La Collette landfill site. The fact that Granite Products Limited has been granted an extension to their quarry site, which contradicts the JMS stated Preferred Mineral Strategy, by allowing them to extract beyond 2020, must be seen as a positive move by P&E towards maximising locally sourced materials. As such SS&G should be given the same opportunity to be able to amend its future plans to allow for the maximisation of its resource. This option has benefits socially, economically and environmentally which can not be ignored in favour of early importation. Is it not hypocritical of us as a community to say "I don't want sand quarrying in my Island but please can you supply me some of your resources?" from who or where ever we decide to source it from. It will be an entirely different matter when we do not have a resource available to us locally. Suitability One of the disadvantages of maximising local supply according to the JMS report states "retaining sand with a limited range of applications" and over the years much has been said regarding the suitability of the sand quarried from St Ouens Bay. Most of it misleading and inaccurate comments and articles from politicians, civil servants and consultants who did not have the correct facts or had not bothered to investigate the matter fully or even contact the business directly for information. I continue to strongly dispute this point as SS&G quarry supply several different products with a good range of applications. These include sand for concrete and blocklaying, sand for plastering, rendering and pointing, black sand for backfill of trenches and foundations and shale stone for pipe bedding, garden landscaping, drives and pathways. All our products meet the current British Standards and European Number specifications for their particular areas and uses. Another comment often heard is the fact that granite dust has to be added to our sand when it is used to make large volumes of concrete. I respond to this point and say that although the sand supplied for concrete is a fine wind-blown deposit (of which 94% is less than 1.18mm in size) it must be understood that this is a naturally occurring resource which we only process to ensure that it contains particles no larger than 4mm. Granite dust is added to the concrete products manufactured by Granite Products Limited and Ronez Limited but this is not a unique practise specific to Jersey. Stone quarries the world over produce a lot of fine stony dust as a			

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								<p>by-product during the processing of stone and one way to move this product on is to add it into the manufacturing of concrete and blocks. It should be noted that approximately a third of our annual output is supplied to these two companies who use it in the manufacturing of their concrete products. To date, I am unaware of any specific limitations on the products we supply and since SS&amp;G has been supplying the Islands construction industry, for the last 100 years, I have yet to hear of any structurally defective building issues that arose directly as a consequence of our sand being used in there construction. Sustainable Alternatives Sand or Silicon Dioxide (SiO<sub>2</sub>) is composed of Silicon and Oxygen. On Earth, silicon is the second most abundant element, after oxygen, making up over a quarter of the Earths crust by mass. Because of this global availability it is unlikely that nothing will replace sand on its economy and will always make it the first choice. In places where it is not readily available the next alternative is a product called broken sand (stone broken down into fine sand). This method requires stone to be heavily processed although it is something not currently undertaken in Jersey. If this option was given some consideration it would seem imprudent to do so as the Island has finite stone resources and stone turned to sand would deplete the reserves quicker, use a lot of energy to produce and eventually lead to the need for stone to be imported earlier than necessary. Ultimately, this alternative would seem fool hardy when we have sand reserves on the Island available to quarry. In other specialist concrete jobs, sand can be replaced with alternative materials to increase the properties of the final product, such as pearolith (to produce light weight concrete) or magma ash (to produce heat resistant concrete), but these are more expensive. As it is very unlikely that a replacement for sand will be found soon the only plausible option to look at, as an alternative, is the use of other materials in the construction and building industry. This is already being practised in Jersey and is done in various ways but the two biggest alternatives are timber frame housing and steel frame with glass town/office buildings. Both these methods require considerably less sand in there construction. As well as having good environmental and sustainable credentials they reduce our reliance on sand with the result that the Islands reserves are protected and extend the quarries operational life. The following table shows the figures for the last 10 years output from</p>			

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								<p>SS&amp;G quarry. The figures shown are in 5 year blocks and include the annual average for each period. The forecast tonnage for 2009 is likely to be between 64-66,000 tonnes. Tonnage Statistics - 2000 to 2009 Year Tonnage Year Tonnage 2000 63,252 2005 74,468 2001 89,325 2006 78,494 2002 83,274 2007 64,751 2003 73,436 2008 66,905 2004 70,886 2009 66,000 (forecast) 5 Year Average 76,034 70,123 The effect of these alternative materials, along with other influences such as adding granite dust to concrete products and more recycling, can be identified. Using the average figures from the last 5 years a reduction in supply of almost 8% can be seen when compared with the first half of the decade. This may not sound significant but this reduction equates to approximately 29,555 tonnes over that period and demonstrates clearly that, although this method is not a direct alternative for sand, using alternative building materials and other practises positively increases the longevity of the Islands sand reserves. Turning once again to the JMS and in particular a sustainable framework for mineral extraction the following suggestions are made. To conserve minerals as far as possible, while ensuring an adequate supply to meet needs of the local community. To minimise production of waste and encourage efficient uses of materials, including appropriate use of high quality materials and recycling of wastes. The current alternative materials and methods, mentioned earlier, are already contributing to the conservation of the local supplies of minerals. Almost all the sand extracted from SS&amp;G quarry is used to meet local demand with less than 1% which has no commercial value, being used for landscaping of the site, which is evidence for the highly efficient working of this sand reserve. Ecological Issues There are a lot of comments made in the JMS referring to the potential impacts the continued extraction of sand might have on the immediate environment. All the observations made on environmental and socio-economic issues raised were not substantiated in the report by any further study and therefore can only be seen as conjecture. Whilst applying for our latest permit SS&amp;G was charged by P&amp;E with supplying an Environmental Impact Assessment (EIA) to add weight to the planning application. In June 2003 our EIA was presented along with the application for consideration which led to the approval and permit being granted at the end of Aug 2003. The EIA contained extensive study and research into</p>			

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								<p>many topics including, hydrology and hydrogeology, flora and fauna, landscape, archaeology, geology, noise, vibration and dust, traffic and access. Also put forward in the document were mitigation measures which are still in place today and involve the annual monitoring of flora and fauna, invertebrates and green lizards. Because the EIA and subsequent annual monitoring reports were produced at least three years after the completion of the JMS the factual evidence they contain has not been taken into consideration when deliberating this Island Plan Review. Evidence which I feel would positively support the adoption of maximising the Islands supply of locally available sand as well as disproving many of the unfounded ecological points raised in the JMS. One point raised in the JMS was the loss of land that continued extraction would have on all quarry sites. However, with the removal of sand from below the water table at the SS&amp;G site a large reserve of fresh water has been created. Jersey Water actively abstract water from boreholes on the Sand Dunes and this unofficial reservoir greatly increases the quantity of water held back for Island wide consumption which would otherwise have found its way to the sea. Although this change of use from land loss to water reservoir can be seen to be detrimental one of the facts compiled from the annual monitoring is that the continuing restoration and management of dunescapes around the quarry site hold more plant and wildlife, especially green lizards, when compared to areas of the quarry that have yet to be extracted. The JMS when discussing a sustainable framework for mineral extraction make the following suggestion. To encourage sensitive working practises during extraction and to preserve or enhance the overall quality of the environment once extraction is completed. Throughout its long history SS&amp;G has always been aware of its duty of care to the environment and it is something that I am justly proud of. Although we have always had self believe in our working practises and environmental management skills until the annual monitoring reports were put into place we had no data to prove there effectiveness. After several years of reporting and monitoring this data is now available and substantiates our past efforts. Quarrying with Conservation has been the motto of SS&amp;G for some years now and extraction of sand from the site has always been done whilst being mindful of the immediate environment and its inhabitants and as such it will</p>			

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								<p>continue to receive the due consideration it merits. Potential After Use The potential for after uses are many however, the final solution for the area must take into consideration the Islands community needs as well as the immediate environmental concerns. I have listed below what I consider to be options that warrant more discussion. One option is to consider the quarry as an alternative to a berth at the harbour. This could be done by using an offshore berth positioned in St Ouens Bay with an underground pipe line directly into the quarry site allowing imported sand to be delivered by ship straight into the quarry site. When the berth was not in use it can be made to be submersed below the sea water so as not to detract from the view. This would have the benefits of not requiring handling at the harbour thus avoiding the costly port dues as well as reducing heavy lorry traffic collecting sand from the harbour/town areas. Another consideration is the maintenance of the site as a large body of fresh water for Island wide consumption. Adopting this after use would benefit from implementing the maximising of local resources option as the more sand extracted the more fresh water can be retained. This unofficial reservoir will have obvious benefits for the Island not least the fact that it will not cost the public anything to create. One negative point that has already been highlighted as a concern, by Jersey Airport, is the close proximity of such a large body of water to the end of the runway. The option to reinstate the site, using inert landfill, must also be given due consideration. Again, it would not cost the public money to set up unlike another reclamation site or other possible alternatives. It also has the added benefit of longevity as it will take a considerable amount of time to reinstate the site. I conservatively estimate that we would have a void volume available of approximately 4 million tonnes, if the maximising of the supply of local resources option was taken, which is an area roughly equal to the current La Collette landfill site and would provide the Island with an inert landfill for a period of 10+ years. SS&amp;G has proven over the years that with careful management of the site it has been able to excavate a valuable resource with minimal impact and in enhance the habitat for wildlife. If the after use to reinstate the land, using inert landfill, was given approval then I am confident that I can manage the reinstatement in such a way that it will be of greater benefit to the immediate environment and its inhabitants.</p>			



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								<p>However, I am mindful that after the decision was taken by SS&amp;G to progressively restore the site rather than waiting until extraction was completed has meant that we have unwittingly created a wildlife reserve making the decision to reinstate the site a difficult one. Tourism may also be a plausible after use for the site. This could take the form of some kind of outward bound centre offering recreational activities such as rambling, orienteering, mountain bikes, etc. As there will also be a large lake created, once extraction is completed, the opportunity to offer sailing, canoeing, windsurfing, etc. training in a safe environment before heading out on to the seas will exist. As fresh fishing is a very popular recreational activity filling the reservoir with fish would be a credible option to consider. There is also the idea of offering small buildings for holiday makers, similar to the eco-friendly apartments that have been built at Les Ormes, and a campsite with space for visiting caravans and motor homes making it an ideal place for visitors to explore St Ouens Bay and the Island. One or all of these holiday/tourist based ideas could easily be accommodated on the site and as long as the activities were not of a disruptive or intrusive nature the after use option for eco-tourism must be seen as a realistic option. Conclusion All of my views could be seen to be orientated or weighted in favour of business activities as I am a businessman however, do not discount them because of this fact. Having lived and worked this particular area of St Ouens Bay all my life I have attempted to keep my comments as impartial as possible looking at the Islands needs rather than my own. No-one wants to see it managed correctly and ultimately made available for future generations to enjoy more than I do. Finally, I strongly believe that it is not the function of P&amp;E to determine that all sand must be imported. Should it not be upon the States to create a business environment where there is competition between my company and any importer of sand rather than imposing a requirement on my business to close down altogether? Given that the land has been used for the extraction of sand for the last 100 years (with permits being issued since 1965) P&amp;E need to have a very good reason for saying why such a long established and approved use should be discontinued.</p>			
DP205		Mr Stephen de		Policy NR 6	Supply of Aggregates	Supporting			Support Noted	Noted	Support is noted by the Minister

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		Gruchy									
DP479		Mr Charles Alluto	The National Trust for Jersey	Policy NR 6	Supply of Aggregates	Objecting	Whilst appreciating the benefit of having a sustainable, local supply of crushed rock aggregate the Trust believes that the Minister should ensure that the stated policy also acknowledges the need to safeguard and protect the coastal environment around Sorel Point in terms of landscape, ecology and geology. It is noted that this is referred to in Policy NR8 in relation to extended workings.	However, the revised mineral strategy must ensure that an appropriate balance is struck between securing supply of aggregate and the further destruction of a sensitive coastal site.	Reject / Disagree	The primary purpose of this policy is to ensure a steady supply of aggregates, because this is essential to the Island's future prosperity and quality of life. The policy is balanced in that it recognises the need to minimise adverse environmental effects by adopting a sustainable (environmentally favourable) approach. This also accords with UK Government Guidance on minerals planning. The requirement for a 10 year 'land bank' of permitted reserves for crushed rock, will effectively act as an indicator of when new permissions for aggregate extraction are needed. Any applications will have to be assessed against Policy NR8 (New or Extended Mineral Workings) which makes adequate provision for ensuring that the environmental impacts of such proposals are properly considered. This will provide the means for protecting the coastline around Sorel Point from unacceptable environmental impacts associated with future proposals to extend Ronez Quarry. Other relevant policies which look to protect the character of the coast and biodiversity include GD1 (General Development Considerations), NE6 (Coastal National Park), NE7 (Green Zone), NE1 (Conservation and Enhancement of Biological Diversity), NE2 (Species Protection). Recommend - Add "areas of ecological importance" to the criteria listed in 2a of Policy GD1.	Noted by the Minister
DP837		Mrs Susan Kerley		Policy NR 6	Supply of Aggregates	Supporting	I endorse the suggestions and comments made by the National Trust for Jersey on these policies and proposals		Noted		Support is noted by the Minister
DP206		Mr Stephen de Gruchy		Policy NR 7	Secondary and Recycled Materials	Supporting			Support Noted	Noted	Support is noted by the Minister

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					/ Alternativ e Aggregate s Productio n						
DP207		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)
DP438		John Le Maistre	Jersey Farmers Union	Policy NR 8	New or Extended Mineral Workings	Supporting	The protection of good agricultural land is regarded as positive.		Support Noted	Comment - The protection of good agricultural land is actually referred to in the supporting text for the policy (para. 9.84). Policy ERE 1 is the main policy requiring the safeguarding of agricultural land. See also Policy NE7 (Green Zone) and Policy GD 1 (General	Support is noted by the Minister

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										Development Considerations).	
DP208		Mr Stephen de Gruchy		Policy NR 9	Restoration, Aftercare and After Use	Supporting			Support Noted	Noted	Support is noted by the Minister
DP481		Mr Charles Alluto	The National Trust for Jersey	Policy NR 9	Restoration, Aftercare and After Use	Supporting	The Trust fully endorses and very much welcomes this policy.		Support Noted		Support is noted by the Minister
DP838		Mrs Susan Kerley		Policy NR 9	Restoration, Aftercare and After Use	Supporting	I endorse the suggestions and comments made by the National Trust for Jersey on these policies and proposals		Noted		Support is noted by the Minister
DP209		Mr Stephen de Gruchy		Policy NR 10	Use Of Planning Conditions On Mineral Workings	Supporting			Support Noted	Noted	Support is noted by the Minister
DP224		Mr Stephen de Gruchy		Policy NR 11	Use of Legal Agreements	Supporting			Support Noted	Noted	Support is noted by the Minister
DP1013		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.	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,

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											<p>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. Helier Harbour and will seek to ensure, in consultation with</p>



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											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. Detailed proposals for the facilities..."Recommendation 3: That the symbol for the 'Aggregates Import Facility' is removed from the Draft Island Plan Proposals Map and Town Proposals Map.
DP210		Mr Stephen de Gruchy		Policy NR 12	New Off-loading Facilities for Imported Aggregates	Supporting			Support Noted	Noted	Support is noted by the Minister
DP1165		Richard Plaster	Jersey Electricity plc	Policy NR 13	Utilities Infrastructure Facilities	Objecting	In terms of our own long term capital spend, the main development which we foresee impacting the Island Plan is the need for a site for a compact, fast start generating plant similar to our current gas turbine generators. For strategic and emergency supply reasons, it is important that this be sited remotely from the present two generating sites at La Collette and Queens Road. Our clear preference is for a site to be identified at the airport where we have the potential of utilising the current aero fuel supply and our new 90kV Western Primary substation.		Noted	Policy NR13 allows for the development of new infrastructure facilities within the grounds of existing facilities and within the Built-up Area. Jersey Airport is not within the BUA and the extent of land required, relative to the existing facility is not known. Despite much work with the JEC in relation to the development of the Energy Policy White Paper and the context of the resilience of Jersey's energy supply, this matter has not previously been raised. There is a need to establish the basis of the requirement and the anticipated timescale for provision. The strategic preference for a location at Jersey Airport can be considered within the context of the Jersey Airport Regeneration Zone (Proposal 12).	The Minister is not minded to amend the draft Plan
DP211		Mr Stephen		Policy NR 13	Utilities Infrastructure	Supporting			Support Noted	Noted	Support is noted by the Minister

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		de Gruchy			ure Facilities						
DP212		Mr Stephen de Gruchy		Policy NR 14	Telecomm unications Masts	Supporting			Support Noted	Noted	Support is noted by the Minister
DP213		Mr Stephen de Gruchy		Policy NR 15	Satellite TV Receiving or Communic ation Antennae	Supporting	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 encouragi ng the use of communa l satellite dishes, where appropria te	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
Waste											
DP959		Mr Roger Corfield		10	Waste Managem ent	Neither	Please note that the following changes need to be made to Chapter 10 of the Draft IP - Waste Management: Page 402 Should sub-title read "WM: Introduction)? Page 402, Para. 10.4, second line Should read "principle". Page 402, WM: Introduction This should surely include some words of introduction to solid waste management? I suggest the following: 10.6 Dealing effectively and responsibly with solid waste remains a big challenge for the Island. Waste is an unwanted by-product of the development process and represents a "misuse of resources". It needs to be reduced and managed safely and effectively to achieve environmental and economic benefits and help in achieving sustainable development. 10.7 The main overriding aims of this section of the plan are: · to deliver the States Strategic Plan and the Solid Waste Strategy to secure an acceptable balance between the community's need to manage waste, whilst protecting the local environment and the amenities and health of local residents; · to give greater certainty as to the location and scale of future waste management facilities and to provide a clear guide to waste operators, other public bodies, interest groups and the public where waste facilities are likely in principle to be acceptable; · to ensure		Amendm ents put forward by planning officer	Recommendation 1: The subtitle above para. 10.1, page 402 should read: "WM: Introduction". Recommendation 2: All the sub-titles and policies in the 'solid waste' section should be pre-fixed with "SWM". Recommendation 3: Page 402, para. 10.4, second line should read "principle". Recommendation 4: The following text should be included below the sub-title "WM: Introduction" on page 402: "10.6 Dealing effectively and responsibly with solid waste remains a big challenge for the Island. Waste is an unwanted by-product of the development process and represents a "misuse of resources". It needs to be reduced and managed safely and effectively to achieve environmental and economic benefits and help in achieving sustainable development. 10.7	Minister minded to support changes to Plan

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							<p>that any proposals for waste management operations are environmentally acceptable and, where appropriate, are accompanied by satisfactory proposals for restoration and after-use. Page 403, Para. 10.7 This is not a paragraph, but simply a source reference. Page 406, Para 10.11 Omit fourth bullet point relating to re-use and recycling centres. Page 415, Para. 10.36, second line Should read "... facilities needed..." Page 416, first bullet point Omit one full stop Page 418, Para 10.42, end of last line Omit "licence." Page 419, Policy WM2, first no.2 Omit "2. Existing quarries, as appropriate". Page 420, Policy WM2, No.5 Should read "...bio-diversity and...". Page 426, Policy WM5, No.4 Omit "4." and shift the two lines starting "subject to the provision..." over to the left. Page 438, Para 10.102, second line Should read "...at least 200 years. However, since..." Page 438, Para 10.103, end of second line Should read "available". Page 446, Para 10.121, Water Pollution (Jersey) Law 2000, second bullet point Should read "establish and issue discharge permits and ensure that no condition of a ...". This is an amendment suggested by Jody Robert and Steve Fisher. Page 446, Para 10.121, Drainage (Jersey) Law 2005 Omit first bullet point and replace with "Establish and issue Trade Effluent Consents to foul sewer". Again this has been requested by Jody Robert and Steve Fisher. Page 447, Para 10.125, fifth line Should read "environment and aimed to promote..." Page 451, Policy LWM1, second para Should read "...part of a 'Site Waste Management Plan' ". Page 452, Para 10.139, fourth line Should read "...sewage effluent. However, proposals...". Page 456, para 10.146, final bullet point Should read "...surface water sewer." Requested amendment from Steve Fisher. Page 456, para 10.146, penultimate bullet point Should read "...release to a public surface water sewer; and" Page 457, Policy LWM3, sixth bullet point Should read "...release to a public surface water sewer" Agreed as amendment with Steve Fisher - 4th December. Page 457, Policy LWM3, fourth para This should be split into three paras. The second sentence beginning "Applicants will be expected.." should be a separate para The final two sentences beginning with "Discharge rates..." and ending with "...run-off" should be a separate para Page 457, Policy LWM3, final para Sewage Treatment Facility should not be in brackets. Page 460, Policy LWM4 The second sentence beginning "Proposals for a new /..." is not a bullet point and should be shifted to the left. Steve has also asked whether it is the intention that all tanker discharge points, pumping</p>			<p>The main overriding aims of this section of the plan are: o to deliver the States Strategic Plan and the Solid Waste Strategy; o to secure an acceptable balance between the community's need to manage waste, and requirements to protect the local environment and the amenities and health of local residents; o to give greater certainty as to the location and scale of future waste management facilities; o to provide a clear guide to waste operators, other public bodies, interest groups and the public as to where waste facilities are likely in principle to be acceptable; and o to ensure that any proposals for waste management operations are environmentally acceptable and, where appropriate, are accompanied by satisfactory proposals for restoration and after-use." Recommendation 5: Omit para. number 10.7 from Page 403. This is simply a source reference. Recommendation 6: On Page 406, Para 10.11 omit fourth bullet point relating to re-use and recycling centres. Recommendation 7: On Page 407, omit para. numbers 10.15 to 10.17, which should simply be bullet points under para. 10.14. Recommendation 8: On Page 410, reword point 1 to read: "1. new composting and recycling facilities". Recommendation 9: Reword the beginning of para. 10.36 on Page 415 to read "Within the Plan Period, the following new and improved strategically important waste management facilities will be required:..." Recommendation 10: On Page 416, first bullet point, omit one of the full stops. Recommendation 11: On Page 418, para 10.42, end of last line, omit "licence." Recommendation 12: On Page 419, Policy WM2, first no.2, omit the words "2.</p>	

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							stations with odour control units and impounding ponds will be shown on the Proposals Map as noted in Policy LWM2, page 454. These need to be identified Ralph.			existing quarries, as appropriate" and change the para. numbering that follows. Recommendation 13: Page 420, Policy WM2, No.5 Should read "will not have an adverse effect on bio-diversity and...". Recommendation 14: On Page 426, Policy WM5, omit the number "4." and shift the two lines starting "subject to the provision..." over to the left. Recommendation 15: On Page 426, amend the second para. of Policy WM5 to read: "In order to enable and encourage recycling and sustainable waste management, the Minister will seek to ensure that appropriate storage facilities are provided for waste and recyclables in all new developments, which are: o of adequate capacity; o safe and accessible..." Recommendation 16: On Page 433, para. 10.91, fourth sentence, replace the words in the brackets with the following: "... (described in the Natural Resources and Utilities Chapter),...". Recommendation 17: On Page 438, para 10.102, the second line should read "...at least 200 years. However, since..." Recommendation 18: On Page 438, para 10.103, the end of second line should read "available". Recommendation 19: On Page 446, para 10.121, Water Pollution (Jersey) Law 2000, the second bullet point should read "Establish and issue discharge permits and ensure that no condition of a discharge permit is contravened". Recommendation 20: On Page 446, para 10.121, Drainage (Jersey) Law 2005, the first bullet point should be omitted and replaced with "Establish and issue Trade Effluent Consents to foul sewer". Recommendation 21: On Page 447, para 10.125, the fifth line should read "environment and aimed to promote..."	

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										Recommendation 22: On Page 451, Policy LWM1, the second para should be amended to read "...part of a 'Site Waste Management Plan' ". Recommendation 23: On Page 452, para 10.139, the fourth line should read "...sewage effluent. However, proposals...". Recommendation 24: On Page 455, para. 10.146, the first bullet point should read: "...for later use (see Proposal 20: Water Conservation);" Recommendation 25: On Page 456, para 10.146, the penultimate bullet point should read: "...gradual release to a public surface water sewer; and" Recommendation 26: On Page 456, para 10.146, the final bullet point should read "...surface water sewer." Recommendation 27: On Page 457, Policy LWM3, the sixth bullet point should read "...release to a public surface water sewer" Recommendation 28: On Page 457, Policy LWM3, final para, the words "Sewage Treatment Facility" should not be in brackets. Recommendation 29: On Page 460, Policy LWM4, the second sentence beginning "Proposals for a new /..." is not a bullet point and should be shifted to the left.	
DP30		Mr Terence Tanner			W: Introduction	Objecting	My thoughts on this has been made in the environment section	Solid waste is the only contention apart from the smell from Bellozanne perhaps better charcoal filters changed more frequently.	Reject	See DP18 and DP19. Mr Tanner is objecting to the location of the new replacement Energy from Waste Plant at La Collette, because it will damage the adjacent Ramsar site. He argues that future breakdowns and maintenance problems (esp. as the plant gets older) and demolition at the end of its life will give rise to "exposure to possible substantial toxic material, which is liable to pollute the surrounding area". The development of the replacement plant has already been approved by the States, has been granted planning consent and is under	The Minister notes the comments made but is not minded to amend the draft Plan



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										construction. It must be taken as a given for the purposes of the draft Island Plan. The odour from Bellozanne Sewage Works can on occasions extend over a large residential area to the south (First Tower) and this is a management issue for TTS. It is being addressed as part of the on-going Liquid Waste Strategy development. One would expect this to be addressed by some form of enclosed odour control plant for the sludge storage tanks and the inlet works, if the Sewage Works remains in the same location.	
DP214		Mr Stephen de Gruchy		Objective WM 1	Waste Management	Supporting			Support Noted		Support is noted by the Minister
DP215		Mr Stephen de Gruchy		Proposal 21	Waste Minimisation and New Development	Supporting	Does the policy need to include a definition of "major new development" (i.e. as stated in paragraph 10.26)?		Accepted	To make clear what is intended by Policy WM1.	Amend 2nd para. to read... "All new developments of 10 or more dwellings, or above a threshold of 1,000m <sup>2</sup> and/or developments which would involve the demolition of major structures if the potential generation of significant quantities of waste material will only be permitted where:...".
DP1066		Ray Shead	The Jersey Chamber of Commerce	Policy WM 1	Waste Minimisation and New Development	Supporting	This policy is agreed. The existing Planning requirement for Waste Management Plans does not include site waste nor does it include the monitoring of the results of the development at its conclusion. This Policy reinforces and extends the existing policy to include site waste during construction and the recording of the actual results compared with the estimate.		Support Noted		Support is noted by the Minister
DP216		Mr Stephen de Gruchy		Policy WM 1	Waste Minimisation and New	Supporting			Support Noted	Noted	Support is noted by the Minister

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					Development						
DP879		Mr Stephen D Smith	Health Protection Services	Policy WM 1	Waste Minimisation and New Development	Supporting		The service supports the need for re-use and recycling of waste and the use of Site Waste Management plans. However, before this there is a need to consider development schemes to reduce the need for the wholesale excavation of material for further car parking at commercial developments particularly in town.	Support for waste minimisation policy noted.	It is accepted that proposals involving wholesale site excavation to provide underground car parking etc can impact significantly on the amount of residual waste that requires to be disposed of in landfill (e.g. major Waterfront developments such as the Esplanade Quarter and Castle Quays and various other proposed residential, commercial and mixed use developments in the urban area). The creation of waste and the requirements for waste minimisation in any such developments can be assessed against the criteria set out in Policy WM1. However, all such applications will need to be assessed on their individual merits having regard to all the relevant policies in the Plan and there may often be requirements for 'trade-offs' to satisfy overriding policy aims. In the circumstances, it is not considered appropriate to be prescriptive in specifically precluding / presuming against excavations for underground car parking in new developments.	Noted by the Minister
DP217		Mr Stephen de Gruchy		Policy WM 2	New and Expanded Waste Management Facilities	Supporting	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..."
DP878		Mr Stephen D Smith	Health Protection Services	Policy WM 2	New and Expanded Waste Management Facilities	Neither	The use of land based areas such as quarries for landfill with inert waste and for secondary / recycled aggregate has the potential for long term adverse effects on water catchments used for potable sources. If this is to occur it is vital supervision /enforcement is effective thereby ensuring only inert material is deposited to prevent contamination of those water sources.		Comments Noted	It is accepted that uncontrolled landfill can have adverse effects on water catchments and lead to water contamination. For this reason, Policy WM8 (Residual Waste and Terrestrial Landfill Sites) includes requirements aimed at ensuring that	Noted by the Minister

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										environmental impacts are satisfactorily controlled and that the types of waste and methods of disposal meet the requirements of the Minister for Transport and Technical Services. Clearly, where the geology etc proves unacceptable, and there is a potential risk to water sources, any waste disposal that is permitted (having regard to the requisite Environmental Impact Assessment) would be restricted to inert material and have to meet specified mitigation measures, which are likely to include requirements for effective supervision. Any breach of planning consent would be subject to enforcement proceedings and other regulatory controls (e.g. The Waste Management Jersey Law 2005 and the Water Pollution Jersey Law 2000).	
DP218		Mr Stephen de Gruchy		Policy WM 3	Integrated Waste Management	Supporting			Support Noted	Noted	Support is noted by the Minister
DP219		Mr Stephen de Gruchy		Policy WM 4	Recycling / Composting Facilities	Supporting			Support Noted	Noted	Support is noted by the Minister
DP220		Mr Stephen de Gruchy		Policy WM 5	Re-use and Recycling Centres	Supporting			Support Noted	Noted	Support is noted by the Minister
DP221		Mr Stephen de Gruchy		Policy WM 6	Inert Waste Recycling	Supporting			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
DP222		Mr		Policy	Waste to	Supporting			Support	Noted	Support is noted

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		Stephen de Gruchy		WM 7	Energy and Material Recovery Facilities				Noted		by the Minister
DP263		Dr. R.A Kisch		Policy WM 7	Waste to Energy and Material Recovery Facilities	Neither	Waste Management WM7 proposes ultimate residue to be landfilled in preference to land reclamation. The Ramsar designated areas are especially referred to but are not absolute when necessary for the economy. Amendment to be land reclamation rather than landfill. See suggestion below.	Ramsar sites applied to large coastlines ignores the economic and social pressures generated within a small island like Jersey. Reclaimed land is more valuable and availability of landfill sites much more difficult in a small area. Further comment: To cover expanding population plans, incineration has been sized larger than present capacity requires. Two units running together will only be needed at peak periods. further, one "spare" is needed to enable incineration during maintenance and to cover breakdown. Increasing reclaim and recycling will, initially at least, reduce the volume of material for incineration. SUGGESTION: When the new Jersey incinerator is proven working correctly, then for the contract period (renewable) of, say, three or five years, Guernsey material for incineration be accepted. Such a deal would involve shipping of the material to Jersey and should include return of the Guernsey proportion of ash residue in suitable sealed bags for Guernsey disposal. If Guernsey were to accept all ash residue (that is, both Jersey & Guernsey), then the gate fee payable per ton of Guernsey material would be reduced. Guernsey to provide and pay for all shipping, handling and bagging costs.	Noted	Notes: 1. The point raised about preference for landfill over land reclamation addresses Policy WM8. The case for preferring landfill of residual waste when La Collette 2 is no longer available is made, on balance, in the text justifying / explaining Policy WM8. Part of this case rests on the ready availability of a substantial potential landfill site at La Gigoulande Quarry. A void at the western end of the quarry could alone provide for fill over 12 to 15 years 2. The draft Plan recognises the pros and cons of promoting further land reclamation (including the potential value of the land created and the potential environmental problems), and does allow for reclamation where it is proven to be in the Island's "urgent strategic interest" (Policy WM9). 3. The suggestion regarding the acceptance of Guernsey's waste for incineration is a strategic issue that needs to be addressed within the context of the Island's Solid Waste Strategy and the States Strategic Plan, rather than the Island Plan.	Noted by the Minister
DP39		Mr Anthony Paintin	La Societe Jersiaise, Ornithology Section		Residual Waste and Terrestrial Landfill Sites	Objecting	Removal of Simons Gravel Pits from para 10.98 as a possible private landfill site.	Simons Sandpits contain the only Sand Martin breeding colony in the Channel Islands (over 100 pairs in 2009). This species is protected under the current wildlife act.	Reject	The Simon Sandpits are currently characterised by a very large open body of water, which has, in part, replaced an ecologically rich dune habitat in St. Ouen's Bay. Para 10.98 recognises that Simon Sand and Gravel may come forward with proposals for controlled landfill at their quarry (which is scheduled to cease operating in 2018) and that this would provide opportunities to restore dune habitats. Clearly any restorative work would need to be limited, because of the sensitive nature of the local	The Minister is not minded to amend the draft Plan

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										landscape character, the acquired conservation value of the quarry and the desirability of ensuring that the conservation value of the site is enhanced. The company has a good record in sensitive habitat reclamation around the main quarrying area. Policy WM8 provides the means to ensure that the environmental impacts of any proposals for landfill / restoration at the site are satisfactorily controlled. Any associated EIA would address the sand martin colony issue. This issue is one of many that would have to be addressed by any future landfill / restoration proposals and, should any such proposals come forward, it is appropriate that they be considered on their individual merits. Incidentally, as reported in para. 10.101, the current Minister of P&E has given assurances that he will not permit landfill at the site during his tenure of office.	
DP223		Mr Stephen de Gruchy		Policy WM 8	Residual Waste And Terrestrial Landfill Sites	Supporting	Incidentally, I strongly support the Minister's stance regarding landfill at Simon Sand (paragraph 10.101) given its wildlife value (particularly given that it plays annual host to the only breeding sand martin colony in Jersey).		Support Noted	Any associated EIA would address the sand martin colony issue.	Support is noted by the Minister
DP225		Mr Stephen de Gruchy		Policy WM 9	Land Reclamation	Supporting			Support Noted	Noted	Support is noted by the Minister
DP226		Mr Stephen de Gruchy		Policy WM 10	Restoration Of Landfill Sites	Supporting			Support Noted	Noted	Support is noted by the Minister
DP227		Mr Stephen de Gruchy		Policy WM 11	Development in the Vicinity of Waste Management Facilities	Supporting			Support Noted	Noted	Support is noted by the Minister
DP228		Mr Stephen de Gruchy		Objective WM 2	Liquid Waste Management	Supporting			Support Noted		Support is noted by the Minister



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DP229		Mr Stephen de Gruchy		Policy LWM 1	Liquid Waste Minimisation and New Development	Supporting			Support Noted		Support is noted by the Minister
DP230		Mr Stephen de Gruchy		Policy LWM 2	Foul Sewerage Facilities	Supporting			Support Noted	Noted	Support is noted by the Minister
DP358		Mr Mike Waddington		Policy LWM 2	Foul Sewerage Facilities	Objecting	(a) The Minister for Planning & Environment (stress Environment ) should not be dodging responsibility for this by passing the buck to the Minister for TTS (as the DIP states) but should be ACCEPTING this technology where mains drains are not possible/practical. The technology for bio-digesters is proven and reliable- indeed more reliable than mains pumping stations (currently these are quite acceptable to Planning) as the bio-digesters have both duty and stand-by pumps. (be) If there is a concern about owner's maintaining these systems then they should simply be prosecuted under the Water Pollution legislation. (c) Policy NR2 should, I strongly feel, be re-written to allow or indeed promote proven 21st Century technology, over energy wasteful backward thinking.	On site drainage treatment plants (bio-digesters). Jersey is practically third-world in terms of its lack of mains drains to rural areas. The current reliance on tight-tanks and their associated emptying on a monthly basis is archaic and the carbon footprint, created by the lorries needed to evacuate the tanks and then transport the sewage for central treatment, must be enormous.	No change	The primary purpose of this policy is to ensure that the Island's water environments (i.e. streams, ponds, coastal waters, ground waters and reservoirs), which are among our most vital natural resources, are protected from contamination / pollution by effluent from new developments which rely on private non-mains sewerage. Such developments may, either individually or cumulatively, increase the risk of groundwater pollution, which has the potential to adversely affect the ecology and chemical quality of the water environment. To minimise the risk to public health and the local environment, it makes absolute sense to continue to support established policy of centralised sewage treatment, by: restricting the number of new developments being connected to non-mains sewerage; ensuring that new development connects to mains services wherever possible; and making provision for developer contributions towards necessary improvements to mains services, as appropriate. The first presumption to discharge into a public sewer, is in accord with UK Government advice (DETR Circular 03/99). This approach also ties in well with the spatial strategy which looks to concentrate new development in the Island's Built-up Areas (which are currently best served by the mains sewerage system)	The Minister is not minded to amend the draft Plan

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										and minimise / limit it in the countryside (principally in and around key village settlements where they can be more easily serviced). Contrary to the inference behind the objection, the Policy does recognise that the mains sewerage system does not cover the whole Island and that it will not be feasible for some developments to connect to the system. Where these developments are otherwise acceptable, they would need to rely on some means of on-site (non-mains) sewage treatment and the policy does make provision for them as exceptions. However, in order to protect the Island's water resources from the potential polluting effects of on-site sewerage treatment, the policy looks to ensure that the best alternative options sewage treatment are pursued, that sufficient information is made available on how the waste is to be treated to allow proper determination and that appropriate standards and conditions are met. The second option in the policy of considering a package treatment sewage treatment plant, where connection to the public sewer is not feasible is also in accord with the advice in DETR Circular 03/99. It also makes more sense to take a precautionary approach to policy formulation in this area to reduce the risk of pollution, rather than rely on prosecuting those responsible for pollution incidents (i.e. through poor maintenance of private non-mains sewage treatment plants) after the event. MR: Mike Waddington seems to be promoting the view that on site sewage treatment can be as good as, or better than, connecting to the public sewer, so there is no need to restrict development on	

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										<p>the grounds there is no sewer available. I'm not convinced this is true. This will always be a case for exceptions, as the policy says, but to promote decentralisation of sewage treatment is another matter. A bio digester simply means a tank which digests organic material biologically, and in that sense most sewage treatment systems can be called bio digesters. In practice, not all packaged treatments systems are designed to work in the same way, and this results in different treatment standards. I'm not aware of any commercially available bio digesters (which are normally designed to provide methane gas for cooking) which are designed for use with small scale development such as one or two houses. Systems are available for small holdings, and the like, where large quantities of manure are produced, but they are not without problems as the attached article shows. Whatever the type of system, consideration still needs to be given to what happens to the treated effluent. Ground percolation in many areas around the Island is not good so this is a risk that systems will fail, because land drainage systems don't work. TTS have plenty of evidence of this in the winter with existing systems. An argument could be made that because the treated effluent will be so good, it could discharge on the surface of the ground, but I'm not convinced this is better than a connection to the public sewer. To suggest the minister is dodging responsibility by passing the buck to TTS, is nonsense. The IP policy is looking at drainage corporately and supports an established policy of centralised sewage treatment, which for an island the size of Jersey, is surely the best option. The policy does</p>	

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										recognise the downsides of cesspools, which is why package treatment plants are allowed in certain circumstances.	
DP758		Paul Harding	The Association of Jersey Architects	Policy LWM 2	Foul Sewerage Facilities	Supporting	14.1 The AJA is delighted Policy LWM3 at last recognises replacing an old septic tank with a 'packaged treatment plant', otherwise known as Bio?digesters is a feasible, practical and environmentally sustainable solution allowable under this Policy. For the sake of consistency we trust appropriate Biodigester installations will be accepted for new developments otherwise meeting the Plan Policies and permissible.		Noted	Policy LWM2 'Foul Sewerage Facilities' clearly sets out when it may be acceptable for new developments to rely on non-mains drainage. The clear presumption is in favour of connection to the public foul sewer, to reduce the risk of pollution. Non-mains drainage will only be acceptable in exceptional circumstances. Essentially, where mains drainage is not feasible, for proposed developments that are considered appropriate for other planning reasons, the preferred option would be a packaged treatment plant. Only where this would be unreasonable would consideration be given to the use of other non-mains systems (e.g. septic tanks where these have performed adequately and tight tanks).	Support is noted by the Minister
DP872		Mr Stephen D Smith	Health Protection Services	Policy LWM 2	Foul Sewerage Facilities	Neither		The Department recommends that mains water is made available to those who wish to use it. There should be a continued commitment through the Island Plan to require mains water to be provided to all new development on Public Health grounds. This also applies to the continued requirement for the provision or extension of mains drainage to all new developments.	Reject although the public health benefits of what is proposed are recognised.	Whilst accepting the public health benefits of connecting new developments to the mains water supply, this would be difficult to enforce in every circumstance. It probably explains why previous Island Plans avoided any such policy statements and concentrated more on securing efficient use of water. That said, most new developments since the 1987 Island Plan have connected to the mains supply for practical reasons and/or to reflect developer or client expectations. Presently in Jersey, over 80% of the residential population receive mains water provided by Jersey Water and the remainder, largely but not entirely situated in rural locations are dependent on private supplies (drawing mainly on ground water resources). Mains water is treated to a high	Minister minded to amend plan; Recommendation 1: Amend sub-title on page 356 to read: "Water Capacity and Conservation" Recommendation 2: Add paragraph above para 9.17 to read "9.17 No new development should be permitted unless it can be shown that adequate water supplies are available for the development. In most cases, it will be necessary to connect to the treated water supply in the

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										<p>standard, whilst the alternatives of private wells, boreholes and rainwater tanks carry potential public health risks. In the foreseeable future, it is envisaged that in most instances developers will continue to choose to connect to the mains water supply, as a way of guaranteeing safe water in the quantities required. The 'spatial strategy' adopted in the draft Plan, which looks to concentrate new development in and around the built-up area will assist in making the mains water supply readily available for connection in most cases. However, there will continue to be exceptional circumstances where it is desirable for other planning reasons to permit developments requiring water in outlying rural areas where connection to the mains supply is not feasible, or where clients have a preference for borehole or well water. Such cases will need to be considered on their merits and they would also be subject to other legal requirements. The Building Byelaws aim to ensure that the quality of well and borehole water is protected by imposing minimum distances between the supply and the potential sources of pollution (e.g. domestic sewage disposal installations). The Water Resources (Jersey) Law, 2007 is also applicable. Among other things, it set out to protect and regulate the Island's water resources and to ensure sufficient water will be available for drinking, industry, agriculture etc. Under this law, all boreholes or wells proposed in new developments will need to be licensed and the license will cover the quantity and rate of water that may be extracted and the purposes for which it may be used. Although the notion of</p>	<p>mains and, where appropriate, advice will be sought from Jersey Water on whether or not the proposals will have an unacceptable impact on the capacity of mains water supplies."Recommendation 3: Change title of policy to "Water Capacity and Conservation). Recommendation 4: Add new sentence at the beginning of the Policy to read: "Developments will not normally be permitted unless adequate water supply is made available at the time of the development."</p>



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										ensuring all new developments connect to the mains water supply is not supported, it is considered important to have a policy which requires such developments to have an adequate water supply available (whether this be mains or other sources)	
DP231		Mr Stephen de Gruchy		Proposal 22	Surface Water Drainage Systems	Supporting			Support Noted	Noted	Support is noted by the Minister
DP232		Mr Stephen de Gruchy		Policy LWM 3	Surface Water Drainage Facilities	Supporting			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
DP233		Mr Stephen de Gruchy		Policy LWM 4	Sewage Treatment Works and Sewerage Outfall	Supporting	Support with caveat With reference to the second bullet point in paragraph 10.152, I have a concern that the Island could end up with too many significant public utility assets (e.g. fuel storage, liquid waste treatment, waste to energy plant, electricity station) in one small location. This could make the Island very vulnerable if there were to be major incident at La Collette (e.g. a 'Buncefield'). I therefore think Policy LWM4 should be required to factor that vulnerability in to any decision on relocating the existing Bellozane LWM plant to La Collette.		Support Noted	The point raised in the caveat about the vulnerability of the Sewage Treatment Works (and other public utility assets) should it relocate to La Collette is a valid one. However, I believe the policy criteria already allow for the issue to be addressed by any future application (as part of a balanced appraisal) without spelling it out. The matter is also addressed specifically by Policy NR5 'Safety Zones for Hazardous Installations' and the justification / explanation for that policy. In any event, the issue will also need to be carefully considered as part of the emerging 'Liquid Waste Strategy'.	The Minister is not minded to amend the draft Plan
Implementation & Monitoring											
DP594		Deputy John Le Fondre		11	Implementa- tion and Monitorin- g	Neither	The Island Plan is likely to be in place for a period of approximately 10 years, and it can take a long time to produce and get approved by the States Assembly. Circumstances will change over that period, yet there seems little scope for flexibility within certain policies. In general I am not in favour of too much subjectivity within a process (as that can also give rise to political difficulties and accusations), however there does need to be flexibility within the application of particular policies, but with appropriate checks and balances. Therefore the question that arises is what		Noted	The policies will be more flexible in nature as there will be greater scrutiny and review of them through the annual monitoring report. If the indicators highlight that certain policies are not meeting their objectives then these can quickly be identified and updated through the normal consultation route.	Noted by the Minister

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							mechanisms exist to allow variations in a policy, but without it being due to a 'whim' on behalf of an individual.				
DP598		Mr John Pinel		11	Implementation and Monitoring	Supporting		ECONOMIC GROWTH AND CHANGE One of the key actions from the Council of Minister's new Anti-inflation Strategy is that the Economic Development Minister is to advise the Planning and Environment Minister on how the new Island Plan can better facilitate productivity improvements. In particular, how the planning process can take account of market signals to ensure that land is put to its best economic use	support noted		Support is noted by the Minister
DP599		Mr John Pinel		11	Implementation and Monitoring	Supporting		Housing mix The 2007 Housing Needs Survey has revealed surpluses and deficits in the availability and access to different types and sizes of housing. Currently no dwelling mix policy is in place and developers may construct housing types and sizes in response to their own perception of market demand. If a dwelling mix policy - which set out the type of homes (houses or flats) and the size of homes that developers were encouraged to build - were to be introduced it would need to be flexible, taking into account year on year completions of dwellings of different types and sizes. This could be done through the annual Planning for Homes report, taking into account the current market information. The mixed use principle could be applied Island-wide and, could contain a mix of first time buyer, Jersey Homebuy, social rent family housing, life long housing and open market housing requirements	Comments noted		Noted by the Minister
DP881		Mr Andrew Heaven	Health Improvement (Public Health Department)	11	Implementation and Monitoring	Objecting	Public health should be explicitly included as one of the key outcomes for success and part of the overall vision for the future		Noted	Greater detail required from public Health Department on monitoring requirement. This to be reviewed as part of on-going monitoring indicator work and to be completed before plan is adopted.	Noted by the Minister
DP234		Mr Stephen de Gruchy		Policy IM 1	Plan - Monitor - Manage	Supporting			support noted	Noted	Support is noted by the Minister
DP31		Mr Terence Tanner		Policy IM 1	Plan - Monitor - Manage	Neither	We must recognise that short term gain is not always in the best interest of the public but a balanced portfolio geared to make our Island not only a prosperous little island but somewhere which is a nice place to live not only for the rich but for the little people who we need to do the dirty work not all sitting in front of a computer screen in an office.	Sometimes the government must govern for all the people not just for the rich and well to do of this island which was once a paradise to live and bring up your children but not any more our social problems are getting worse as the divide between them that have and them that struggle to keep this island a Paradise for those that want to feed their greed I am glad my children have said I will not be a grandfather as they can not afford to bring up children and live and work where we were better off twenty years ago	Comments noted		Noted by the Minister

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Appendix A - Supplementary Planning Guidance											
DP1020		Ray Shead	The Jersey Chamber of Commerce	Appendix A	Supplementary Planning Guidance	Objecting	There is a grave concern that the planning process will become even slower than it is now as it seems that agreement will need to be reached on travel plans, Design Statements, Planning obligations, Percentage for Art and Landscaping schemes or commuted payment.		Noted		Noted by the Minister
DP492		Mr Paul Harding	The Association of Jersey Architects	Appendix A	Supplementary Planning Guidance	Neither	Many AJA Members have expressed a common concern, also voiced in our representations about the 2002 Island Plan that introducing a new Island Plan without having the key SPG's in place runs the risk of leaving us in a Policy implementation vacuum. We have been waiting over too many years for SPG's, such as Parking & Housing Density, to be updated and released.	The 2009 Draft Plan Policies are, in many cases, aspirational and continued lack of supporting SPG's will leave interpretation open to inconsistent application between specific sites. Large parts of the 2009 Draft Plan relies on supporting SPG's that do not exist.	Noted	All relevant SPG's to policies outlined in the draft Plan will be available at the time, and in some cases before, the approval of the Plan by the States	Noted by the Minister
Appendix B – Housing Briefs											
DP1178		Deputy John Le Fondre		Appendix B	Draft Housing Development Briefs	Supporting	In addition, as a general observation, as I understand it, the Island Plan will form part of Planning Law, and will form part of any deliberations of any Court when considering appeals etc. Has legal advice been sought on some of the wording within the plan, as to whether it binds the Minister to give permission because developers have a reasonable expectation of a certain number of units, due to the wording of the plan. For example the draft housing briefs make reference to a minimum and maximum theoretical yield. Should something arise which might indicate that the yield should be lower than suggested, does the Minister have the power to set the number of units lower than the theoretical yield ? In the past, legal advice was that the developer had a reasonable expectation of a certain number of units, and that the Department / States must have known of the constraint when the area was rezoned. Hence it could not rightly be used to justify a lower number of units at a later date, which was when further work was being performed. I do welcome the theoretical maximum units, as this should give comfort and a degree of certainty to existing residents, and to developers.		Noted	The Island Plan is not part of the Planning and Building (Jersey) Law, but is made under the auspices of it. The law requires the Minister to have regard of the Island Plan when determining planning applications, and to generally grant permission if development is in accordance with it. The Minister may, however, grant permission that is inconsistent with the Plan where he or she considers there to be sufficient justification to do so. Legal advice will be sought on the Plan. As stated above, however, it is considered that the Minister is not bound by the Plan. Any decision that the Minister makes, and the justification for it, remains open to scrutiny and challenge through the appeal process, and is accessible to first and third parties in relation to approvals and refusals.	Noted by the Minister
DP374		MR Keith Shaw		Appendix B	Draft Housing Development Briefs	Objecting	Scrap the ideas re using green house sites as they can now easily be restored to growing land again If growing sites have to be used purchase at a price that reflects the real land value and ensure a pay back of any previous financial subsidy from public funds.		Reject	Whilst the potential restoration of these sites to agricultural use is noted and acknowledged, it is considered that there is a greater community benefit to be secured in the use of those sites identified for the provision of housing to	The Minister notes the comments made but is not minded to amend the draft Plan

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										help contribute towards the island's housing needs. The matter of reclaiming any public subsidy that may have been expended on their development is not a planning matter.	
DP533		Deputy John Le Fondre		Appendix B	Draft Housing Development Briefs	Neither	Housing Development Briefs - from memory quite some time was spent on planning briefs in the 2002 plan, and then there appeared (in my view) to be some divergence away from those briefs when applications were determined. The briefs in this plan seem to be far simpler, more consistent (in format) etc, however what is their status, and should these be identified in legal terminology within the plan ?		Reject	The status of development briefs is made clear in the introduction of Appendix B: they are designed to guide the delivery of homes on these sites and will be adopted as supplementary planning guidance. Whilst not considered necessary for the purposes of the Plan, development briefs, and other supplementary planning guidance, is issued by the Minister under the auspices of Article 6 of the Planning and Building (Jersey) Law 2002.	The Minister is not minded to amend the draft Plan
DP555		Deputy John Le Fondre		Appendix B	Draft Housing Development Briefs	Neither	General comment re planning guidance - as you will be aware I was one of the objectors in relation to the La Providence development. One of the matters raised at the time (by another politician) was about segregation of duties. I would stress this was in no way meant to be a criticism of the individual concerned, but it came from experiences that a number of us encounter in our professional lives, and if anything has become more relevant some years later. In my view (and others) where individuals within the department are significantly involved in possible rezoning of sites, preparation of detailed briefs, or often happen to process applications from any one particular individual or company etc etc there needs to be some form of independent, objective assessment in making recommendations as to whether an application should be approved or refused. This is in order that an independent view is seen to be being applied. This is particularly critical in a small Island when there are many overlapping circles of relationships, whether business or personal. In addition, as a general observation, as I understand it, the Island Plan will form part of Planning Law, and will form part of any deliberations of any Court when considering appeals etc. Has legal advice been sought on some of the wording within the plan, as to whether it binds the Minister to give permission because developers have a reasonable expectation of a certain number of units, due to the wording of the plan. For example the draft housing briefs make reference to a minimum and maximum theoretical yield. Should something arise which might indicate		Reject	The comment made is not material to the draft Plan; nevertheless, it's substance and inference is rejected. Planning officers seek to uphold high professional standards in the work that they do and in the provision of advice to the Minister and other decision-makers. The involvement of an officer in a range of professional tasks associated with a particular development site is not considered to be problematic and may, indeed, add value given the depth of knowledge likely to be derived. The advice offered to the Minister or any other decision-maker is evaluated by other senior officers in the department and is transparent and open to scrutiny. Any decision taken on the basis of this advice also remains open to independent and impartial evaluation through the appeals process, access to which is open to both first and third parties.	The Minister rejects the comments made

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							that the yield should be lower than suggested, does the Minister have the power to set the number of units lower than the theoretical yield ? In the past, legal advice was that the developer had a reasonable expectation of a certain number of units, and that the Department / States must have known of the constraint when the area was rezoned. Hence it could not rightly be used to justify a lower number of units at a later date, which was when further work was being performed. I do welcome the theoretical maximum units, as this should give comfort and a degree of certainty to existing residents, and to developers.				
DP787		Senator Terry Le Main	States of Jersey Housing Department	Appendix B	Draft Housing Development Briefs	Supporting	Appendix B - Draft Housing Development Briefs You will know that I am supportive of all of the sites B1 through B7 inclusive. What is vitally important is that we maximise the potential of these sites and ensure that we develop the right mix of homes. That includes the right mix of unit sizes but also as mentioned above not limiting ourselves just to Jersey Homebuy and First Time Buyer. We must have flexibility in respect of social housing units.		Agreed		Noted by the Minister
DP851		Mr Rod Mccloughlin		Appendix B	Draft Housing Development Briefs	Neither	The sites identified in the draft housing briefs have become available for potential development as a result of changes in the Island's agricultural and horticultural industries. In the context of the likely requirement for a percentage for art contribution on developments of this kind, such changes illustrate the potential to include cultural reference points in the briefs provided to artists and the importance of ensuring that developers are aware of the mechanism to connect with artists in this way.		Noted		Noted and supported by Minister
DP379		Mr David Dutson		B.1	De La Mare Nurseries, la Rue a Don, Grouville	Objecting	We believe that the proposal for houses on this site should be withdrawn from the plan. My wife and myself occupy a house overlooking the site	The site is clearly in the countryside being bounded on two sides by open fields. There should be a presumption against building in the countryside. The proposal for up to 37 homes would mean an additional 50 to 100 cars on the new estate requiring regular access at or near a junction of two major roads, especially at peak times. The junction is already awkward and it is easy to foresee accidents. The road to St Helier is narrow and houses in Longueville and Bagot roads are built close to the road with narrow pavements. In the rush hour traffic is already backed up to Rue des Pres and with more traffic it could easily reach Grouville Hill. The proposed houses would be built very close to the main road which would be unpleasant for the neighbours, passers by and the residents themselves. It would also highlight the obvious erosion of the Jersey countryside. In our opinion the case for further homes in the countryside has not been proven. New sites for	Reject	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	The Minister is not minded to amend the draft Plan



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								category A housing seem to appear constantly. These include the old J C G site, Westmount Quarry, Ann Court, Jersey Dairy, The Caesarean Tennis Club, and the Waterfront. All these sites are within or close to the built up area with existing infrastructure and requiring less traffic. In addition, with the gradual move of offices to the Esplanade area, redundant office space is likely to become available for housing in the coming decade. We hope that the States will take these opinions into consideration when deliberating the new Island Plan		routes/schools/shops and, where possible, were brownfield sites. This site met with all of these criteria. 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.	
DP387		Mr Andrew Townsend		B.1	De La Mare Nurseries, la Rue a Don, Grouville	Neither	Cat A Housing Site - De La Mare Nurseries, Grouville If this site is accepted for development I am pleased to see that not all of the site has been identified for housing. Travelling north along Rue a Don there is a very clear difference between the built up area to the east and the countryside to the west. The nursery's glasshouses are an accepted part of the rural landscape, but a residential development of the same extent would significantly alter the rural character of this view and area. For a housing development to blend with the character of the area, it should not extend too far to the west - no further than suggested on the draft map - the site's boundaries should be well landscaped and the scale of the houses restricted to 2 stories, not 3 or more. In addition, if the area suggested is developed, some glasshouses will remain and presumably will not be viable. To avoid future pressure for the redevelopment of these, they should be removed and the natural landscaped restored as part of any residential development. Thank you.	See Above	Noted	Noted	Noted by the Minister
DP482		Mr Charles Alluto	The National Trust for Jersey	B.1	De La Mare Nurseries, la Rue a Don, Grouville	Neither	Given the sensitive location of this site, the Trust would like to re-iterate the need for an extensive buffer zone and landscape restoration. The Trust would also suggest that planning gain could be used to help facilitate long term ecological and environmental improvements to the marsh itself.		Noted	These comments will be taken into account when the development brief is finalised	Noted by the Minister
DP14		Mr Howard		B.2	Glasshouse Site, Field 114, Le Passage, Carrefour Selous, St Lawrence	Objecting	Delete this from the Island Plan.	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	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	Minister minded to support request to remove site from Plan.

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								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.		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.	
DP377		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	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.

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							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.				
DP593		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 minded to correct error in Plan
DP796	Mr Michael Stein	Mr Michael Stein	MSPlanning Ltd	B.3	H2(3) Samares Nursery, La Grande Route de St Clement, St Clement	Supporting	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	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	The Minister is likely to recommend that this site is removed from the draft Island Plan given the Constable's opposition and the petition.

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								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 difficulty of development within St. Helier, the competing needs for land, and the lack of other available appropriate sites to provide Category A Housing which needs to be delivered in the short term . It is hoped that all the issues raised in this representation , supporting the re-zoning of Samares Nurseries site, will inform the Independent Examination in Public and lead to the retention of the site for Category A Housing.		has been withdrawn and so the request to remove this site is therefore supported by the Minister.	
DP1175		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	Minister minded to remove site from Plan.

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										has been withdrawn and so the request to remove this site is therefore supported by the Minister.	
DP1187		G V Gaudin		B.4	Longueville Nurseries, New York Lane, St Saviour	Objecting		G V Gaudin	Noted		The Minister is minded to withdraw the proposed zoning of the Longueville Nurseries site from the draft Plan
DP789		Senator Terry Le Main	States of Jersey Housing Department	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