

The proposed rezoning of field 622 should be rejected on a number of grounds which I set out below:

Natural environment

Section reference	Relevance to Field 622
Policy NE1	Development of the site would adversely affect hedgerows, trees, flora and fauna, historical banques, fosses and enclosures, potential drainage onto the marsh areas and impact on agriculture.
NE2.1	Any development on Green zone will adversely affect the natural environment and development on an agricultural field also damages the economy of the rural environment.
NE2.7	Development of the Green Zone is in direct contravention of the Commitment the Island has made in this regard.
NE2.9	The proposed development will cause an adverse impact to the natural environment with a loss of a field; loss of trees and hedgerows; intrusion of building and materials; the pollution of water courses and damage to food chains.

Site Selection

Potential development sites should be selected according to a strict priority:

1. Built up areas
2. Brownfield sites
3. Ex glasshouse sites
4. Greenfields – not actively farmed (poor quality/awkward shape etc.)
5. Greenfields – actively farmed

The general concept of NE7 is that applications for the permanent loss of good agricultural land for development or other purposes will not be permitted in accordance with safeguarding agricultural land.

The urban regeneration objective of the IPR is not satisfied by identification of Green Zone land.

Supply and demand

Review of the 2013 Residential Land Availability Report clearly states that the current position is 'currently favourable' with a 12% over supply of category A and B homes up to 2017. There is a policy to bank excess land supply for future need. It would be my contention that Green zone land is too precious to be simply held like stock in trade. Green zone development must be for a specific, highly important priority project that fits with plan led policy. In this case all 5 conditions of policy H5 should be satisfied. NE 2.85 also states that new dwellings and other buildings in the Green Zone can only be justified where there is **strong justification** related to essential development requirement for a countryside location and where alternative provision cannot be made or found within the built up area.

Proposal 15

The eastern edge of Field 622 has long been the village boundary west of which no further development would be permitted (Barette Report and 1973 IP). Whether St Ouen's village needs to expand and in which direction is a matter for the Parishioners to decide. Such decision would be based on the objectives set out in Proposal 15. The village plan should evidence demonstrable consideration of:

1. Preferred direction of village expansion taking into account the natural environment
2. Community needs – school capacity, youth activities, entertainment
3. Infrastructure – drainage, water supply, services
4. Alternative sites (NE7) – environmental impact analysis, feasibility study of each

It is not appropriate to rezone green field sites based on ad-hoc decisions. Without a village plan such rezoning amounts only to piece meal development or creeping urbanisation. The risks associated with such development of the green zone are too great and do not accord with SP1 of the IP.

Conclusion

- Field 622 should not be put forward for re-zoning as it does not accord with the policies set out in the 2011 IP in respect of the natural environment and the rural economy.
- The site selection process is flawed and not in accordance with the priority that should be given to urban development. St Ouen has put forward a further site under policy H5 of the IPR which is further up the priority scale being Field 785.
- With supply exceeding demand time is on the side of the Department of Environment to identify further sites with less environmental impact.
- Any rezoning in and around St Ouen's village should be in accordance with Proposal 15 and a village plan in order to avoid piece meal development or creeping urbanisation.