

I previously made what was intended to be a constructive suggestion that the development be primarily or entirely for over 55s to address a number of concerns raised. I note that both the site owner and the Parish also support a re-allocation of the site for over 55's and First Time Buyers, rather than the tenure split proposed.

I am surprised that the primary school has capacity and would ask that the Minister be assured that this is an up to date assessment based not only on this development but also that at Jersey Pottery - a combined total of over 100 new dwellings.

My greatest concern is that any development must not have a detrimental impact upon the character of the area particularly given the prominence of the site. The yield has not yet been proven to be compatible with the character of the area and in reality is based on a density double that of the area – see Density Calculations below.

The Minister notes that policy GD3 requires that the best use of a site be made subject to good design – including site layout, massing, landscaping etc. The supporting paragraph 1.16 acknowledges however that other policies such as GD1 and SP7 must also be taken into account and are not overridden by GD3, nor the generic *urban* UK standards.

It would be fundamentally wrong on new designated housing sites, to set aside the high standards of design required on all other developments. If anything, as they often sit in sensitive locations on the edge of the countryside, even greater care should be taken. Any new development on currently Green Zone land should complement and reflect its surroundings, not dominate or harm them.

The Countryside Character Appraisal (CCA) states that there “is very limited capacity to accept new development and ...this area should have high levels of protection.” It would not seem reasonable to go from these “high levels of protection” to a development at a far higher density than the established Built Up Area adjacent to it.

If a yield is stated in the Plan a developer would expect to achieve it. The Minister's hands would then be largely tied when dealing with the planning application. Until a specific scheme has been assessed I maintain that to state a specific yield is premature.

I would also reiterate my comment that the area shown for development should be the maximum, with the remaining buildings demolished. Attached at Appendix 1 is a photograph of the site viewed from the south west travelling towards Gorey. The site is prominent in this view. If the site were to widen towards the west, it would appear to sprawl out into the countryside.

Since the site was put forward for Housing, an application has been submitted for the construction of a Co-Op supermarket on part of it. This will reduce the area available for housing but should not justify an expansion of the proposed housing site.

The site has shortcomings, notably the issues raised by TTS and drainage. The former will not be resolved by a modest contribution to public transport and a lowered parking standard, which in my experience usually only achieve something like a bus shelter, and unsightly haphazard on-street parking. Moreover, although the CCA notes that “any development in the vicinity of Grouville Marsh is likely to have a major effect on this important nature conservation area”, the response to IR(1)-87 notes this has yet to be fully assessed.

I maintain that a dense development of family houses will struggle to address these concerns, but a development of smaller over 55s units, with lesser requirements for car parking, amenity space and drainage, and a potentially lower number of vehicle

movements, could achieve a more efficient use of the site without harm to the character of the area, addressing the other concerns raised .

Thank you for your consideration.

A Townsend
13 December 2013

Density Calculations

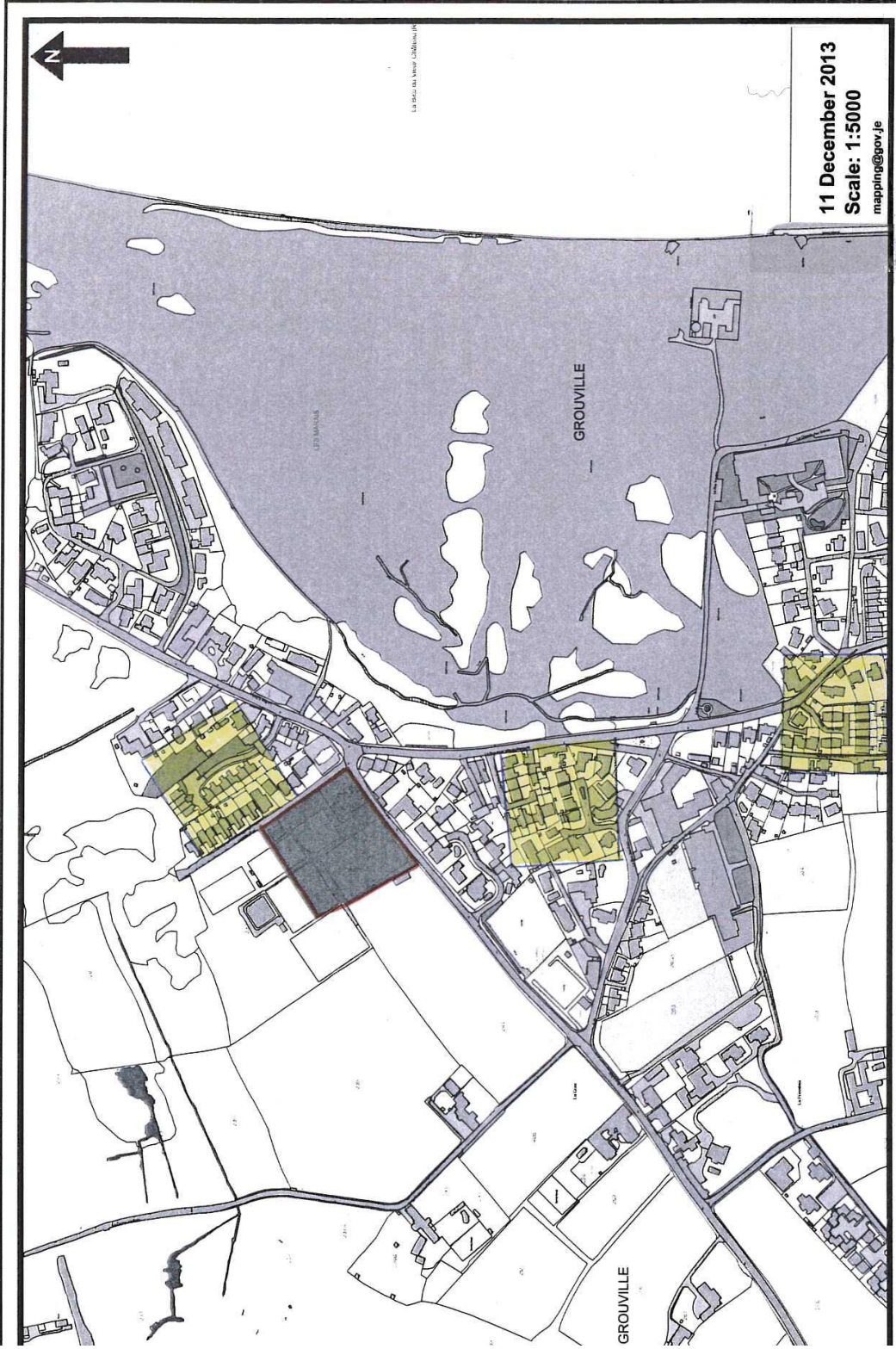
To put the proposed yield into perspective the site is shown on the Map at Appendix 2, which also shows 3 yellow boxes of approximately the same size as the proposed site. These accommodate around 23-25 dwellings each. To achieve 40-50 family sized houses, the density proposed at De La Mare Nurseries would therefore be up to double that of these areas.

The site measures approximately 98 metres by 101 metres giving a total of 9943 sqm or 2.46 acres rather than the 3 acres in the Consultation Draft. A yield of fifty dwellings would therefore require a density of 20 dwellings per acre. The density of the “yellow box” areas is around half that at 10.2 dwellings to the acre. This accords with the Minister’s response to representation IR(1)-65. However it portrays a density 30% lower than the 13-14 dwellings per acre stated in the Consultation Draft wherein the proposed yield was set.

Appendices

1. Photograph
2. Density Comparison





11 December 2013
Scale: 1:5000
mapping@gov.je



La Région de la Vallée d'Aix

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