



PLANNING & ENVIRONMENT DEPARTMENT

Draft Island Plan – White Paper

Strategic Policy Framework

Minister's Response to consultation

27th May 2010

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
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 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		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

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
							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 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.		Noted	Noted	Support is noted by the Minister
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.	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

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
								These points need to be stressed in the new Plan.			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 of the economy and the provision of community needs (ref 2.7-2.14)	The Minister is not minded to accept the comments made as they are already adequately addressed in the 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		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	Noted by the Minister

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
							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.			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	
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 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		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 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	The Minister notes the comments made but is not minded to amend the draft Plan as the issues raised are already adequately 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
							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.			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 McLachlan		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 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.	I think in view of the need to increase population for growth means that you will be storing up 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.	Reject	The draft Plan is responding to the objective of the States, as set 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	The Minister is not minded to amend the draft Plan as the issues raised are considered to be adequately 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
										new housing development in some of the northern rural parishes over the Plan period.	
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 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.		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 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	The Minister notes the comments made but 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
										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 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.	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 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.	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 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	The Minister is minded to reject the comments made as the issues raised are already adequately addressed in 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
										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 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.	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
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	Reject	The sequential approach to development adopted in the draft	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
								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.)		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)	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 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.	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 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	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, 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	The Minister is minded to reject the comments made as the issues raised are already adequately addressed by 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
								<p>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 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.</p>		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	
DP630		Richard	Jersey	Policy SP	Spatial	Supporting		The full consequences of the Island Plan on the	Noted	Noted	Support is noted

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
		Plaster	Electricity plc	1	Strategy			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			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 Society	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 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.		Noted	Noted	Support is noted by the Minister
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-		Noted	Noted	The Minister notes the qualified support

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
							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.				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 Paper would intend to promote grid electricity for heating purposes under the perception that it is	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	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
								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.		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 sites), and my department is / will be bringing		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 the subject of development briefs	Noted by the Minister

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
							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 ?			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		Noted	Noted	The Minister notes the qualified support for this part of 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
							upon the heart of St Helier. I 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	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
										developers about the planning objectives for a particular area; 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		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

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
							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 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	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	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

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
							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 .	regeneration and growth, as outlined in 4.24., 4.25 and 4.26			
DP499		Mr Paul Harding	The Association of Jersey Architects		Protecting the Natural and Historic Environment	Supporting	The AJA fully supports the Policy and supporting text, while pointing out a balance needs to be found between our built and natural environments.		Noted	Noted	The Minister 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.	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 importance 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

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
							50% of Islands waters to become "No Take Zones"				
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 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 Mccloughlin			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	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	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

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
							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.	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 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		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	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
							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 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 wimberle			Reducing Dependence on the	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

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
		y			Car						
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 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.	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 would otherwise seriously constrain their travel options.	The Minister notes the comments made but is not minded to amend the 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		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

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
							increasing (or at least congestion during the daily commute).				
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 Harding	The Association of Jersey Architects		Better by Design	Neither	We are disappointed para. 2.71 fails to recognise 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.		Reject	This section of the draft Plan 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'.	The Minister is not minded to amend the draft Plan and the issue raised is already adequately addressed
DP909		mr daniel wimberley			Better by Design	Supporting		The recognition that in design and building, 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