



2011 Island Plan: interim review

# Minister's response to consultation: volume 1

December 2013

## Introduction

The Minister for Planning and Environment wishes to revise parts of the 2011 Island Plan. He has publicized his proposals and invited members of the public and any other interested parties to submit comments on the proposed revisions. He has also appointed independent planning inspectors to conduct an examination in public at which any representations that have been made might be heard in public. This will take place in January 2014.

The consultation on the Minister's proposals took place from 30 July to 25 September 2013 and over 200 people or organisations have submitted representations: these are set out in two volumes, together with the Minister's initial views on the representations that have been made.

A further opportunity was then provided, between 27 November and 13 December, for comments to be submitted on the representations that people had made and, in some instances, to submit new representations.

Both first and second round representations are set out in the following two volumes, together with the Minister's comments on them.

- **Volume 1:** this deals with all representations, and the Minister's initial response to them, relating to the form and content of the policies that Minister is proposing to amend. The representations have been considered relative to the policies to which they relate. Where comments are general in nature, these have been dealt with separately at the end of the document as have various miscellaneous comments.
- **Volume 2:** this deals with all representations that have been received which are proposing that the Minister gives consideration to the potential rezoning of additional land to meet the need for housing in the Island. These representations are essentially related to the proposed amendment of Policies H1 and H5 of the 2011 Island Plan. The Minister has sought to assess the suitability of these sites for housing development having regard to a set of criteria which seeks to determine how well these proposals might fit with the existing planning policy framework and to set out his initial response to them.

Taken together, these two volumes seek to provide the Minister's initial consideration of the representations received based on his current analysis of them.

His initial analysis serves to highlight and respond to the points considered significant by the Minister. The Minister is also able to recommend to the inspectors particular matters to be examined by them. Where, in the view of the Minister there has been no material change to the circumstances relating, in particular, to sites proposed for housing previously examined for the 2011 Island Plan the Minister has recommended, on the grounds of efficiency, that they are not reviewed afresh: the Inspectors' previous and recent views on them are already known.

In setting out his analysis, the Minister has also made reference to particular information, plans, policies and strategies that are considered to be of relevance.

The inspectors will independently consider these issues and draw up a list of topics and participants to best enable discussion of the issues that they consider are most relevant and which require consideration at the forthcoming examination in public.

**Department of the Environment**

December 2013

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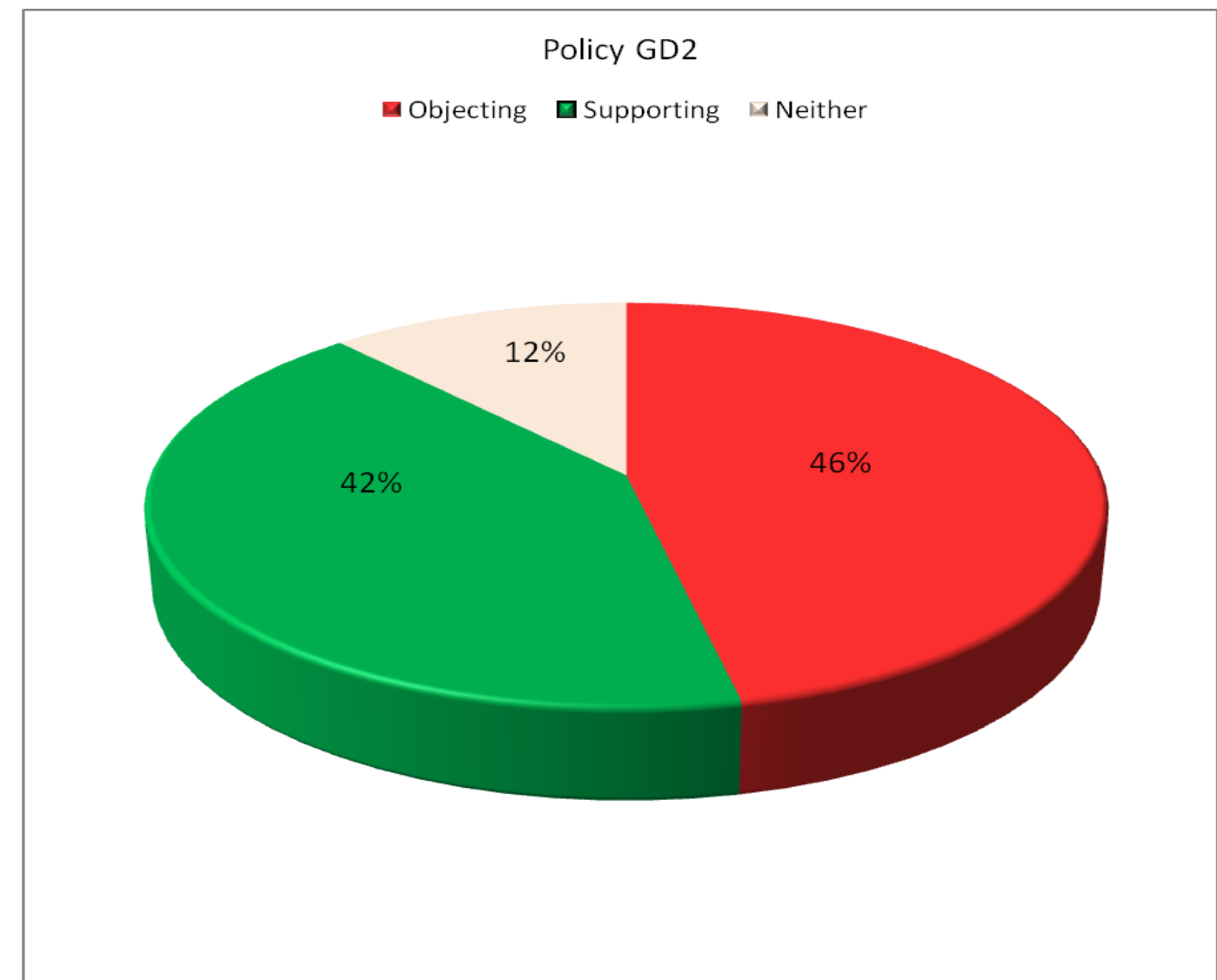
## Policy GD2 - Demolition and replacement of building

The Minister for Planning and Environment proposes to **remove Policy GD2: Demolition and replacement of buildings** from the 2011 Island Plan and all subsequent references to it.

It is not considered that the policy provides a sufficiently robust basis for rational and consistent decisions on planning applications: the full justification for this proposal is set out in **Briefing Paper: Demolition and replacement of buildings**.

### Questionnaire consultation results

	% Total	% Answer	Count
Number of responses	27%	-	60
Objecting	13%	47%	28
Supporting	11%	42%	25
Neither	3%	12%	7
[No response]	73%	-	159
<b>Total</b>	<b>100%</b>	<b>100%</b>	<b>219</b>



## Policy GD2 - Demolition and replacement of building - comments

Ref	Name	Agent/ Organisation	Supporting/ Objecting	Reasons for answer	Minister's Response
IR(1) -87	Anonymous		Neither	This should also include: buildings cannot be demolished and rebuilt/redeveloped purely for commercial purposes, including agricultural buildings.	<p>Planning is concerned with the use of land, including development and re-development of existing buildings. Through the Island Plan, it seeks to direct and control the nature of the built environment and accommodate the need for change by a sensible blend of conservation and exploitation of land in the interests of the Island community as a whole. In so doing, it intervenes in private sector decision making and prevents a <i>laissez-faire</i> free-market situation whereby land is used purely to extract the largest financial return.</p> <p>Planning applications for any form of development, however, are usually proposed because they will bring immediate benefits for the applicant. Applicants have the right to do this and all such applications must be considered on their individual merits have regard to the policies in the Island Plan (both topic based and area based), any relevant supplementary planning guidance and any other material planning and technical considerations.</p> <p>In view of the above, it would not be appropriate to prevent redevelopment just because the aim is to make a profit. Nor should this be prevented because the proposal involves the development of commercial land uses (e.g. shops, offices, restaurants, industry, hotels etc.), unless it contravenes approved policies and there are no exceptional circumstances which warrant a departure from the policies.</p> <p>On a point of detail, it should be noted that the demolition of agricultural buildings and commercial glasshouses are permitted development under Part 7 of the Planning and Building (General Development) (Jersey) Order, 2011. There are also various other policies in the Island Plan which specifically address the redevelopment or removal of agricultural buildings, including: NE6 (Coastal National Park), NE7 (Green Zone), ERE6 (Agricultural buildings, extensions and horticultural structures), and ERE7 (Derelict and redundant glasshouses).</p> <p>The Minister is not minded to amend his proposal.</p>
IR(1) -10	Anonymous		Objecting	This is still needed as far as I can see if a building can be saved its better for the environment as there is less work involved and is the greener option. to demolish and rebuild you have to have heavy plant usage for both operations were as to refurbish may be a skip and a mixer.	<p>In bringing forward the proposal to omit Policy GD2, the Minister has acknowledged that refurbishment and reuse of buildings rather than demolition and rebuild can often bring about certain sustainability benefits, including: protection of the historic environment and wildlife habitats, reduced consumption of natural resources, lower embodied carbon inputs, reduced waste generation, less landfill, reduced transportation of materials and waste etc.</p> <p>That said, the Minister does not think it appropriate to continue with an inflexible policy which primarily seeks to prevent demolition of any building if it is "<i>appropriate in sustainability terms to repair and refurbish</i>", particularly as there is:</p> <ul style="list-style-type: none"> <li>• uncertainty about what is actually meant by sustainability (and its different components);</li> <li>• no simple common or reliable analysis tool currently available to measure the sustainability of development projects;</li> <li>• no acknowledgement that there may be other reasons why it might be appropriate to support demolition and rebuilding even if it might appear to be more environmentally sustainable to repair and refurbish it.</li> </ul> <p>It might not be appropriate to retain an existing building, for example, when it is in very poor structural condition; it makes no positive contribution to or detracts from the character, appearance and quality of its surroundings; or it would not be economically viable to repair or refurbish. There will also be occasions when the retention of a building would prevent wider public benefits flowing from the redevelopment of a site.</p> <p>Each development proposal needs to be considered on its individual merits, having regard to all relevant material planning considerations, before a decision is made.</p>

Ref	Name	Agent/ Organisation	Supporting/ Objecting	Reasons for answer	Minister's Response
					<p>Of course, the achievement of sustainable development is a major objective of the local planning system and remains a major theme underpinning the Island Plan and its suite of strategic planning policies. Determining whether a development is sustainable, however, is something much more than assessing whether an existing building is retained or not. There are many aspects of sustainability that need to be addressed, including:</p> <ul style="list-style-type: none"> <li>- <b>Land use and location</b> (is it the right use in the right place, having regard to the approved 'spatial strategy'?);</li> <li>- <b>Transport</b> (is the development accessible by modes other than the car?);</li> <li>- <b>Energy</b> (is the development energy efficient? does it maximise sunlight?, is there provision for renewable energy?)</li> <li>- <b>Waste</b> (do the proposals include good waste management? Has provision been made for recycling and composting facilities? Are there water efficiency measures? Does the project use recycled/reused building materials?)</li> <li>- <b>Community development</b> (is the scheme designed with community safety and access for all in mind? Has there been meaningful consultation with the local community?)</li> <li>- <b>Biodiversity and open environment</b> (Does the scheme protect or enhance the natural environment? Has there been any loss of land or biodiversity? Has best practice been observed in tree protection and planting?)</li> <li>- <b>Built environment</b> (is the scheme on previously developed land? Does it involve the renovation of existing buildings? Is heritage value protected? Does the scheme represent good quality design? Does the scheme respect the relationship with neighbouring properties?)</li> <li>- <b>Pollution</b> (Does the development cause air, water, land or noise pollution? Is the scheme affected by these pollution problems? Are measures planned to eliminate the pollution problems?)</li> <li>- <b>Human activity</b> (Does the scheme create 'paid employment'? Does it make available commercial and social goods and services for local consumption? Does the scheme support community-based cultural activity?).</li> </ul> <p>The remaining policies in the Island Plan allow for all of these aspects of sustainability to be addressed in planning and deciding upon development proposals. Nearly all of the policies relate either directly or indirectly to sustainable development principles.</p> <p>The Minister believes that there are better ways to test the sustainability of all significant development proposals and not just proposals involving the demolition of a building/s.</p> <p>Policy SP7 (Better by Design) requires appropriate planning applications to be accompanied by a 'Design Statement' to <i>"demonstrate and explain how the principles of good design have been incorporated into the development proposal"</i>. The supporting text for policy GD7 (Design Quality) suggests that in the interests of sustainability, the design statement should normally include a 'Statement of Sustainability'.</p> <p>Design statements, under the auspices of SPG issued in December 2006 (Advice note 4), are already required to include an environmental statement dealing with waste management, type and sourcing of construction materials, water consumption and how the proposed building meets the increasing need for thermally efficient structures. In particular it should demonstrate best practice in terms of energy efficiency, minimising carbon emissions and demand on limited resources, such as water.</p> <p>The Minister is minded to review the requirements of design statements to ensure that they include the requirement to provide a simple 'Sustainability Checklist' based on the aspects of sustainability referred to above. This should be designed to help applicants and decision makers quickly assess the wider sustainability consequences of developments and to assist applicants in completing sustainability statements.</p>
IR(1) -18	Anonymous		Objecting	Further flexibility in the hands of Planning is considered undesirable.	Comments noted.
IR(1) -91	Anonymous		Objecting	The majority of 'listed' buildings are not yet listed and as such the removal of this policy	The Minister does not accept that the proposed removal of this policy leaves the Island's



Ref	Name	Agent/ Organisation	Supporting/ Objecting	Reasons for answer	Minister's Response
				<p>may leave 'potential listed buildings' open to demolition or partial demolition without the need to apply for any consent.</p> <p>The first part of this policy must be retained until the 'potential listed buildings' are actually listed - we have already seen the results of such demolition to often</p>	<p>heritage assets at risk of demolition.</p> <p>There are over 3,500 buildings and places that could be Listed in Jersey. All potential heritage assets have been resurveyed as part of the 'Historic Environment Review' and the majority are waiting to be formally Listed. This process was due to be complete by the end of the year but has been delayed by a legal challenge: this is due to be determined by the end of 2013.</p> <p>To date, over 350 buildings and places have been formally Listed following the completion of the prescribed administrative process and enjoy the full statutory and policy protection enjoyed by Listed buildings and places.</p> <p>Planning permission is, however, still required for the demolition or partial demolition of all potential Listed buildings.</p> <p>The value of heritage assets – whether formally Listed or in the process of being considered for Listing - also remains to be considered as a material consideration in its own right as part of the determination of planning applications. All potential Listed buildings and places will also enjoy policy protection under the auspices of 2011 Island Plan Policy SP4: Protecting the natural and historic environment, which gives high priority to the protection of “<i>the Island's heritage assets – its archaeology, historic buildings, structures and places...</i>”.</p> <p>On the basis of the above, the Minister is not minded to retain the policy.</p>
IR(1) -83	Celia Scott-Warren		Objecting	GD2 is a policy that acts as a safeguard.	<p>There are many safeguards retained in the Island Plan to help secure sustainable development.</p> <p>See response under reference IR(1)-10 above.</p> <p>The Minister is not minded to retain the policy.</p>
IR(1) -138	Deputy John Young	States Member (St. Brelade No.1); Chairman of the Environment Scrutiny Panel	Objecting	<p>The proposed Loss of Policy GD2 is a retrograde step.</p> <p>It seems that the Planners difficulty in evidencing this policy is the reason behind its proposed demise. This is insufficient reason and the Principle of the policy is right.</p> <p>The Policy should be retained and a method of making the appropriate judgements should be found.</p>	<p>The Minister has cited three basic reasons why Policy GD2 should be omitted from the Island Plan (see briefing paper: July 2013).</p> <p>Firstly, the policy is too inflexible in adopting an absolute presumption against demolition of a building if it is appropriate in sustainability terms to repair and refurbish it. Whilst there may be merit in promoting more reuse of buildings, there may be many reasons why it might be appropriate to support individual proposals for demolition and rebuild, which override certain sustainability aspects. It is considered better, therefore, to consider each case on its individual merits.</p> <p>Secondly, it is true that there is no common or reliable analysis tool that can be used at this time to measure the relative sustainability of demolition and rebuild proposals compared with refurbishment options. As a consequence, there is widespread confusion among applicants and decision makers about what is meant by “<i>appropriate in sustainability terms to repair or refurbish</i>”.</p> <p>Thirdly, leaving aside the ‘sustainability test’, the other tests / criteria in the policy are effectively superfluous being covered by policies elsewhere in the Plan (e.g. protecting Listed buildings, protecting species, harmful demolition in Conservation Areas etc).</p> <p>It is important, however, to properly consider the wider sustainability consequences of significant planning applications and not only those which involve demolition of a building. The Minister is, therefore, minded to review the requirements of design statements to ensure that they include the requirement to provide a simple ‘Sustainability Checklist’ based on the aspects of sustainability referred to in the response to IR(1) – 10 above.</p> <p>The Minister is not minded to retain the policy.</p>
IR(1) -134	Jeremy Snowden		Objecting	<p>The intention behind GD2, as expressed in "Background" in the briefing paper is sound. To consider deleting the policy, as it is difficult to assess sustainability is a weak excuse. It seems the Minister wishes to remove "Environment" from his title.</p> <p>The briefing paper accepts that the sustainability test has been "skirted over by applicants and the decision makers". Whilst it is to be expected that applicants would seek to skirt it over, it is scandalous that the decision makers, i.e. planning officers, Applications Panel etc, have done so. Just because something is difficult are not</p>	<p>See responses under references IR(1)-134 and IR(1)-10.</p>

Ref	Name	Agent/ Organisation	Supporting/ Objecting	Reasons for answer	Minister's Response
				grounds to ignore it if it is important. Sustainability assessments are widely used around the world, perhaps some training for the decision makers would help.	
IR(1) -176	Martin Whitley	La Comité du Commune Rurale St. Jean	Objecting	<p>The Comité has an issue with the definition of 'unacceptable impact' in 3. This needs to consider the greater economic benefits that may provide overriding justification for removal.</p> <p>1 and 5 are subjective.</p> <p>There needs to be greater clarification of the definition of sustainability and in 5 'enhance the appearance' is hugely subjective.</p> <p>In 6, who decides whether it is appropriate to repair or refurbish?</p>	<p>It is noted that the general tenor of this representation appears to be against Policy GD2 in its present form. It calls into question the "subjectivity" of some of the wording (e.g. 'unacceptable impact', 'appropriate in sustainability terms to repair and refurbish', 'enhance the appearance of'); it calls for clarification of what is meant by 'sustainability'; and it emphasises the need to consider potential overriding economic benefits in considering proposals for demolition.</p> <p>All of these concerns add weight to the Minister's proposal to omit the policy from the plan and to pursue a 'Sustainability Checklist' approach for significant applications and projects, irrespective of whether or not they involve demolition (see response under reference IR(1)-10).</p>
				The Comité recommends that policy HE1. Historic Buildings, is further reviewed particularly in light of Sion Church.	Policy HE1: Protecting Listed buildings and places is not part of this interim review and the general presumption will remain in favour of protecting the best and most special of the Island's buildings and places of architectural and historic interest.
IR(1) -17	Mr John Shenton		Objecting	<p>The question wording is slightly ambiguous in that one is supporting the removal of the policy (therefore objecting to GD2) that requires the re-use of buildings in the vast majority of cases.</p> <p>Building materials / architecture has moved on substantially and the preservation of all old buildings should not be a priority. As there is certainly restricted funding within the economy at present to request that developers incur unreasonable costs preserving building that have little or no architectural / heritage value will simply deter redevelopment.</p> <p>The policy should be to concentrate on a smaller number of buildings that merit preservation and consider a small levy (similar to the money for art) on the demolition of certain buildings to provide funds for the preservation of heritage / correctly listed buildings that are uneconomic for develops to develop.</p>	<p>The support for removing Policy GD2 and the reasons given are noted and help to highlight why decisions about demolition or refurbishment need to be considered on their individual merits.</p> <p>The suggestion about imposing a levy on the demolition of certain buildings to provide funds for preservation of heritage buildings is not directly germane to the current proposed changes to the Island Plan.</p>
IR(1) -26	Mrs Judy Martin	States Member (St. Helier No.1)	Objecting	Would need to see policy that would replace this one	<p>Most of the criteria included in Policy GD2 are already included in policies elsewhere in the Plan. The only aspect not specifically addressed elsewhere is the presumption against demolition of a building if it is appropriate in sustainability terms to repair and refurbish it. There is no intention to replace this aspect with a new policy.</p> <p>The Minister intends, however, to ensure that proper consideration is given to the wider sustainability consequences of significant planning applications (and not only those which involve demolition of a building).</p> <p>The Minister is minded to review the requirements of design statements to ensure that they include the requirement to provide a simple 'Sustainability Checklist' based on the aspects of sustainability referred to at IR(1)-10 above. This should be designed to help applicants and decision makers quickly assess the wider sustainability consequences of developments.</p>
IR(1) -133	R Anthony	Société Jersiaise	Objecting	<p>I consider that this policy gave protection to buildings that could be believed to be either of value or did not warrant demolition. The policy would have been given full attention when first proposed and was found by the general public and the States to be desirable and commendable and to have a role to play.</p> <p>The reasons being given for its removal are that sustainability has proved to be difficult to measure and assess. This is said to pose challenges for decision-makers as well as applicants and their agents. Difficulty in implementation of a policy is not a good argument for removal. If anything it is a strong argument for its relevance. The fact that it is referred to in a number of other policies where it is seen to be relevant is a further argument for its retention.</p>	<p>The removal of Policy GD2 does not mean that there will be no protection for buildings of value. Island Plan Policy SP4 will continue to give a high priority to the protection of the Island's heritage assets and seeks to ensure that the Island's "archaeology, historic buildings, structures and places – which contribute to and define its unique character and identity will be key material considerations in the determination of planning applications".</p> <p>Considering applications for the demolition of any buildings on their individual merits, having regard to all material planning factors and their relative weighting, is the best way to determine whether or not demolition is warranted. The Minister's intention to require the submission of a 'Sustainability Checklist' will be a considerable help in this regard</p>



Ref	Name	Agent/ Organisation	Supporting/ Objecting	Reasons for answer	Minister's Response
				Sustainability is a major theme in the Island Plan. Its removal from among the GD policies that set the tone for the whole plan because of difficulty in implementation will be seen by developers as an indication that it is a ground worth contesting.	(see response to IR(1)-10).
IR(1) -181	Vivien Vibert		Objecting	<p>If, as is stated in the briefing document, this policy is not sufficiently robust, then it should be amended rather than deleted.</p> <p>The principle of re-using buildings for sustainable development needs to be upheld, and the proposal to delete it is unacceptable and appears to be a sop to developers and the construction industry.</p>	<p>The only part of Policy GD2 that is not covered by other Island Plan policies is the presumption against demolition of a building if it is appropriate in sustainability terms to repair and refurbish it. Whilst it may be possible to amend the policy to explain more fully what is meant by sustainability, it is not considered that this would overcome the basic problems with the policy, which are identified in the Briefing Paper.</p> <p>The Minister remains of the view that the removal of Policy GD2 is the best course of action (see response to IR(1)-10).</p> <p>The achievement of sustainable development is a major objective of the local planning system and will remain a major theme underpinning the Island Plan policies. The Minister's intention to introduce a 'Sustainability Checklist' for testing the sustainability of significant development proposals (whether or not they involve demolition of a building/s) is considered to offer a better way forward in this regard.</p>
IR(1) -4	Anonymous		Supporting	we need to preserve our heritage	<p>Heritage in its widest sense refers to something inherited from the past and it is assumed the respondent in this instance is referring to cultural heritage in the form of buildings and man-made structures and natural heritage in the form of flora and fauna and historic landscape. Our Island enjoys a rich heritage of historic buildings, structures, monuments, archaeological remains, places, landscapes and wildlife habitats, which contribute to and help define its unique character and identity.</p> <p>It remains a key strategic principle and priority of the 2011 Island Plan to protect the natural and historic environment, as set out Policy SP4: Protecting the natural and historic environment and this will be unaffected by the omission of Policy GD2.</p> <p>Most of the tests in Policy GD2 addressing heritage are covered by other Island Plan policies, including:</p> <ul style="list-style-type: none"> <li>- Policy HE1 'Protecting Listed buildings and places';</li> <li>- Policy HE4 'Demolition in Conservation Areas';</li> <li>- Policy NE2 'Species protection'.</li> </ul> <p>There are also other Island Plan policies which address whether or not any proposed development, including demolition and rebuild, will have an unacceptable impact on the character and amenity of the area and/or the natural and historic environment and/or the landscape and built context, including:</p> <ul style="list-style-type: none"> <li>- Policy GD1 'General development considerations';</li> <li>- Policy GD7 'Design quality';</li> <li>- NE6 'Coastal National Park';</li> <li>- NE7 'Green Zone';</li> <li>- HE3 'Preservation or enhancement of Conservation Areas'; and</li> <li>- HE4 'Demolition in Conservation Areas'.</li> </ul> <p>These policies will allow decision makers, when considering application for demolition and rebuild, to consider the worth of the existing building/s from a heritage perspective and whether or not the proposed rebuild will result in demonstrable and overriding environmental or community benefits.</p>
IR(1) -25	Carlo Riva	Riva Architects	Supporting	<p>The presumption AGAINST demolition unless sufficient justification is offered is too onerous for applicants. While applicants should be actively encouraged to work with existing structures instead of accepting the principle of OBSOLESCENCE, the planning approach should be less rigorous and stringent. The presumption against demolition should be restricted to listed structures.</p> <p>In so doing, property owners may be encouraged to embrace more environmentally sustainable buildings whose life time energy costs will be far lower than certain existing outworn structures.</p>	Comments noted.

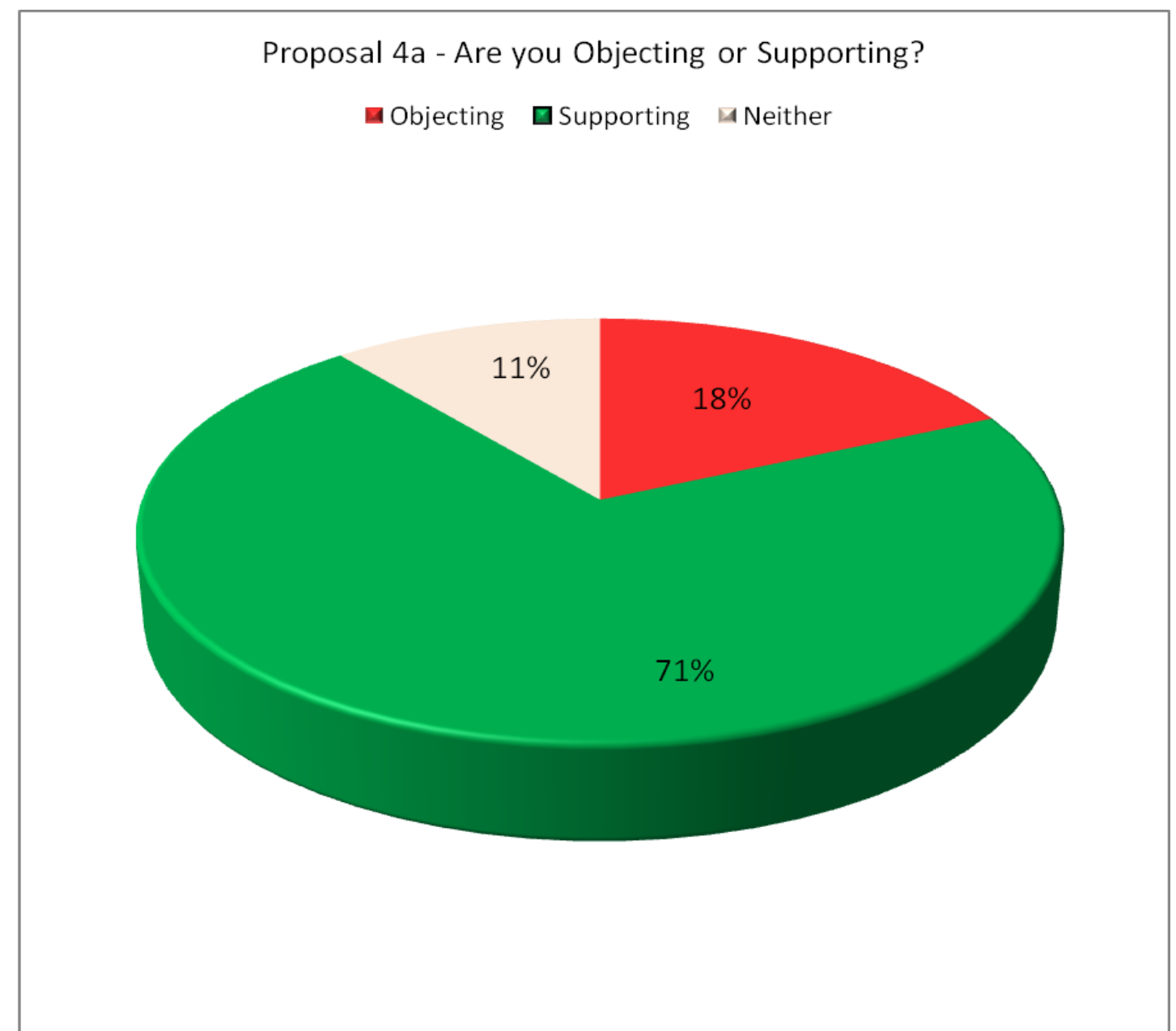
Ref	Name	Agent/ Organisation	Supporting/ Objecting	Reasons for answer	Minister's Response
IR(1) -114	Carlo Riva	The Association of Jersey Architects	Supporting	<p>The presumption AGAINST demolition unless sufficient justification is offered is too onerous for applicants. While applicants should be actively encouraged to work with existing structures instead of accepting the principle of OBSOLESCENCE, the planning approach should be less rigorous and stringent. The presumption against demolition should be restricted to listed structures.</p> <p>In so doing, property owners may be encouraged to embrace more environmentally sustainable buildings whose life time energy costs will be far lower than certain existing outworn structures.</p> <p>As noted in the briefing paper other IP Policies sufficiently control the management of demolition, protection of wildlife &amp; safeguarding of Listed Buildings and Places/Conservation Areas.</p>	Comments noted.
IR(1) -162	Chief Executive Ian Taylor	Jersey Chamber of Commerce	Supporting	<p>The removal of this policy is to be encouraged, as it was a difficult policy both to support and on which for the Minister to judge.</p> <p>It was also used by objectors to object to applications, and which, for previous stated reasons, were difficult to defend.</p>	Comments noted.
IR(1) -49	Chris Lamy		Supporting	Basic common sense.	Comments noted.
IR(1) -172	Deputy Sean Power	States Member (St. Brelade No.2); Chairman of the Planning Applications Panel	Supporting	<p>GD2 Demolition and replacement of buildings; there are clear tensions in IP 2011 whereby it has become almost impossible to value judge whether a building should be demolished to make way for a new more energy efficient building.</p> <p>This withdrawal of policy is welcome and should be assessed on an application by application basis.</p>	Comments noted.
IR(1) -32	Mr Michael Stein	MSPlanning Ltd	Supporting	Too subjective.	Comments noted.
IR(1) -139	Mr Michael Stein	MSPlanning Ltd	Supporting	<p>The Minister's proposal to remove Policy GD2 is supported.</p> <p>The Royal Court have interpreted this policy too literally and which has caused the Minister difficulty, especially in the assessment of finely balanced cases and in instances where demolition can assist comprehensive redevelopment resulting in higher yield development thereby securing an overall planning gain.</p> <p>In any event, demolition of major structures is required to have planning consent under the Planning Law, so development control powers are still in place, and therefore, the existing land use and amenity value of the building proposed to be demolished will continue to be material considerations in the determination of any such application.</p>	Comments noted.
IR(1) -130	Mr Paul Harding	BDK Architects	Supporting	<p>We welcome recognition that demolition &amp; replacement can be more sustainable than retaining &amp; refurbishing.</p> <p>As noted in the Briefing Paper other IP Policies control management of demolition, protection of wildlife and safeguarding of Listed Buildings &amp; Places / Conservation Areas.</p>	Comments noted.
IR(1) -23	Mr Peter Thorne		Supporting	This policy has never worked consistently.	Comments noted.
IR(1) -100	Mrs Stephanie Steedman		Supporting	Current policy too prescriptive	Comments noted.

## Proposal 4a: Restrict permitted development rights in the Coastal National Park

The Minister for Planning and Environment will further explore the restriction of permitted development rights in the Coastal National Park in order to better protect its fragile and sensitive landscape character. This will include consultation with stakeholders on any proposed changes to the Planning and Building (General Development) Order.

### Questionnaire consultation results

	% Total	% Answer	Count
<b>Number of responses</b>	25%	-	55
<b>Objecting</b>	5%	18%	10
<b>Supporting</b>	18%	71%	39
<b>Neither</b>	3%	11%	6
<b>[No response]</b>	75%	-	164
<b>Total</b>	<b>100%</b>	<b>100%</b>	<b>219</b>



## Proposal 4a: Restrict permitted development rights in the Coastal National Park - comments

Ref	Name	Agent/ Organisation	Supporting/ Objecting	Reasons for answer	Minister's Response
IR(1) -87	Anonymous		Neither	This proposes nothing more than to consider something, and to consult with some people about the thing that's being considered. It does not offer any protection for those concerned stakeholders, nor does it provide clarity as to what restriction is likely to be in place for those who will wish to build/develop.	The removal of some permitted development rights will require amendment to the Planning and Building (General Development) (Jersey) Order 2011 which will be the subject of separate consultation: the extent of control will be determined through this separate process.
IR(1) -177	Deputy John Le Fondré	States Member (St. Lawrence)	Neither	I am probably broadly supportive, however this needs to be balanced between further protection, and being over zealous - bearing in mind the fact that the national park extends from just by St Aubin all the way around to Grouville.	The removal of some permitted development rights will require amendment to the Planning and Building (General Development) (Jersey) Order 2011 which will be the subject of separate consultation: the extent of control will be determined through this separate process.
IR(1) -69	Anonymous		Objecting	<p>It is acknowledged that all development within the CNP is sensitive, but it is important to balance the desire to protect the CNP against adverse, inappropriate development against stakeholder rights, many of whom have not elected to be in the CNP but have merely been absorbed into it.</p> <p>Since permitted development rights have been extended, there has not been a plethora of unsightly development in the area now zoned as the CNP. It is suggested that the current process of removing these rights upon the submission of an application in this zone might be the more equitable way forward. In so doing property owners are aware that as soon as a formal application is made to the Department of the Environment for a property in the CNP that this may trigger the imposition of restrictions onto property.</p> <p>Full support is offered for many of the tenets contained in this amended Policy document, however there are certain Policy notes which cannot be supported and which are simply non-sustainable or reasonable.</p>	The removal of some permitted development rights will require amendment to the Planning and Building (General Development) (Jersey) Order 2011 which will be the subject of separate consultation: the extent of control will be determined through this separate process.
IR(1) -18	Anonymous		Objecting	This only covers 'exploring' rather than meeting an over-riding principle of 'protecting'. This will be a subjective view and thus needs a more unambiguous approach.	The removal of some permitted development rights is a firm proposal and will require amendment to the Planning and Building (General Development) (Jersey) Order 2011 which will be the subject of separate consultation: the extent of control will be determined through this separate process.
IR(1) -114	Carlo Riva	The Association of Jersey Architects	Objecting	<p>It is acknowledged that all development within the CNP is sensitive, but it is important to balance the desire to protect the CNP against adverse, inappropriate development against stakeholder rights, many of whom have not elected to be in the CNP but have merely been absorbed into it.</p> <p>Since permitted development rights have been extended, there has not been a plethora of unsightly development in the area now zoned as the CNP. It is suggested that the current process of removing these rights upon the submission of an application in this zone might be the more equitable way forward. In so doing property owners are aware that as soon as a formal application is made to the Department of the Environment for a property in the CNP that this may trigger the imposition of restrictions onto a property.</p>	The removal of some permitted development rights will require amendment to the Planning and Building (General Development) (Jersey) Order 2011 which will be the subject of separate consultation: the extent of control will be determined through this separate process.
				Furthermore, it is suggested that once PDR rights are removed from a building within the CNP, that applicants should be exempt from application fees for such structures in the same manner as is applicable for listed buildings.	The proposed exemption from fees is noted. The Minister for Planning and Environment is minded to consider this proposal favourably and would need to address it through amendment of the associated fee schedule.
IR(1) -25	Carlo Riva	Riva Architects Ltd	Objecting	<p>It is acknowledged that all development within the CNP is sensitive, but it is important to balance the desire to protect the CNP against adverse, inappropriate development against stakeholder rights, many of whom have not elected to be in the CNP but have merely been absorbed into it.</p> <p>Since permitted development rights have been extended, there has not been a plethora of unsightly development in the area now zoned as the CNP. In so doing property owners are aware that as soon as a formal application is made to the Department of the Environment for a property in the CNP that this may trigger the</p>	The removal of some permitted development rights will require amendment to the Planning and Building (General Development) (Jersey) Order 2011 which will be the subject of separate consultation: the extent of control will be determined through this separate process.

Ref	Name	Agent/ Organisation	Supporting/ Objecting	Reasons for answer	Minister's Response
				imposition of restrictions onto a property. Full support is offered for many of the tenets contained in this amended Policy document, however there are certain Policy notes which cannot be supported and which are simply non-sustainable or reasonable.	
IR(1) -32	Mr Michael Stein	MSPlanning Ltd	Objecting	It removes rights of householders afforded to those living elsewhere, and the level of development that is permitted under exempted development rights has not caused an issue as far as I know.	It is considered that the sensitivity of the landscape in the CNP warrants a review of the extent of permitted development rights here.
IR(1) -23	Mr Peter Thorne		Objecting	In my view the existing permitted development rights will have no adverse impact on the Coastal National Park	It is considered that the sensitivity of the landscape in the CNP warrants a review of the extent of permitted development rights here.
IR(1) -91	Anonymous		Supporting	but then why has Plémont been given the go-ahead which is at odds with this policy	Support noted. This proposal is not influenced by the decision to award planning permission for the development of the former holiday village at Plémont, which is primarily located in the Green Zone.
IR(1) -70	Anonymous		Supporting	I believe the costal national parks should be protected, as a family we often walk along costal routes which are beautiful	Support noted.
IR(1) -5	Anonymous		Supporting	If we are to have this designation then it ought to be enforced absolutely and it should not be watered down, particularly after such a short space of time since its inception.	Support noted.
IR(1) -81	Anonymous		Supporting	Need to protect the landscape	Support noted.
IR(1) -4	Anonymous		Supporting	we need to preserve out coastal areas	Support noted.
IR(1) -24	Anonymous		Supporting	We need to protect our CNP, fields and green areas	Support noted.
IR(1) -83	Celia Scott-Warren		Supporting	Decisions and developments in recent years have shown scant regard for the special character of Jersey's coastal landscape.	Comments noted.
IR(1) -134	Jeremy Snowden		Supporting	The proposal 4a is to "restrict permitted development rights" whereas the text advises that the Minister will further explore the restriction of permitted development rights". I urge the Minister to actually restrict them. Without restriction developments which undermine the purposes of the CNP will be possible without the Minister being even aware that such developments will be undertaken.	The removal of some permitted development rights will require amendment to the Planning and Building (General Development) (Jersey) Order 2011 which will be the subject of separate consultation: the extent of control will be determined though this separate process. This is not a policy issue and the timescale for its implementation is not appropriately addressed in the Island Plan. The proposal is part of the Department of the Environment Business Plan: amendment of the GDO is being progressed and will be brought forward in 2014.
IR(1) -220	Keith & Sophie Dixon		Supporting	We were gladdened to read (at paragraph 2.110 of the proposed revision) that the Minister intends to limit the extent of permitted development rights. However we note that no timeframe has been mentioned for the consultation process and without a firm deadline we fear that this initiative will almost certainly languish until after the forthcoming elections, if not longer.	The removal of some permitted development rights will require amendment to the Planning and Building (General Development) (Jersey) Order 2011 which will be the subject of separate consultation: the extent of control will be determined though this separate process. This is not a policy issue and the timescale for its implementation is not appropriately addressed in the Island Plan. The proposal is part of the Department of the Environment Business Plan: amendment of the GDO is being progressed and will be brought forward in 2014.
IR(1) -17	Mr John Shenton		Supporting	A consistent more definitive approach would be beneficial	The removal of some permitted development rights will require amendment to the Planning and Building (General Development) (Jersey) Order 2011 which will be the subject of separate consultation: the extent of control will be determined though this separate process. This is not a policy issue and the timescale for its implementation is not appropriately addressed in the Island Plan. The proposal is part of the Department of the Environment Business Plan: amendment of the GDO is being progressed and will be brought forward in 2014.
IR(1) -130	Mr Paul Harding	BKD Architects	Supporting	Supporting Proposal 4a with a modification It is important to protect the special qualities of CNP that all forms of development, even what might be considered minor, are carefully controlled. We would argue Permitted Development Rights (PDR) within CNP should even be totally removed - comparable to the current position for Listed Buildings. However, to balance this with stakeholder rights, such restriction or removal of PDR within CNP should be accompanied with allowing free Planning applications for Applicants within CNP whom	Qualified support noted. The proposed exemption from fees is noted. The Minister for Planning and Environment is minded to consider this proposal favourably and would need to address it through amendment of the associated fee schedule.



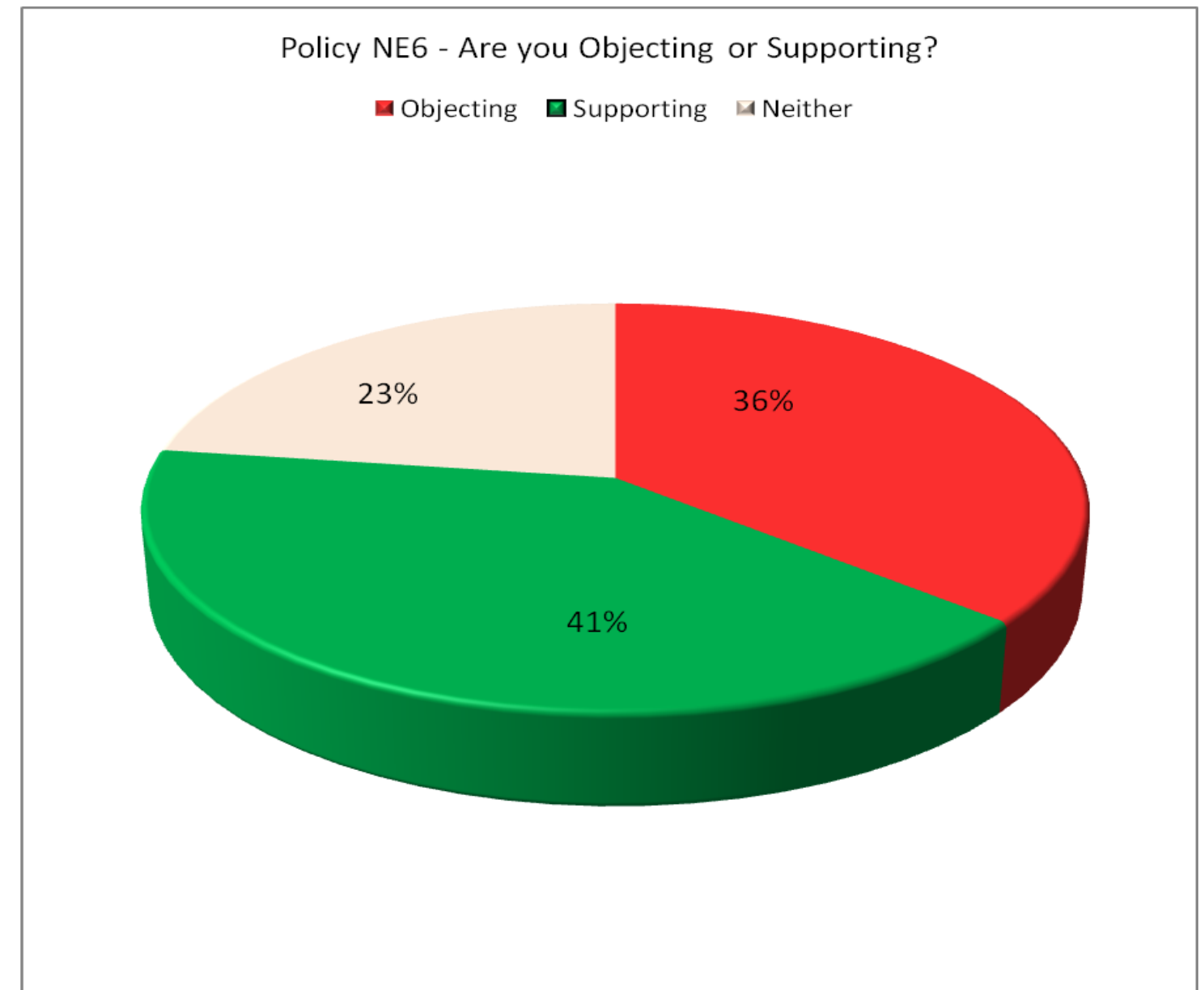
Ref	Name	Agent/ Organisation	Supporting/ Objecting	Reasons for answer	Minister's Response
				(had PDR applied) would not have had to make a formal Planning application. This would be equable and mirror the Listed Buildings. We therefore submit Proposal 4a should be modified to include an undertaking that applications for approval of development within CNP that would otherwise have been permitted under the Planning and Building (General Development) Order will not incur an application fee.	
IR(1) -15	Mrs Rosemary Evans		Supporting	This should afford protection so that the catastrophe of the proposed development at Plémont could never happen again	Support noted. The proposed reduction of permitted development rights has no relevance, however, to the development of the former holiday village at Plémont
IR(1) -100	Mrs Stephanie Steedman		Supporting	Reduces the need to be so prescriptive in Policy NE6 - greater control over potentially harmful minor development	Comments noted.
IR(1) -85	N Melton		Supporting	To stop another 'plemont' happening!	Support noted. The proposed reduction of permitted development rights has no relevance, however, to the development of the former holiday village at Plémont
IR(1) -181	Vivien Vibert			This is misleadingly entitled "Restrict development rights in the coastal national park" when it does exactly the opposite; it limits the level of strong presumption against development to "ancillary buildings" and it makes no reference to the Countryside Character Appraisal. "Swimming pools, driveways and other forms of hard landscaping, accesses, means of enclosure" however well designed should be discouraged in the CNP as they are not suitable for those areas.	Comments noted. The Minister is to publish the Countryside Character Appraisal (CCA) as SPG which can be used to assess the impact of development upon landscape character. Para. 2.46-2.48 and Proposal 4: Coast and countryside character of the 2011 Island Plan already requires that the Minister has regard to the CCA as a material consideration.

## Policy NE6: Coastal National Park

The Minister proposes to amend the Coastal National Park Policy NE6

### Questionnaire consultation results

	% Total	% Answer	Count
<b>Number of responses</b>	30%	-	66
<b>Objecting</b>	11%	36%	24
<b>Supporting</b>	12%	41%	27
<b>Neither</b>	7%	23%	15
<b>[No response]</b>	70%	-	153
<b>Total</b>	<b>100%</b>	<b>100%</b>	<b>219</b>



## Policy NE6: Coastal National Park - comments

Ref	Name	Agent/ Organisation	Supporting/ Objecting	Reasons for answer	Minister's Response
IR(1) -129	Deputy Jeremy Macon	States Member (St. Saviour No.1); Member of the Planning Applications Panel	Objecting	Costal National Park Zone - too restrictive regarding extensions	The cumulative impact of the extension and replacement of dwellings along the coast in particular has lead to increasing concern about the creeping urbanisation and incremental erosion of the Island's landscape character: the proposed amendment seeks to respond to this concern.  The Minister's proposed amendment seeks to introduce some degree of objectivity to the policy whilst still retaining some flexibility to consider the particular circumstances of each case on its individual circumstances and, most importantly, its affect on the landscape character.
IR(1) -6	Anonymous		Neither	I support the Residential element but the employment use is a policy which needs to be removed in its entirety from the Island Plan, another failed attempt at market intervention by people who have NO knowledge of the market and thus counter productive	Support for the residential element of the policy is noted.  The CNP is a working environment and a policy regime is required to deal with the reasonable expectation of economic land uses within it;  It is not clear whether these comments are just related to Policy NE6: Coastal National Park or whether they are directed at Policy E1: Protection of employment land. The Minister for Planning and Environment has agreed to consider whether review of other parts of the 2011 Island Plan require review and amendment in accord with the States approval of P.71/2013 (see: <a href="http://www.statesassembly.gov.je/Pages/Propositions.aspx?documentref=P.71%2f2013.">http://www.statesassembly.gov.je/Pages/Propositions.aspx?documentref=P.71%2f2013.</a> )
IR(1) -83	Celia Scott-Warren		Neither	I am concerned about the proposed revised Policy NE6 and feel I cannot support it at this time.	Noted
IR(1) -177	Deputy John Le Fondré	States Member (St. Lawrence)	Neither	As a principle I accept that the coastal national park should be protected.	Support for the principle of protecting the CNP is noted.
				I have also previously expressed views that I am concerned about the creep of residential development into the area now designated.	Concern about 'residential creep' is also noted.  The existing policy presumes against residential development but the proposed amendment seeks to clarify that the CNP is a living and working environment and that to impose a blanket presumption against all forms of development here is unreasonable. The proposed amendment seeks to identify those exceptions to the presumption against development that may be permissible where it satisfies stated tests.
				However I also caveat that against the fact that a number of tourist facilities are sited in the national park (and indeed I own one of them). It is therefore imperative that where good design, and appropriate development, is sought in the national park, that will assist towards maintaining / enhancing tourism infrastructure and facilities, that the likes of exception 12 above (for example) are positively considered.	The proposed amendment to the policy sets out a framework for the assessment of proposals to maintain and enhance the tourism infrastructure at paras. 2.101 – 2.109 and NE6 (12).  The proposed amendment to the policy also seeks to set out how proposals to extend and/or intensify existing employment uses will be dealt with at paras. 2.76-2.81 and NE6 (7).
IR(1) -172	Deputy Sean Power	States Member (St. Brelade No.2); Chairman of the Planning Applications Panel	Neither	Some applications in the Coastal National Park have been refused because they are simply included in NE6. These applications have had in many cases, some merit but the panel have had to refuse because of their location..	The CNP boundaries have been informed by an objective assessment and definition of the Island's highest value and most sensitive landscapes (see paras 2.56-2.57) and are not part of the Minister's interim review.
				A blanket policy such as this needs to be reviewed and applied on a discretionary basis on a case by case basis	The policy to manage development in the CNP needs to be applied consistently and only where there is sufficient justification to do so, should it be outweighed by other material factors.
IR(1) -173	Mr M Cotillard	Jersey Construction Council	Neither	It is noted that the "highest" level of protection is afforded to the coastal national park areas and a "high" level of protection is afforded to the green zone. These two areas combined cover the vast majority of the Island. Whilst there are provisions in the Policy setting out guidelines for exemptions within these areas, the Jersey Construction Council believes that there are many sites which could be utilised for housing within these areas and is of the belief that the plan as proposed could cause difficulty in providing much needed housing in the future. One such example would be	There is no change to the extent of land covered by the CNP and the GZ and the relative level of protection afforded to each as part of the Minister's proposed revisions.  The presumption against development in these areas remains in the Minister's proposed amendment to policies NE6 and NE7 reflecting the thrust of the current policies NE6 and NE7. The proposed amendments seek to provide a clearer framework for the assessment of potential exceptions for residential development in

Ref	Name	Agent/ Organisation	Supporting/ Objecting	Reasons for answer	Minister's Response
				the potential use of further glasshouse sites or Parish village developments within the green zone.	the CNP at NE6 (1)-(6). The existing Island Plan already provides a planning policy framework for the assessment of proposals to develop glasshouses at Policy ERE7: Derelict and redundant glasshouses and for the provision of Parish village developments at Policy H5: Housing in rural centres.
IR(1) -23	Mr Peter Thorne		Neither	No significant changes	Noted.
IR(1) -85	N Melton		Neither	Unless this will stop the creep of development then it won't work. Include plemont please!	The Minister's proposals seek to restrict permitted development rights in the CNP and to provide a clear, comprehensive and robust framework to regulate future change. A review of CNP boundaries is not part of the Minister's proposed amendments to the 2011 Island Plan.
IR(1) -81	Anonymous		Objecting	A coastal national park is required for a reason so that the landscape and wildlife of the Island are not destroyed. Any development restrictions on the coastal park should not be seen as unreasonable. Restrictions are put in place for a reason.	Noted.
IR(1) -13	Anonymous		Objecting	I do not understand, particularly, Residential, 4 which seems to say that "the following exceptions to the strong presumption against development in the Coastal National Park may be permissible where they do not cause harm to the landscape character of the area...". I simply do not see how an additional "household" (which is a vague and amorphous expression in itself) can be squared when it would invariably require a significant extension to a dwelling or an entirely new one. Either the States wish to protect the CNP and Green Zone or they do not and these continual attempts to nibble away at the protections we all thought were in place does the process no credit whatsoever. The zoning having been established in a 10 year Plan the populace deserve a rest from this continual tinkering!	The proposed amendments to the policy seek to provide the strongest presumption against the development of a separate household in the CNP. NE6(4) is prefaced with the words, "For the avoidance of doubt, there will remain the strongest presumption against...the development of a separate household by; the extension of an existing building; or by the extension of an existing building which, by virtue of its form and layout, is tantamount to and capable of the creation of a separate household; or, the conversion of an ancillary domestic building or part of an existing dwelling". The Minister is proposing amendment to this policy to ensure that it is as clear, robust and comprehensive as it might be.
IR(1) -18	Anonymous		Objecting	Much too flexible and is subjective.	The proposed amendments to the policy seek to provide a much clearer and comprehensive framework with the introduction of some objective parameters of assessment to reduce flexibility and subjectivity when compared to the policy as currently drafted.
IR(1) -69	Anonymous		Objecting	Specifically: "NE6 - Residential 2.a. be no larger, in terms of gross floor space or building footprint, than the building being replaced" This clause is damaging and not viable. It will not encourage the renewal of outworn buildings. There is no recognition in this clause about the economics of redevelopment. Furthermore, it is simply not logical - why can an extension to an existing dwelling be considered acceptable under certain circumstances, when no further floor area can be countenanced when full redevelopment is considered - this just doesn't seem reasonable.	The cumulative impact of the replacement of dwellings with larger modern properties along the coast in particular has led to increasing concern about the creeping urbanisation and incremental erosion of the Island's landscape character: the proposed amendment seeks to respond to this concern. The existing policy regime already requires that replacement dwellings in the CNP deliver demonstrable environmental gain by a reduction in visual mass and thus the proposed introduction of objective parameters related to floorspace and building footprint is considered to be beneficial to the assessment of this. Such a policy tool is not new to Jersey and it reflects the parameters introduced by the St Ouen's Bay Planning Framework (SOBPF) and included in the 2002 Island Plan relating to the Zone of Outstanding Character. This approach is also consistent with that adopted by other planning authorities to manage this form of development in highly sensitive landscapes such as the English and Welsh National Parks.
				"NE6 - Employment 8a & 11b" Object to this clause strongly - reasoning as above.	The same principles set out above apply to the assessment of replacement employment buildings.
				"NE6 - Clause 2.80" This clause requires further clarification possibly. Under certain circumstances would it be possible to construct a smaller detached ancillary structure of equivalent size to a permissible extension, subject to the environmental impact being less than the extension.	The Minister's proposed amendment strongly presumes against the development of ancillary buildings in the CNP: the current policy is silent on this matter (see Hobson vs Minister for Planning and Environment) and the proposed amendment addresses this at NE6 (16).
IR(1) -10	Anonymous		Objecting	There should be no further development of our green areas and coastal development only on a small scale to keep our coast line for all islanders to enjoy.	The Minister's proposed amendment seeks to protect the landscape character of the CNP whilst providing a policy framework to deal with the reasonable expectation of

Ref	Name	Agent/ Organisation	Supporting/ Objecting	Reasons for answer	Minister's Response
					existing residents and business in the CNP.
IR(1) -25	Carlo Riva	Riva Architects Ltd	Objecting	Specifically: "NE6 - Residential 2.a. be no larger, in terms of gross floor space or building footprint, than the building being replaced" This clause is damaging and not viable. It will not encourage the renewal of outworn buildings. There is no recognition in this clause about the economics of redevelopment. Furthermore, it is simply not logical - why can an extension to an existing dwelling be considered acceptable under certain circumstances, when no further floor area can be countenanced when full redevelopment is considered - this just doesn't seem reasonable.	See response to IR(1) - 69
				"NE6 - Employment 8a & 11b" Object to this clause strongly - reasoning as above.	
				"NE6 - Clause 2.80" This clause requires further clarification possibly. Under certain circumstances would it be possible to construct a smaller detached ancillary structure of equivalent size to a permissible extension, subject to the environmental impact being less than the extension.	
IR(1) -114	Carlo Riva	The Association of Jersey Architects	Objecting	Full support is offered for many of the tenets contained in this amended Policy document, however there are certain Policy notes which cannot be supported and which are simply non-sustainable or reasonable. Specifically: "NE6 - Residential 2.a. be no larger, in terms of gross floor space or building footprint, than the building being replaced" This clause is damaging and not viable. It will not encourage the renewal of outworn buildings. There is no recognition in this clause about the economics of redevelopment.  Furthermore, it is simply not logical - why can an extension to an existing dwelling be considered acceptable under certain circumstances, when no further floor area can be countenanced when full redevelopment is considered - this just doesn't seem reasonable.	The cumulative impact of the replacement of dwellings with larger modern properties along the coast in particular has lead to increasing concern about the creeping urbanisation and incremental erosion of the Island's landscape character: the proposed amendment seeks to respond to this concern.  The existing policy regime already requires that replacement dwellings in the CNP deliver demonstrable environmental gain by a reduction in visual mass and thus the proposed introduction of objective parameters related to floorspace and building footprint is considered to be beneficial to the assessment of this.  Such a policy tool is not new to Jersey and it reflects the parameters introduced by the St Ouen's Bay Planning Framework (SOBPF) and included in the 2002 Island Plan relating to the Zone of Outstanding Character. This approach is also consistent with the approach adopted by other planning authorities to manage this form of development in highly sensitive landscapes such as the English and Welsh National Parks.
				"NE6 - Employment 8a & 11b" Object to this clause strongly - reasoning as above.	The same principles set out above apply to the assessment of replacement employment buildings.
				"NE6 - Clause 2.80" This clause requires further clarification possibly. Under certain circumstances it should be possible to construct a smaller detached ancillary structure of equivalent size to a permissible extension, subject to the environmental impact being less than the extension.	The Minister's proposed amendment strongly presumes against the development of ancillary buildings in the CNP: the current policy is silent on this matter (see Hobson vs Minister for Planning and Environment) and the proposed amendment addresses this at NE6 (16).
				We note that in May 2012, the consultation draft SPG on Policy application: NE6 Coastal National Park in paragraph 6.3.11 acknowledged this fact:- " The Minister does not consider it appropriate to set out any general guidelines about the size of any new dwelling relative to that which existed previously: the key determinant will be the impact of redevelopment on the landscape character of the area. This relates to the design of the building and, in particular, its siting, use of materials, colour and form (it may even be that an increase in the scale of a building may improve its appearance in the landscape). "  Considering this explicit acceptance that guidelines about the size of any new dwelling would be inappropriate and that they key determinant is " impact of redevelopment on the landscape character of the area " we find it irrational less than 18 months later the Interim Review proposes exactly the opposite.	The Minister has sought to respond to the issues raised during consultation on draft guidance relating to the CNP as set out in the briefing paper (July 2013).



Ref	Name	Agent/ Organisation	Supporting/ Objecting	Reasons for answer	Minister's Response
				We recommend that serious consideration should be given to the requirement to prepare 'Landscape and Character Assessments' as part of an application in the CNP to demonstrate that no adverse harm is represented by the application to the character or landscape of the area.	Design statements, under the auspices of SPG issued in December 2006, are already required to set out: 1. how development will...complement the character of the area; 3. a detailed landscape and visual impact assessment. This SPG reflects the policy regime of the 2002 Island Plan. The Minister will review and update it to reflect the 2011 Island Plan policy regime and to consider the extension of the requirement for design statements to be provided for applications in the CNP and GZ.
IR(1) -162	Ian Taylor	Jersey Chamber of Commerce	Objecting	The(se) policy/ies appear to have become much more negative. The Green Zone makes up about 85% (and Coastal National Park 10%) of land area, this is of extreme concern. Potentially damaging to householders as this will affect what can be achieved through extensions, or replacement homes and will greatly reduce work for the construction industry, including architects, engineers, QSs', and all contractors. This policy has the potential to be extremely damaging. The impact will be particularly felt by smaller local independent builders, especially those with specialist restoration and repair skills, which are already in short supply on the island.	There is no change to the extent of land covered by the CNP and the GZ and the relative level of protection afforded to each as part of the Minister's proposed revisions. The proposed amendments seek to provide greater clarity to potentially permissible exceptions that respond to the reasonable expectations of residents and business in the CNP and GZ. Restoration and repair is not precluded by the Minister's proposed amendment so any adverse impact on specialist construction skills is considered to be unfounded.
				The policy will discourage "high net worth" immigrants as it will be difficult to source properties that will fulfil their expectations. This class of resident contribute a significant amount of work to the construction sector, especially during the recession. A further consequence is to make Jersey less competitive than other jurisdictions (e.g. Guernsey) in employing highly skilled employees for the finance and other industries. The planners wish to establish a figure against which to judge applications, but have chosen a 0% increase for replacement buildings. In establishing this, realistically this should be a 50% increase, otherwise, why would homeowners or prospective purchasers seek to redevelop existing houses? This policy will result in existing large houses becoming more expensive and smaller houses losing value because of the inability to extend them significantly or replace them with anything larger. This policy change has therefore unintended implications and will further depress an already stagnant housing market.	The Minister does not accept the argument that the proposed change to the policy will adversely affect Jersey's attractiveness to high net worth individuals. The proposed amendment to the policy seeks to better protect and enhance the quality of the Island's most valuable and attractive landscapes: these landscapes are part of the appeal and benefit of living in Jersey. No evidence is provided to support the contention that there is limited choice at the high value end of the Island's housing market which would render Jersey uncompetitive in securing key workers. The availability of a range of residential accommodation at a range of prices in the CNP promotes greater opportunity to access housing here.
IR(1) -134	Jeremy Snowden		Objecting	Paragraph 2.59 is ambiguous: The purpose of planning policy in the Coastal National Park is to provide the highest level of protection against development in support of the objectives of the park I can interpret this as providing protection against development which is in support of the objectives of the park. I assume not the intention.	Noted. The Minister is minded to amend the sentence to replace 'in support' with 'to support'.
				There is a clear and concise paragraph (2.64) in the 2011 Island Plan, as adopted: These areas contained within the Coastal National Park are accorded the highest level of protection in the Countryside Character Appraisal, which will take priority over all other planning considerations. Accordingly there will be the strongest possible presumption against all forms of new development and the extension and/or intensification of existing development. It is unfortunate that this has been dropped from the proposed revision. The proposed revision would benefit from its retention, possibly as a substitute for the proposed paragraph 2.59 (possibly without the "new"!)	The proposed amendment clearly states that to prevent all development in the CNP is unreasonable and seeks to clarify those circumstances where development of existing buildings and land uses in the CNP may be permissible. The Minister is not minded to amend his proposal.
				Paragraph 2.60. The two instances of "presumption" in this paragraph are weak presumptions and not the "strongest presumption" which is used in the policy NE6's second sentence (page 86). For consistency these should be the same as the policy itself. There are many subsequent instances of various types of "presumption" such as "general presumption" (2.62) which would benefit with being aligned to the policy itself.	Noted. The Minister is minded to review the pre-amble to ensure consistency with the policy.

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				Paragraph 2.61: There is also a need to provide for the reasonable expectation of residents of the Coastal National Park to improve their homes and for business to undertake economic activity and to provide employment in the park, having regard to the capacity of the landscape to accommodate development without harm. "Reasonable expectations" What is reasonable to one may not be to another; history is likely to inform and to-date "improvements" have seen properties more than doubled in size and the blight of intrusions into the National Park increased.	The scale of reasonable expectation is considered to be clearly set out in the pre- amble and the proposed revision to the policy itself.
				Surely accommodating businesses' developments and employment in the park must be restricted to those businesses whose activities support the purposes of the park, as expressed in paragraph 2.58? Otherwise any industrial business would be able to employ this exception to construct new factories.	The CNP is a living landscape and is a product of human intervention and natural influences. Existing employment uses here contribute to the rural and island economy and the Minister's proposed amendment to the policy seeks to acknowledge their presence and role in the Park whilst providing a framework to assess and manage change. The policy clearly presumes against new factories (see paras 2.74-2.100, and specifically para 2.80 and NE6 (7)-(11) and (16)).
				Paragraph 2.62. The phrase " but there may be cases where development will be unacceptable. " is very weak and implies that the norm is for development proposals to be acceptable. Perhaps this phrase could be deleted. There are many subsequent instances of "may be cases" such as paragraph 2.64 which also allude to permitting development is the norm.	The purpose of these phrases is to reinforce the point that potential exceptions to the strong presumption against development are not the norm and that there will be cases where exceptions will not be permissible.
				Paragraph 2.66. " should remain subservient to the existing dwelling " and " not disproportionately increase the size in terms of its gross floorspace or building footprint" are both vague terms and no-doubt would be interpreted in very different ways by various interested parties. Furthermore as written this clause would permit serial extensions to vastly increase the size over successive developments. I strongly urge that consideration be made to limiting the increase in size to a percentage of the size of the dwelling as first constructed as is the case in some U.K. national parks (e.g. 20% in the case of Brecon Beacons National Park). There are many subsequent instances of the " subservient " such as paragraph 2.79. Furthermore " gross floorspace or building footprint" is satisfied if either of these conditions is met. I assume that the intention is that both conditions have to be met (an additional storey does not increase building footprint). There are many subsequent instances of this same wording, such as in paragraph 2.70. "and" would resolve these.	The Minister's proposed amendment seeks to introduce some degree of objectivity to the policy whilst still retaining some flexibility to consider the particular circumstances of each case on its individual circumstances and, most importantly, its affect on the landscape character. The planning history of a site will be material consideration to the assessment of proposals for further extensions. The Minister is, however, minded to further consider reference to 'the original dwelling' in the policy in order to clarify this. The intention of the Minister's proposed amendment is to ensure that either an extension which increases the gross floorspace or the building footprint is not disproportionate to the existing building. In other words, the test should apply to the proposed extension of a building whether by the addition of an additional storey <u>or</u> by an increase in the size of the building's footprint. Both conditions do not have to be met for the test to apply.
				Paragraph 2.67. " The purpose and function of an extension to a dwelling will be a material consideration and should not lead to a significant increase in the occupancy of the dwelling. " I assume that the intention is that the number of occupants will be the factor here but it also encompasses an increase in time of occupation such as a study permitting work at home. "Significant" means very different things to different people. I suggest that it would not be too unreasonable to residents to permit no increase leading from an extension.	The Minister does not consider it reasonable to allow no increase in the number of people occupying a dwelling as a result of an extension and is not minded to amend the draft proposals.
				Paragraph 2.72. " with potentially serious implications for harm to the landscape character of the area ". Surely " serious " should not be a qualifier to the potential for harm?	?
				Paragraph 2.76. " why a coastal or countryside location is required for development in the Coastal National Park ". Surely all locations in the Coastal National Park are either coastal or countryside? The wording in paragraph 2.85 is clearer; perhaps the " in the Coastal National Park" could be deleted?	Noted. The Minister is minded to make a minor amendment.
				Paragraph 2.77. " potential impact on the landscape character of the immediate area ". Including " immediate " will lead to different interpretations, perhaps this word could be deleted?	Noted. The Minister is minded to make a minor amendment.
				Paragraph 2.83. " positively enhance ". Tautological.	Noted. The Minister is minded to make a minor amendment.

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				Paragraph 2.97. " significant environmental gains including some or all of;" " significant " is vague in a requirement. Should not the "some of" be deleted? Otherwise "sensitive use of materials" and "sensitive siting" are all that is required and these are a given form all architects.	The Minister is not minded to amend the draft proposals as all of these potential environmental gains may not be relevant or apply to all cases of development in the CNP. Each case remains to be assessed on their individual circumstances and regard had to the range of potential gains that might be delivered.
				Paragraph 2.99. "new use would not detract from the character of the Coastal National Park" Might this be amended such that any new use would have to support the purposes of the Coastal national Park as expressed in paragraph 2.58?	The test for a change of use are set out at NE6 (9) a.-d. The Minister is minded to delete the words 'but only where any new use would not detract from the character of the CNP.' in para. 2.99 to ensure that undue prominence is not given to one of the policy tests set out at NE6 (9).
IR(1) -220	Keith & Sophie Dixon		Objecting	<p>The Minister's proposals fail to create any sort of meaningful, tangible distinction between the CNP and the Green Zone in our view. A clear divide between these two planning areas is of vital importance primarily because members of the public will simply not cherish and respect the CNP if they do not understand what the concept of a national park means in day to-day terms and see the relevant policies rigorously and consistently applied.</p> <p>We fear that the Minister, by putting forward his proposals, has lost sight of the original vision for the CNP and, whether intentionally or not, will water down the Policy NE6, primarily by the replacement of objective terms with subjective language, so that the CNP will become nothing more than an extension of the Green Zone (albeit with few sundry planning "knobs and whistles" which have little or no effect in controlling development in real terms).</p>	<p>Noted. The concept of the CNP will not just be manifest in the application of planning policy but also in, for example, the development of management plan.</p> <p>Work to arrange the preparation of a CNP management plan is underway in the Department of the Environment and will engage key stakeholders in 2014.</p>
				The slow degradation of the integrity of CNP by the Minister, whether openly or, more covertly through the artful use of language, would a great shame. The original concept was widely supported when it was first mooted in 2009 and the CNP could still become a real source of pride for Islanders in the future. Lack of any genuinely objective measures.	The Minister's proposed amendment to the planning policy for the CNP seeks to maintain and enhance the integrity of the park.
				<p>The Minister, referring to the rationale for the Proposed Revision, says repeatedly in his Briefing Paper that "the proposed amendment seeks to re-introduce some objective parameters of assessment". To our mind, this assertion is a gross misrepresentation of the true position because the vast majority of the new language in the revised Policies NE6 and NE7 is subjective.</p> <p>We accept that all planning policies must necessarily contain some subjective language but for the Minister to justify changes to key planning policies by seemingly passing off subjective parameters of assessment as objective ones is wholly unacceptable in our view.</p> <p>This point can be easily demonstrated by reference to paragraph I.d of Policy NE6 (as proposed) which states "[the extension of a dwelling] would not lead to a significant increase in the occupancy of the dwelling". The words "an increase" by themselves would be clearly objective: it would be a matter of objective fact whether a particular development would cause the number of potential occupants of a dwelling to increase, to stay the same or to decrease. The inclusion of the adjective "significant" in policy I.d. however makes this particular parameter of assessment subjective as each decision maker will have his or her own view as to whether any increase is significant or not. The same analysis applies to the adverb "disproportionately" and the adjective "harm" in clauses I.c and I.e respectively of the Policy NE6 (as proposed).</p> <p>We would argue that genuinely objective measures are vital to the future success of the CNP. This was first realised several years ago by the farsighted authors of the St Ouen's Bay Planning Framework (the "SOBPF" the document which applied to most of the land which now forms the CNP between 1999 and 29 June 2011. They specifically noted that the previous policy (Proposition 24/78) had largely failed in its application because it had lacked "robust, clear and defensible control policies and standards" , that is to say, objective terms.</p>	<p>The Minister's proposed amendment seeks to introduce some degree of objectivity to the policy whilst still retaining some flexibility to consider the particular circumstances of each case on its individual circumstances and, most importantly, its affect on the landscape character.</p> <p>The Minister's proposed amendment builds upon the evolution of planning policy for the Island's special places, such as St Ouen's Bay as set out in the St Ouen Bay Planning Framework (SOBF) and the 2002 Island Plan, and re-introduces broadly similar objective parameters of assessment (see SOBPF Policy SO15: Extensions and alterations to dwelling and SO16: Replacement buildings and 2002 Island Plan Policy C4: Zone of Outstanding Character)</p>

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				<p>The Minister's proposed use of the words "harm" (for the CNP) and "serious harm" (for the Green Zone) is a good example of the way in which in the Proposed Revision places too much weight on an amendment which will ultimately do very little to differentiate the two zones in practice. The proposed change from the test of "serious harm" to "harm" for the CNP was included, we feel, in order to deflect attention away from the removal of important objective restrictions elsewhere in Policy NE6. Indeed we would respectfully ask the Minister, given that he is proposing this change, to draw up a list of those developments in the CNP (which have received planning permission on or after 29 June 2011) which he considers cause harm, but not serious harm, to the CNP. If he is unable or unwilling to do so then we would regard his reticence as his acceptance of our assertion that this (supposedly significant) change will not stem the tide of development in the CNP in any meaningful way.</p>	<p>The Minister's proposed amendment seeks to introduce some degree of objectivity to the policy whilst still retaining some flexibility to consider the particular circumstances of each case on its individual circumstances and, most importantly, its affect on the landscape character.</p>
				<p>We were dismayed to note that several of the key features which distinguish the CNP from the Green Zone have been quietly removed in the proposed policies NE6 and NE7. The first such feature to go under the Minister's proposal is the clear and express prohibition on new households in the CNP which appeared in the draft SPG circulated in May 2012. Its unheralded deletion represents a retrograde step by the Minister in our view. The replacement words "[new households] will be strongly resisted" which now appear at paragraph 2.71 of the Proposed Revision simply do not go far enough.</p> <p>If recent history has shown us anything it is that the Minister, the Planning Applications Panel and the planning officers have all proved themselves unable to resist (whether strongly or otherwise) most things for very long. In this respect we refer to you the decisions made by each of them respectively in cases P/2010/1064 (Le Vouest) P/2012/0724 (La Retraite) and P/2012/1191 (Belle Vue) all of which sanctioned the creation of new units of accommodation in the CNP at a time when such developments were supposedly prohibited.</p> <p>We would respectfully ask for this prohibition to be reinstated or, if this is just too politically sensitive for the Minister to contemplate, for the replacement of the words "will be strongly resisted" in paragraph 2.71 with the words "will not be permitted save in the most exceptional circumstances."</p>	<p>The proposed amendment, as set out at NE6 (3) and (4), together with the pre-ambles at para 2.71 – 2.72 is considered to clearly set out the strongest presumption against the creation of a separate household in the CNP.</p> <p>The Minister is not minded to amend his proposal.</p>
				<p>Another one of the features which currently differentiates the CNP from the Green Zone is the sentence "The [Minister] recognises that there are existing buildings and land uses within the {CNP} and there will be a strong presumption against their redevelopment for other uses; their extension; and the intensification of their use." which appears in Policy NE6 as it is presently drafted.</p> <p>We noted that it too has been deleted from the text of Policy NE6 (as proposed) without any explanation. This policy statement helps to create a break between the two zones and so we would respectfully ask that it be retained.</p>	<p>The proposed amendment clearly states that to prevent all development in the CNP is unreasonable and seeks to clarify those circumstances where development of existing buildings and land uses in the CNP may be permissible.</p> <p>The Minister is not minded to amend his proposal.</p>



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				<p>The sole, genuinely objective measure in the proposed policies appears at clauses 2.a., 8.a and 11a of Policy NE6 (as proposed)("[any redevelopment should} be no larger, in terms of gross floorspace or building footprint, that the building being replaced" ) but even that parameter of assessment has its limitations. The obvious flaw is that the term "the building being replaced" is not defined and so could be construed to include the building in its current form taken together with any actual and/or potential permitted increase in its size.</p> <p>It follows that there is nothing in the revised policy to prevent a developer from circumventing this objective measure by first extending an existing building (whether under the permitted development rights or by means of a planning application) and then and secondly, having increased the gross footprint of the existing building to its maximum amount possible, submitting an application to redevelop it completely. In theory this process of extension and subsequent redevelopment could be repeated more than once. For this reason the guidance should make it clear that the words "the building being replaced" do not include any increase in size which is actually or potentially permitted after the introduction of the Proposed Revision.</p>	<p>Reference to NE6 (11) a. is presumed to be a proofreading error.</p> <p>The planning history of a site will be material consideration to the assessment of proposals for further extensions and replacement. The Minister is, however, minded to further consider reference to 'the original dwelling' in the policy in order to clarify this.</p>
				<p>To conclude, whilst the proposed revision of Policies NE6 and NE7 contain some helpful guidance, it also contains a considerable amount of back-peddalling on the Minister's part.</p> <p>We sense that the Minister has succumbed to political pressure in a number of key areas, in particularly his abandonment of the express prohibition against the creation of new households in the CNP which once formed the cornerstone of the draft supplemental guidance circulated in May 2012 but which has now been subsumed under the overriding "strong presumption against" test, thereby robbing it of its objective force and certainty.</p> <p>Our overall impression is that Policy NE6 (under the Proposed Revision) resembles a looser, much more subjective version of the SOBPF.</p> <p>We would argue that the Minister's proposals go backwards in planning terms and still fail to implement in his original stated aims and objectives for the CNP, that is to say to "maintain and enhance the levels of protection" therein (see P.48/2011(Island Plan: Approval) and Hansard, 21June 2011).</p> <p>We would therefore respectfully urge the Minister to revisit his Proposed Revision and to revise Policy NE6 in a manner which includes genuinely objective terms and control</p>	<p>Comments noted.</p> <p>The proposed amendment, as set out at NE6 (3) and (4), together with the pre-amble at para 2.71 – 2.72 is considered to clearly set out the strongest presumption against the creation of a separate household in the CNP.</p> <p>The Minister's proposed amendment builds upon the evolution of planning policy for the Island's special places, such as St Ouen's Bay as set out in the St Ouen Bay Planning Framework (SOBF) and the 2002 Island Plan, and re-introduces broadly similar objective parameters of assessment (see SOBPF Policy SO15: Extensions and alterations to dwelling and SO16: Replacement buildings and 2002 Island Plan Policy C4: Zone of Outstanding Character).</p> <p>The Minister's proposed amendment seeks to introduce some degree of objectivity to the policy whilst still retaining some flexibility to consider the particular circumstances of each case on its individual circumstances and, most importantly, its affect on the landscape character.</p> <p>The Minister is not minded to amend his proposal.</p>
IR(1) -5	L & M Howard		Objecting	I am against the dilution of the designation after such a short time since its inception.	The proposed changes seek to ensure that the policy is clearer, more comprehensive and more robust.
IR(1) -160	Mr Howard Snowden	Jersey Water	Objecting	<p>It is contended that the La Rosière desalination plant is of strategic importance to the Island's infrastructure and, as an integral part of the current and future public water supply and the only such facility in the Island, should be recognised within the Interim Island Plan as a significant material consideration when balancing the aims of maintaining and enhancing this part of the Coastal National Park.</p> <p>The desalination plant is the only existing alternative means by which the Island can replenish its water resources during times of prolonged drought. The plant produces approximately 6Ml/day (just under one third of the daily demand for water) and is kept as a standby plant in the event that the Island's reservoirs (which hold only approximately 120 days useable supply) are insufficient to meet demand.</p> <p>There are precedents for this approach within the Island Plan and Policy NE6, specifically policies NR4-6 and MR3; and the Minister's recognition of Val de la Mare Reservoir as having similar strategic importance leading to its welcome inclusion in the proposed amendment to policies NE6 and NR9 and their pre-amble. Therefore, recognising within the Interim Island Plan the importance of the desalination plant's potential future extension, replacement or renewal would enable the Minister for Planning and Environment to make legitimate and proper provision for an exception to Policy NE6 in this respect, rather than any future application being constrained by the strongest presumption against development.</p>	<p>It is considered that Policy NE6, as already drafted, allows for the consideration of new or extended utilities infrastructure of strategic importance within the CNP which could include La Rosière desalination plant. No amendment to the policy is, therefore, considered necessary.</p> <p>For the avoidance of doubt as to the status of the desalination plant as an element of strategic infrastructure that might require enhancement and/or renewal during the Plan period, the Minister is minded to give consideration to the addition of a specific reference to 'the extension, replacement or renewal of La Rosière desalination plant' to the last line of para. 2.113 in the pre-amble to Policy NE6.</p> <p>Similarly, no change to Policy NR9 is considered necessary but the Minister is minded to give consideration to the addition of a useful clarification to para. 9.72 in the pre-amble to it through the addition of the following line to that paragraph: 'Similar considerations would apply to any proposals to extend, replace or renew the La Rosière desalination plant in the CNP'.</p>



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				<p>Reliance on Policy NR9 (Utilities infrastructure facilities) alone is not considered to be sufficient and provision should therefore be made within amended Policy NE6 and Policy NR9.</p> <p>The request is to include La Rosière Desalination Plant within the list of strategic development that may be considered within the framework of the Coastal National Park.</p>	
IR(1) -189	Mr John Mesch	Council for the Protection of Jersey's Heritage	Objecting	<p>There is too much duplication and repetition, both between the paragraphs in preamble to the statements of policy and the policy statements themselves. Complete re-drafting is required to provide clarity of purpose. These policies should be justified as necessary for safeguarding the Green Zone and the Coastal National Park from encroachment by new development into countryside and coastal areas which need to be protected as important cultural heritage.</p>	<p>The policies and the pre-amble to them have been broken down to deal with specific forms of development that might be permissible in the CNP and GZ in an attempt to clearly explain the policy framework that will be applied to a comprehensive range of development types: hence the repetitious nature of the policy. A more concise policy could be adopted but this, it is considered, would lack the necessary clarity and specificity.</p>
				<p>Much of the repetitious mention of 'landscape' and 'landscape character' in the proposed revision would be covered concisely by the inclusion of the suggested additional policy on landscape protection. A proposed draft of a policy on landscape protection is provided below.</p> <p><b>Policy on Landscape Protection</b></p> <p>The Island of Jersey is characterised by its distinctive, scenic and historic landscapes and surrounding seascapes.</p> <p>Landscape is important, not just as scenery but because it links culture and nature, the past with the present. It has many values, not all of them tangible, such as the sense of place which is so important in Jersey; and it matters to people – it is the people of Jersey who have helped create and now value their existing landscapes whether urban, rural or coastal.</p> <p>All landscapes matter as they represent a coming together of the natural world and human society. As well as providing places for people to live and work with sources of food and water they also contribute to spiritual fulfilment and aesthetic enjoyment. It is important, therefore, that landscapes should be managed, planned and, where appropriate, protected to ensure that their essential character and the biological diversity they contain is not lost due to excessive or inappropriate development or physical alteration.</p> <p><b>Policy</b></p> <p>The first consideration in any consideration in any planning application will be the effect the proposed development would have on the existing landscape or seascape. Development proposals that would have a significant and detrimental effect upon the visual appearance of the existing landscape or seascape or the biological diversity within the landscape or seascape will not be permitted unless it can be demonstrated that the development is required to meet an essential need of the Island community at large and that the proposed development cannot be located elsewhere.</p>	<p>The Minister is not minded to replace Policy NE6 and NE7 with the proposed policy on landscape protection on the basis that it is inflexible and fails to meet the reasonable expectation of those who live and work in the countryside and along the coast.</p>
IR(1) -32	Mr Michael Stein	MS Planning Ltd	Objecting	<p>Proposals are too onerous and preventing householders to extend or redevelop their homes to meet modern living expectations</p>	<p>See response to IR(1) – 139</p>

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IR(1) -139	Mr Michael Stein	MSPlanning Ltd	Objecting	<p>I have serious misgivings as to the extent of new constraints sought to be applied to the Coastal National Park and Green Zone policies as described in the Interim Review. These changes are now unnecessary.</p> <p>Having met with the Assistant Director of Policy &amp; Projects at a Chamber of Commerce meeting in August 2013, we were advised that the Royal Court were arriving at very different views to the Minister insofar as development in the Coastal National Park and Green Zone is concerned, and which caused the Minister to lose a number of appeals, with substantial costs sometimes being awarded against him.</p> <p>The Royal Court's judges and Jurats, (who are non-experts) have difficulty interpreting these policies, as there is no prescriptive guidance as to what is acceptable and what is not acceptable. This level of guidance, they feel, would make decisions easier and more consistent. Indeed, the 1987 island Plan included the 10% rule.</p> <p>This therefore explains the reasons these policies, as proposed in the Interim Review, have been altered to require extensions to be subservient to the existing building and for replacement dwellings to be no larger than existing. This is simply making the policy too prescriptive and indiscriminate.</p> <p>Were this appeal system to prevail, I would have sympathy with the Minister wanting to alter these policies, as proposed, as it sounds as though he has unfairly been exposed to costs being awarded against him by the Court. However, this appeal system is about to come to an end and a new, merits based and independent appeals system is to be introduced and which should be operational within 12 months. Appeals will therefore be determined by a planning expert in the form of an Inspector and who will have regard to the merits of the proposal rather than to any overly prescriptive guidance which can be unnecessarily prohibitive, when good design or suitable landscaping can overcome any issues of landscape impact. It is therefore recommended that the policy as presently written in the Island Plan 2011 is perfectly acceptable as it gives the planners and the Planning Applications Panel suitable discretion to make perfectly adequate decisions on the merits of the case and which can be properly regulated, if necessary, by the Inspector at the improved appeal system, especially as it is open to 3<sup>rd</sup> parties to appeal the grant of planning permission.</p>	<p>The process of dealing with planning application appeals in Jersey is not material to any proposed amendment of Island Plan policy and neither is the award of costs in recent appeals: the purpose of the proposed amendment is to promote clarity, comprehensiveness and consistency in decision-making. Policies thus need to be clear, accessible and capable of use by all decision-makers, whether expert or not.</p> <p>The Minister does not accept that the proposals represent an excessive level of constraint or are too prescriptive. The current policy has no objective parameters of assessment and the Minister has sought to respond to issues raised by a range of stakeholders about the efficacy of the policy, as evidenced in the consultation feedback on draft SPG (see briefing paper: July 2013).</p> <p>The Minister's proposed amendment seeks to introduce some degree of objectivity to the policy whilst still retaining some flexibility to consider the particular circumstances of each case on its individual circumstances and, most importantly, its affect on the landscape character.</p>
				<p>Otherwise, this excessive level of constraint is going to be very disappointing to householders who, increasingly, have bolder expectations in terms of floorspace for live-in kitchens, media rooms and, generally, larger living rooms and bedrooms, as evidenced by the Minister's own increase in floorspace standards for new houses (by 10%).</p>	<p>The reasonable expectations of householders living in the CNP, in terms of the potential to increase the size of their homes, needs to be balanced against the need to protect the landscape character they have chosen and have the opportunity to live in and enjoy. It is relevant to note that there is support for the introduction of more definitive objective parameters of assessment in the CNP from residents of the CNP, amongst others.</p> <p>Where existing homes in the CNP fail to meet the Minister's <i>minimum</i> housing standards Policy H6 and the requirement to upgrade the accommodation to meet <i>minimum</i> standards will remain a material consideration.</p>
				<p>Equally, it is going to make the island uncompetitive in terms of securing highly skilled finance employees if the opportunities for them to extend and/or redevelop existing houses is too onerous. These employees will be likely to relocate to Guernsey or other more advantageous jurisdictions where better housing opportunities exist. Similarly, it will deter high value residents from choosing the island to relocate to if they are unable to create substantial residences for themselves. These residents will simply elect to move to other low tax destinations.</p> <p>The extent to which these residents have provided a significant source of employment for the construction industry should not be underestimated. Indeed it has almost been the only source of employment to this industry during this prolonged economic recession, and it creates a whole host of other employment opportunities for islanders (ie personal assistants, housekeeping, gardening etc). It is therefore contended that these policies are unnecessarily overly- prescriptive and counterproductive to the aspirations of local residents, essential employees and high value residents, adversely affecting the local economy - when adequate new controls are in place to ensure</p>	<p>The Minister does not accept the argument that the proposed change to the policy will adversely affect Jersey's attractiveness to high net worth individuals. The proposed amendment to the policy seeks to better protect and enhance the quality of the Island's most valuable and attractive landscapes: these landscapes are part of the appeal and benefit of living in Jersey.</p> <p>No evidence is provided to support the contention that there is limited choice at the high value end of the Island's housing market.</p> <p>The proposed change to the policy makes it explicit that to preclude all forms of development in the CNP is unreasonable and in this respect the Minister does not accept that it is detrimental to the construction industry such that the potential for the development of existing land uses and buildings in the CNP is clarified.</p>

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				proper checks and balances for new development in these countryside locations.	
				The upshot of these policies, if approved by the States, would be the unintended consequence of larger houses becoming more expensive, as this resource diminishes over time, whereas smaller houses, unable to be increased in size to any great extent, will lose value because of this level of constraint.	The availability of a range of residential accommodation at a range of prices in the CNP promotes greater opportunity to access housing here.
IR(1) -130	Mr Paul Harding	BDK Architects	Objecting	<p>Strongly Objecting to proposed amendments imposing specific restrictions on 'size', 'footprint' &amp; 'floorspace' (Policy amendments numbered 1(c) &amp; 2(a)):-</p> <p>We fully support the objectives of Policy NE6 as currently written in the 2011 Island Plan and objective to protect the special qualities of this area. Unfortunately the proposed amendments invoking absolute parameters about 'size', 'footprint' &amp; 'floorspace' overlooks in some cases even a marginal size increase can be unacceptable and damaging to the surrounding landscape and character of the area, while in other cases a substantial increase in size can be perfectly acceptable and even enhance CNP qualities. The suggested absolute criteria misunderstands that protecting CNP's special qualities can be achieved by one rule for all, whereas in this zone it is even more important each case is considered on its merits. Indeed the May 2012 consultation draft SPG on Policy application: NE6 Coastal National Park in paragraph 6.3.11 acknowledged this fact:- " The Minister does not consider it appropriate to set out any general guidelines about the size of any new dwelling relative to that which existed previously: the key determinant will be the impact of redevelopment on the landscape character of the area. This relates to the design of the building and, in particular, its siting, use of materials, colour and form (it may even be that an increase in the scale of a building may improve its appearance in the landscape). "</p> <p>Considering this explicit acceptance that guidelines about the size of any new dwelling would be inappropriate and that they key determinant is " impact of redevelopment on the landscape character of the area " we find it irrational less than 18 months later the Interim Review proposes exactly the opposite. Paragraph 2.58 of the 2011 Island Plan: Interim Review consultation draft reiterates the two primary purposes ascribed to the Coastal National Park are:- 1. the conservation and enhancement of the natural beauty, wildlife and cultural heritage of the National Park; 2. to promote opportunities for the understanding and enjoyment of the special qualities of the National Park by the public. As far as we concerned Policy NE6 as currently written in the 2011 Island Plan is perfectly acceptable and gives Planning the tools to consider each case on its Merits, with discretion for sensitive and appropriately designed extensions &amp; replacement dwellings remaining the you as the Planning Minister or as delegated to the Planning Panel / Senior Officers.</p> <p>In our opinion two most important and fundamental considerations are 1) Protecting and enhancing CNP's Landscape Character ; and 2) Appropriate Design relative to existing buildings and their context. This is supported by the 2011 Island Plan and draft SPG.</p>	<p>The cumulative impact of the replacement of dwellings with larger modern properties along the coast in particular has lead to increasing concern about the creeping urbanisation and incremental erosion of the Island's landscape character: the proposed amendment seeks to respond to this concern.</p> <p>The existing policy regime already requires that replacement dwellings in the CNP deliver demonstrable environmental gain by a reduction in visual mass and thus the proposed introduction of objective parameters related to floorspace and building footprint is considered to be beneficial to the assessment of this.</p> <p>Such a policy tool is not new to Jersey and it reflects the parameters introduced by the St Ouen's Bay Planning Framework (SOBPF) and included in the 2002 Island Plan relating to the Zone of Outstanding Character. This approach is also consistent with the approach adopted by other planning authorities to manage this form of development in highly sensitive landscapes such as the English and Welsh National Parks.</p> <p>The Minister's proposed amendment seeks to introduce some degree of objectivity to the policy whilst still retaining some flexibility to consider the particular circumstances of each case on its individual circumstances and, most importantly, its affect on the landscape character.</p>
				<p>Should introduction of an absolute method to determine acceptability of a proposal is considered essential there is a far more appropriate and suitable method already available. The Landscape Institute publish guidance for undertaking objective " Landscape and Character Assessments " ["Guidelines for Landscape &amp; Visual Impact Assessment" 3 rd Edition published by The Landscape Institute and the Institute for Environmental Assessment and Management.] providing a method for establishing the impact of any proposal. We suggest this should be made a requirement for any application seeking to extend or replace an existing dwelling within the CNP and referenced in Policy NE6 as a requirement, demonstrating no adverse harm to the character or landscape, to be fulfilled.</p>	<p>Design statements, under the auspices of SPG issued in December 2006, are already required to set out:</p> <ol style="list-style-type: none"> <li>1. how development will...complement the character of the area;</li> <li>3. a detailed landscape and visual impact assessment.</li> </ol> <p>This SPG reflects the policy regime of the 2002 Island Plan. The Minister will review and update it to reflect the 2011 Island Plan policy regime and to consider the extension of the requirement for design statements to be provided for applications in the CNP and GZ. In so doing, the Minister will have regard to the methodology referred to.</p>



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				Turning to the question of "Strategic Development" (Policy item numbered 17) this overlooks recreational & tourist facilities that may be essential in CNP but would not be entertained.	The Minister remains to be convinced that recreational and tourist facilities could be deemed to be considered as strategic development and is not minded to amend the Plan.
IR(1) -226	Mrs Celia Jeune	The National Trust for Jersey	Objecting	<p>The Island Plan is only two years old and was adopted by the States of Jersey at the end of June 2011 after numerous amendments and two weeks of debate. The existing policies were subject to extensive review and public consultation including an independent review by Planning Inspectors.</p> <p>To now seek to amend those policies, a mere 24 months into the life of the plan, without a similar high level of consultation and scrutiny amounts to revising the plan through the backdoor and undermines the whole process of developing and implementing a long term planning policy in a transparent, rigorous and cohesive manner.</p>	<p>Comments noted but not accepted.</p> <p>The Minister is not seeking to amend the entire Plan and is only proposing change where it is considered necessary.</p> <p>Of 140 policies in the current Plan, 11 are proposed for revision at this time, six of which are related to the matter of housing. Most importantly, the strategic framework for the existing Plan remains unchanged, and the proposed revisions are, in the view of the Minister, entirely consistent with this framework.</p> <p>The consultation complies with the requirements for consultation under law and the process is entirely transparent and open to scrutiny by the public and independent planning inspectors: it follows the same process as that employed for the 2011 Island Plan.</p>
				<p>The National Trust for Jersey does not agree with the Minister's suggestion that his proposed amendments to Policy NE6 will provide a stronger protection regime.</p> <p>We believe that this is misleading and that as a direct consequence the consultation process is inadequate and lacks complete transparency.</p>	<p>Comments noted but not accepted.</p> <p>The consultation complies with the requirements for consultation under law and the process is entirely transparent and open to scrutiny by the public and independent planning inspectors.</p>
				<p>The Minister is currently examining the efficacy of the other 2011 Island Plan policies and has stated that this may result in a further interim review.</p> <p>The National Trust finds it difficult to see how such a piecemeal approach to such an important issue is either desirable or practical. It also seems at odds with our Government's overall strategy of seeking greater efficiency and reducing department expenditure.</p>	<p>Comments noted.</p> <p>The States approved P.71/2013 which requires the Minister to determine whether further policies require review: this matter is ongoing.</p> <p>The current review is brought to ensure that the Plan remains up-to-date, clear, comprehensive and capable of meeting current requirements.</p>
				<p>The Minister has sought to justify his proposed revisions so as to ensure the Island Plan remains up-to-date and fit-for-purpose. The Trust cannot concur with such justification when the plan was written for a 10 year period and is a mere 24 months old.</p> <p>It is also stated that the principal driver for change is the delivery of affordable homes but as the Minister will be fully aware this could be achieved through the States Assembly approving the re-zoning of sites subject to specific planning conditions as opposed to amending policy.</p>	Any proposal to re-zone land for the provision of affordable homes amounts to an amendment of the Island Plan (see Part 2 of the Planning and Building (Jersey) Law 2002)
				<p>In relation to the Minister's reference to Royal Court judgements we should like to state that such judgements are there to ensure that Island Plan policies are adopted and implemented as per Planning Law. If this is not occurring then we would urge the Minister to immediately review the decision making process within his Department as opposed to amending the policies themselves. Otherwise we are at severe risk of simply writing and amending policy to fit in with the decisions being made by the Planning Panel, Officers and the Minister, as opposed to the policies democratically debated and adopted by our States Chamber.</p>	The review of policies is brought forward in response to a number of factors as set out in the briefing paper (July 2013).
				<p>The layout of the consultation document outlining the proposed amendments is complex and not easily accessible.</p> <p>It would considerably benefit from a more simple format clearly illustrating the differences between existing and proposed policies. This would then enable the general public to make fully informed decisions without having to wade through both plans in order to assess the implications of the amendments.</p>	<p>The proposed amendment has sought to highlight where change has been made and the justification seeking change is set out in the associated briefing papers.</p> <p>The subject is relatively complex and has been set out in as clear and accessible matter as possible.</p> <p>The Minister is open to constructive suggestion as to how the process might be made simpler to understand.</p>

Ref	Name	Agent/ Organisation	Supporting/ Objecting	Reasons for answer	Minister's Response
				Due to inadequacy of justification and process The National Trust for Jersey is unable to support the principle of this Island Plan interim view and sincerely hopes that the independent inspector will find likewise.	Comments noted. The terms of reference for the independent planning inspectors can be found here: <a href="http://www.gov.je/SiteCollectionDocuments/Government%20and%20administration/IPR1-Inspector%27s%20terms%20of%20reference%2020130925.pdf">http://www.gov.je/SiteCollectionDocuments/Government%20and%20administration/IPR1-Inspector%27s%20terms%20of%20reference%2020130925.pdf</a>
IR(1) - 231	Mr Charles Alluto	The National Trust for Jersey	Objecting	In the justification for amending Policies NE6 and NE7 the Minister states that he is seeking to achieve greater clarity and comprehensiveness as well as a stronger protection regime. The Trust very much welcomes such a commitment but unfortunately believes that the proposed amendments significantly fail to deliver such an outcome.	Comments noted.
				Where transparency of government is of paramount importance, the Trust would like to stress how disappointed it is to see how the amended policies have been presented. There is a complete lack of acknowledgment within the background papers regarding the proposed changes to commercial buildings and activities within both the CNP and Green Zone. Indeed the suggestion that the amendments have been brought forward in order to strengthen the 2011 Planning Regime so that it is less permissive than the 2002 Island Plan seems disingenuous given the nature and implications of some of the proposals.	The consultation complies with the requirements for consultation under law and the process is entirely transparent and open to scrutiny by the public and independent planning inspectors: it follows the same process as that employed for the 2011 Island Plan. The purposes for seeking to review NE6 are considered to be clearly set out in the pre-ambles to the proposed amendment to the policy as well as the briefing paper. The essential premise is that the CNP is a living and working landscape and that to prevent all forms of development here is unreasonable: the proposed amendment seeks to set out, in as simple and clear a way as possible, those forms of development that might be permissible in the CNP having regard to its landscape character..
				So often when reviewing such proposals the National Trust can be seen as being negative, although I hope on this occasion we will be viewed as a critical friend simply seeking to ensure that our planning policies reflect the Island's overwhelming desire to safeguard its natural environment.	The Minister will have due regard to all representations properly made.
				Omission of sections 2.59,2.60,2.61, 2.62 and 2.64 The omission of these sections appears to lessen the importance of the Countryside Character Appraisal as a material matter and in particular its recommendations for those areas which it identifies as having no capacity for any new development	The Minister is to publish the Countryside Character Appraisal (CCA) as SPG which can be used to assess the impact of development upon landscape character. Para. 2.46-2.48 and Proposal 4: Coast and countryside character of the 2011 Island Plan already requires that the Minister has regard to the CCA as a material consideration.
				NE6 2.64 Extension of a Dwelling – Background to Policy: Potential impact on the landscape of the immediate area If you wish to protect the landscape character of Jersey's coastline you have to review the potential visual impact of any proposed development in a wide context, rather than just the immediate area. Please refer to Policy GD5	Noted. The Minister is minded to make a minor amendment.
				NE6 2.71 Creation of new Households – Background to Policy The strongest possible presumption against all forms of new development has been replaced by the phrase that the creation of new households "will be strongly resisted". It is difficult to see why such terminology has been used, as it would seem to imply that if sufficient force is applied the policy will give way. Surely it should simply say "will not be permitted" thereby securing the clarity the Minister is seeking to achieve	The proposed amendment, as set out at NE6 (3) and (4), together with the pre-ambles at para 2.71 – 2.72 is considered to clearly set out the strongest presumption against the creation of a separate household in the CNP.
				NE6 2.75 Employment land use and buildings – Background to Policy The Trust felt the advice being provided in this section was rather vague and did not help to clarify or explain the possible implications to the policy, especially in relation to the presumption against new development. The Trust is therefore unable to support this amendment.	Comments noted.
				NE6 2.76 Extension and intensification of use – Background to Policy Permits development proposals to extend or intensify existing employment uses subject to a number of tests. Whereas the existing Island Plan seeks to prevent the extension and intensification of such commercial uses stating that "in this area there	The CNP is a living and working environment formed from the interaction of human intervention and nature. As with the existing residential properties in the CNP, the Minister considers it appropriate that the circumstances in which the reasonable expectation of existing employment uses might be assessed and considered is clearly



Ref	Name	Agent/ Organisation	Supporting/ Objecting	Reasons for answer	Minister's Response
				<p>will be a strong presumption against their redevelopment for other uses; their extension and the intensification of their use". The only exception relates to cultural or tourism attractions</p> <p>This policy amendment potentially serves to undermine the protection afforded to the Coastal National Park by allowing the intensification of use for industrial/commercial activities including mining.</p> <p>The Trust does not believe that the Minister has adequately outlined the implications of this substantial policy change to the public at large.</p>	<p>set out in the policy.</p> <p>Any proposals for new or extended mineral working i.e. sand extraction, would fall to be considered under NE6(19) and, as set out at para. 2.173, be subject to full EIA, as appropriate.</p> <p>The consultation complies with the requirements for consultation under law and the process is entirely transparent and open to scrutiny by the public and independent planning inspectors: it follows the same process as that employed for the 2011 Island Plan.</p>
				<p>NE6 2.85 Change of use: Conversion to other employment use – Background to Policy</p> <p>Permits conversion of commercial buildings for uses other than which permission was originally granted. The existing Island Plan seeks to restrict such conversions to employment related uses in support of the agricultural industry or rural economy</p> <p>No information has been provided to explain or justify the change in policy from restricting such conversions to specific industries in support of the rural economy. Also the sequential test in accordance with the Sequential Approach to Development has been omitted.</p>	<p>The policy makes clear that the need for a coastal or countryside location is provided in support of development of this nature.</p> <p>There may also be a requirement to demonstrate that consideration has been given to locations outwith the CNP which would be informed by the sequential test at Policy SP5, which remains material.</p>
				<p>NE6 2.88 Change of use: Conversion to residential or other non-employment use – Background to Policy</p> <p>Permits the conversion of existing commercial building other than agricultural sheds and glasshouses to residential usage. The existing Island Plan does not permit such conversions as it considers that they will undermine the Plan's Spatial Strategy and detract from the objective of a more sustainable pattern of development for the Island.</p> <p>In the absence of any detailed justification the Trust strongly believes that the existing policy is valid and should not be amended. It is also very difficult to see how this policy sits comfortably with the sentiments and objectives stated in 2.67 and 2.72</p>	<p>The Minister considers that an absolute prohibition on development of this nature is unreasonable and cannot be sustained in the CNP. The proposed amendment seeks to provide a clear policy framework against which proposals can be assessed. Justification for this approach is set out at paras. 2.88-2.93.</p>
				<p>NE6 2.110 Minor Development – Background to Policy</p> <p>Restricted permitted development rights within the Coastal National Park.</p> <p>The Trust welcomes this initiative but remains concerned that no firm timetable is being applied. The Minister is only committing himself to explore the issues as opposed to implementing a specific change or policy.</p>	<p>The implementation of this proposal requires amendment to the Planning and Building (General Development)(Jersey) Order 2011. This is not a policy issue and the timescale for its implementation is not appropriately addressed in the Island Plan.</p> <p>The proposal is part of the Department of the Environment Business Plan: amendment of the GDO is being progressed and will be brought forward in 2014.</p>
				<p>NE6 2.113 Strategic Development – Background to Policy</p> <p>Permits potential extension of quarrying, reservoirs and renewable energy facilities in the Coastal National Park. Existing Island Plan solely relates to renewable energy production.</p> <p>Whilst accepting the need for strategic development that is of Island wide interest, the Trust remains concerned at the suggestion of expanding sand quarrying in St Ouen's Bay. The Trust would refer the Minister to the Mineral Strategy which envisages the winding down of Simon Sand by 2018 and the restoration of the landscape thereafter.</p>	<p>The provision of a sufficient supply of aggregates during the Plan period remains of strategic importance and the proposed policy simply seeks to provide a framework against which any strategic development proposals might be assessed.</p> <p>Chapter 10 of the existing 2011 Island Plan remains unaffected by the Minister's proposed amendments and would remain material to the consideration of any such development application: this part of the Plan comprehensively deals with mineral extraction and the supply of aggregates for the Island.</p>
				<p>Policy NE6 – Point 7 Permits the extension and intensification of use of existing employment buildings and land</p> <p>The Trust is concerned that the presumption against all forms of new development is being weakened by the increasing amount of flexibility and exceptions being sought through such amendments</p>	<p>The CNP is a living and working environment formed from the interaction of human intervention and nature. The Minister considers that an absolute prohibition on development of this nature is unreasonable and cannot be sustained in the CNP. The proposed amendment seeks to provide a clear policy framework against which proposals can be assessed.</p>
				<p>Policy NE6 – Point 9 Permits the change of use of employment land and buildings to other employment uses.</p> <p>The Trust supports the existing policy which states that such changes of use relate to the agricultural industry or the rural economy.</p>	<p>The CNP is a living and working environment formed from the interaction of human intervention and nature. The Minister considers that an absolute prohibition on development of this nature is unreasonable and cannot be sustained in the CNP. The proposed amendment seeks to provide a clear policy framework against which proposals can be assessed.</p>
				<p>Policy NE6 – Point 10 Permits the change of use of employment land and buildings to residential or non-employment use</p>	<p>The CNP is a living and working environment formed from the interaction of human intervention and nature. The Minister considers that an absolute prohibition on</p>

Ref	Name	Agent/ Organisation	Supporting/ Objecting	Reasons for answer	Minister's Response
				In the absence of any detailed justification the Trust strongly believes that the existing policy is valid and should not be amended.	development of this nature is unreasonable and cannot be sustained in the CNP. The proposed amendment seeks to provide a clear policy framework against which proposals can be assessed.
				Policy NE6 – Point 15 Permits minor development The Trust is fearful that without a clear definition of what constitutes minor development this policy could be wrongly interpreted in the future.	A definition of what might constitute minor development is set out in para. 2.111.
				Policy NE6 Ministerial commitment to seek the removal of modern agricultural buildings and glasshouses, where they are derelict and/or redundant has been omitted. The Trust is disappointed to see that the Minister no longer wishes to make such a commitment given the positive impact it could have upon the landscape of the Coastal National Park	The Minister considers that this is not an Island Plan policy matter that can be materially effected except through the enforcement of appropriate planning conditions, where they exist.
IR(1) -100	Mrs Stephanie Steedman		Objecting	The purpose of the policy is to protect landscape. There are landscape assessment tools available to help assess proposals. Why not use them instead of being so prescriptive.	The Minister is to publish the Countryside Character Appraisal (CCA) as SPG which can be used to assess the impact of development upon landscape character. Para. 2.46-2.48 and Proposal 4: Coast and countryside character of the 2011 Island Plan already requires that the Minister has regard to the CCA as a material consideration. Similarly, Design statements, under the auspices of SPG issued in December 2006, are already required to set out: 1. how development will...complement the character of the area; 3. a detailed landscape and visual impact assessment. This SPG reflects the policy regime of the 2002 Island Plan. The Minister will review and update it to reflect the 2011 Island Plan policy regime and to consider the extension of the requirement for design statements to be provided for applications in the CNP and GZ.
				The policy acknowledges that the CNP is a living landscape and then prescribes narrowly what development will be considered acceptable. There are many hamlets and groups of residential development within the Park, which are anomalies to the wild and open character described as being important and the focus of protection.	There is a clear presumption against development in the CNP to ensure that the sensitive landscape character is protected. Where development does exist within the CNP, the policy seeks to provide a clear, comprehensive framework against which the reasonable expectation of residents and business to develop their premises might be assessed.
IR(1) -192	Mrs Susan Kerley		Objecting	I am very concerned that the revised plans allows the extension of residential and commercial buildings in the CNP and does not increase the protection of the natural beauty of the Coastal National Park or abide by the Island's Spatial Policies. With regard to NE6 The Coastal National Park. The existing Policy states Strongest possible presumption against all forms of new development and the extension and/or intensification of existing development. The policy also states that the conversion and reuse of existing commercial buildings for residential purposes will not be permitted because of the Spatial Policies. The revised Policy gives the possibility of redeveloping commercial buildings for residential use as well as traditional farm buildings. It also allows potentially large extensions to residential buildings so long there is not a significant increase in the number of occupants. The acceptability of an extension is judged on the potential impact on the landscape character of 'the immediate area', in some cases. With regard to Employment, the existing policy states that existing commercial buildings can be reused for employment related uses in support of the agricultural industry or the rural economy which do not detract from the character of the area. There is a strong presumption against their extension or intensification of use. The revised policy states that existing commercial buildings can be reused for employment uses which require a coastal or countryside location. Extensions or intensification of uses or buildings may be permissible.	The CNP is a living and working environment formed from the interaction of human intervention and nature. As with the existing residential properties in the CNP, the Minister considers it appropriate that the circumstances in which the reasonable expectation of existing employment uses might be assessed and considered is clearly set out in the policy. The Minister considers that the proposed amendment of Policy NE6 is entirely consistent with spatial planning policy framework provided by the 2011 Island Plan.

Ref	Name	Agent/ Organisation	Supporting/ Objecting	Reasons for answer	Minister's Response
				Some Policies in the original plan have been omitted such as The Minister will seek the removal of modern agricultural buildings and glasshouses where they are redundant or derelict in the Coastal National Park.	The Minister considers that this is not an Island Plan policy matter that can be materially effected except through the enforcement of appropriate planning conditions, where they exist.
				Crucially sections 2.59, 2.60, 2.61, 2.62 and 2.64 of the Countryside Character Appraisal have been omitted and the primacy of the CCA appears to have been diluted. In particular the recommendations for areas which the CCA identifies as having no capacity for any new development. I am very concerned that the CNP will turn out to be developed to the detriment of the Island's environmental capital and both Islanders wildlife and visitors will be the ultimate losers.	The Minister is to publish the Countryside Character Appraisal (CCA) as SPG which can be used to assess the impact of development upon landscape character. Para. 2.46-2.48 and Proposal 4: Coast and countryside character of the 2011 Island Plan already requires that the Minister has regard to the CCA as a material consideration.
IR(1) -181	Vivien Vibert		Objecting	The proposed changes are massive and to analyse how they alter the current NE6, fit with the current and proposed NE7 and other matters such as Proposal 4a would be a major project. There is a lot of repetition, which makes for confusion and ambiguity, there is no clarity, some parts of some paragraphs are repeated in the Policy, all of which is dangerous for future interpretation whatever the content.	The policies and the pre-ambles to them have been broken down to deal with specific forms of development that might be permissible in the CNP and GZ in an attempt to clearly explain the policy framework that will be applied to a comprehensive range of development types: hence the repetitious nature of the policy. A more concise policy could be adopted but this, it is considered, would lack the necessary clarity and specificity.
				The Countryside Character Appraisal has been reduced to a "valuable tool" instead having prime importance such as in current paragraphs 2.64, 2.75 and 2.87.	Para. 2.46-2.48 and Proposal 4: Coast and countryside character of the 2011 Island Plan already requires that the Minister has regard to the CCA as a material consideration.
				The St Ouen's Bay Planning Framework is said to be superseded by the Coastal National Park, but should be included because it is specific to St Ouen's Bay which is completely different from other areas of the CNP. In sum, this proposal is unworkable, gives less protection than the current Island Plan and if any of it were to be adopted it would need drastic revision.	The St Ouen's Bay Planning Framework was superseded when the 2011 island Plan was adopted on 29 June 2011 (see p.ii of 2011 Island Plan). The Minister's proposed amendment builds upon the evolution of planning policy for the Island's special places, such as St Ouen's Bay as set out in the St Ouen Bay Planning Framework (SOBF) and the 2002 Island Plan, and re-introduces broadly similar objective parameters of assessment (see SOBPF Policy SO15: Extensions and alterations to dwelling and SO16: Replacement buildings and 2002 Island Plan Policy C4: Zone of Outstanding Character).
IR(1) -73	Wayne Le Marquand		Objecting	Policy NE6 - Coastal National Park Residential development The preamble to the policy states that one of its primary purposes is the conservation and enhancement of the natural beauty, wildlife and cultural heritage of the National Park. It is acknowledged that the landscape is a living one. Protection of the landscape character appears to be the key driver that will be used by the Planning Minister when assessing proposals. The supporting text says 'there is a need to provide for the reasonable expectation of residents of the Coastal National Park to improve their homes .. having regard to the capacity of the landscape to accommodate development without harm'. It is stated that the key test for assessing proposals will be 'the capacity of the site and its context to accommodate development without harm to the landscape character'. Why then is the list of the types of development that will/will not be allowed so prescriptive? If harm to the landscape character is the key test of acceptability, then an assessment of the impact of any development upon the landscape character of the site and its contribution to the character of the National Park should be the tool used to assist decision-makers. There are landscape assessment tools that can be used to provide assistance about understanding the impact of development proposals, why not use them?	The Minister is to publish the Countryside Character Appraisal (CCA) as SPG which can be used to assess the impact of development upon landscape character. Para. 2.46-2.48 and Proposal 4: Coast and countryside character of the 2011 Island Plan already requires that the Minister has regard to the CCA as a material consideration. Similarly, Design statements, under the auspices of SPG issued in December 2006, are already required to set out: 1. how development will...complement the character of the area; 3. a detailed landscape and visual impact assessment. This SPG reflects the policy regime of the 2002 Island Plan. The Minister will review and update it to reflect the 2011 Island Plan policy regime and to consider the extension of the requirement for design statements to be provided for applications in the CNP and GZ. In so doing, the Minister will have regard to the methodology referred to
				If permitted development rights are removed, the Planning Minister will have control over all development in the Park area.	The removal of some permitted development rights will require amendment to the Planning and Building (General Development) (Jersey) Order 2011 which will be the subject of separate consultation: the extent of control will be determined through this separate process.



Ref	Name	Agent/ Organisation	Supporting/ Objecting	Reasons for answer	Minister's Response
				In order to protect householders reasonable expectations, the prescriptive presumption against development should be modified to allow exceptions that are not harmful to the character of the Park to be considered favourably. As presented the policy appears to restrict householders living in the National Park from: building any ancillary structure building any large extension even where it is invisible from public views and would not have any impact upon the landscape or visual character of the Park; providing for dependent relatives It is suggested that the policy should be worded so that it is less prescriptive; to allow the reasonable expectations of residents to improve and extend their properties to be met.	Given the sensitivities of the landscape in the CNP and the limited provision of infrastructure here, the proposed amendment seeks to presume against ancillary buildings; large extensions; and the creation of separate households.
IR(1) -4	Anonymous		Supporting	we need to preserve out coastal areas	Support noted.
IR(1) -91	Anonymous		Supporting	but then why was Plémont given the go-ahead which is against this policy?	The proposals for the development of the Plémont Holiday Village (P/2011/1673) were primarily in the GZ and thus considered in relation to the policy regime that applies to it (i.e. Policy NE7)
IR(1) -11	Anonymous		Supporting	except part 7	Noted.
IR(1) -49	Chris Lamy		Supporting	I look down along the West Coast every day and feel so lucky that some sense prevails.	Support noted.
IR(1) -138	Deputy John Young		Supporting	The States agreed this policy required review when it approved my proposition P 71/2013 (attached) The Coastal strip which surrounds Jersey is one of most precious assets which the island must conserve for tourism and economic reasons as well as for the benefit of residents This zone needs to have the highest level of protection afforded by the Planning system. The present policy has been difficult to apply and constituents have complained of inconsistent development control decisions. The proposed strengthening of this policy NE6 is to be supported .The landward boundaries also would benefit from a review as evidenced by the Plemont decision, where a coastal headland of conservation value was excluded from the Coastal National Park zone and treated as green zone, and lesser protection applied.	Support noted. The review of CNP boundaries is not part of the Minister's proposed amendment to the Plan. NB The coastal headland at Plémont (La Tete de Plémont) is designated as character type A: cliffs and headlands and included in the sub-division A1: N .Coastal headlands in the CCA. For this reason it is included in the CNP. This is distinct from the site of the former holiday village which is defined as being within E1: interior agricultural land and the sub-division E1 NW headland, which is within the GZ. This issue was closely considered by the Planning Inspector as part of the Plémont Public Inquiry (see para. 191 of the inspector's report).
IR(1) -176	Martin Whitley	La Comité du Commune Rurale St. Jean	Supporting	This provides greater balance and a more realistic and sensible approach to permissible development, but the Comité is concerned that this will have a great effect on people's personal assets and the ability to adapt their own homes.	Noted. The proposed amendment to the policy seeks to provide for the reasonable expectation of home improvement within a highly sensitive environment.
IR(1) -161	Mr Howard Snowden	Jersey Water	Supporting	This representation to the Independent Inspector in relation to the 2011 Island Plan Interim Review is made on behalf of Jersey Water and in relation to Val de la Mare Reservoir. Attached is the consultation response made in relation to the previously proposed Supplementary Guidance 'Policy application NE6 Coastal National Park May 2012' which sets out the need for a change in policy; as now proposed by the Minister. I would be grateful if this document, along with the Water Resources Management Plan, could be passed to the Inspector for their consideration. Mr Pilley's letter 7th August 2013 to this Practice explained the Minister for Planning and Environment seeks to amend Policy NE6 rather than issue supplementary Planning Guidance. This representation welcomes the Minister's decision to do so. Jersey Water welcome the Minister's proposed changes to Policy NE6 (and by consequence NR9) specifically the 'explicit recognition that some strategic development may be required in the Coastal National Park'. In doing so Jersey Water does recognise that any future application to increase the capacity of Val de la Mare Reservoir would need to be justified operationally and environmentally.	Support noted
IR(1) -17	Mr John Shenton		Supporting	The protection of the CNP should be granted the highest protection but should not infringe on the rights of the landowner. There must always remain the presumption that development of existing structures is permissible as long as they fit within the balance of the area	Support noted
IR(1) -15	Mrs Rosemary Evans		Supporting	Once again this would appear to strengthen the protection of the Coastal National Park	Support noted
IR(1) -233	Dr Robert		Objecting	Sections 2.111 and 2.112 indicate strong presumption against new ancillary buildings	The Minister is not minded to amend the Plan to classify the development of ancillary

Ref	Name	Agent/ Organisation	Supporting/ Objecting	Reasons for answer	Minister's Response
	Kisch			<p>in the National Park. While understandable, consideration should be allowed for the cases of</p> <p>(a) an underground garage for an existing dwelling</p> <p>(b) infill development of a roadside site within similar architecture to neighbours (e.g. single storey bungalow).</p> <p>The grounds for these are, the former has no visible factor other than the disappearing approach driveway. The latter forms a natural continuation of the present property roadside, merely developing what is now lawn, all services being readily available.</p> <p>I suggest section 2.111 line 4 be amended thus; "Exceptions to allow underground development, infill development and minor alterations .."</p> <p>The overall presumption against development is clearly established by 2.112.</p>	<p>buildings in the CNP as potential exceptions to the strong presumption against development on the basis that these will likely have an adverse landscape impact upon the sensitive landscape character of the CNP. As acknowledged by the respondent, even an underground structure is likely to have some overground visual implications (in the case of garage, this will involve a drive and a significant change in levels). This does not, however, preclude other forms of development underground where they fall with the potential exceptions proposed by the policy.</p> <p>The provision of 'infill development' is specifically precluded by the policy where it would involve the development of new buildings in the CNP, particularly where this would involve the creation of a new home, as set out at para 2.71 and NE6(3).</p>

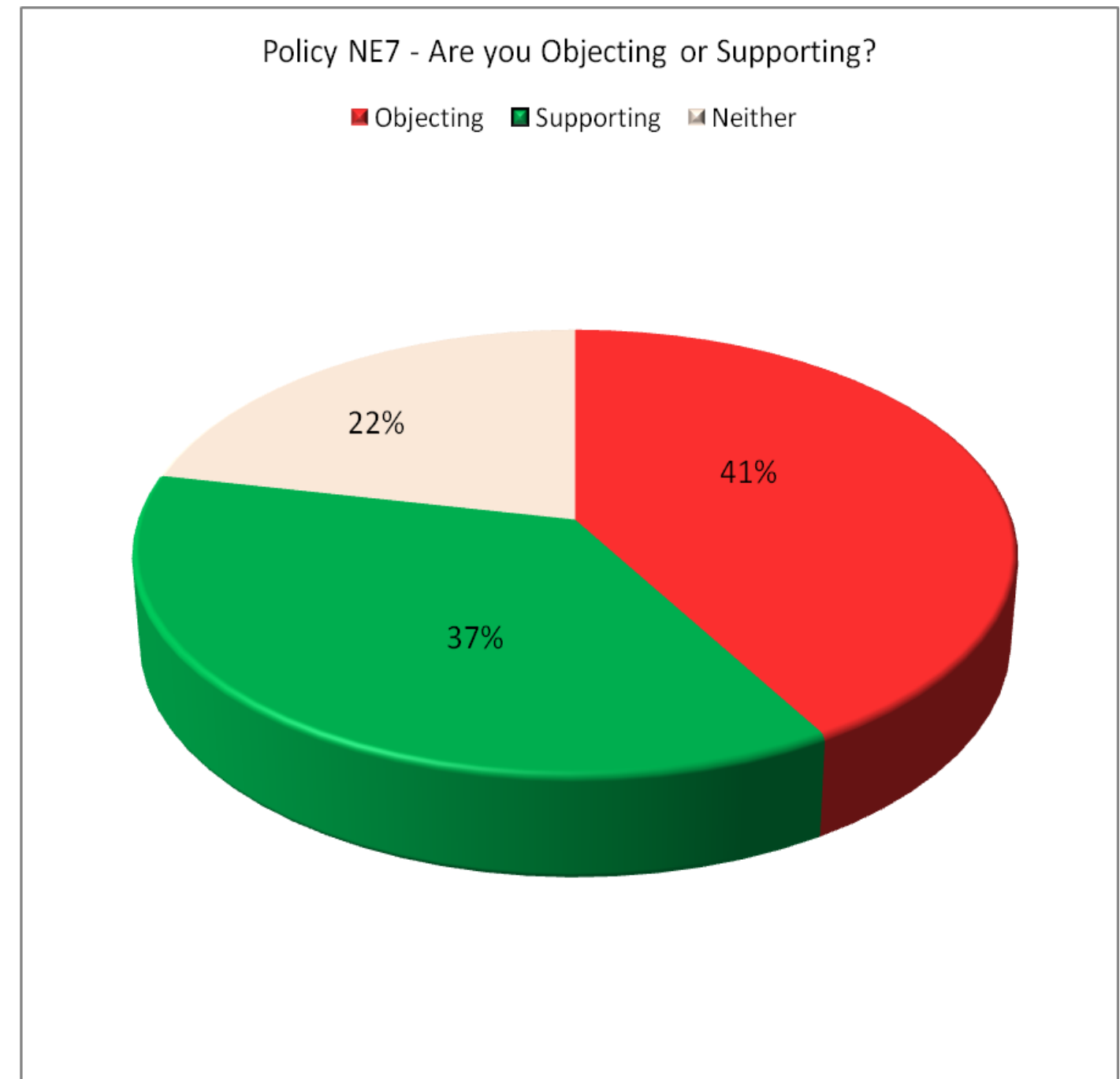


## Policy NE7: Green Zone

The Minister proposes to amend the Green Zone Policy NE7

### Consultation questionnaire results

	% Total	% Answer	Count
<b>Number of responses</b>	27%	-	60
<b>Objecting</b>	11%	41%	25
<b>Supporting</b>	10%	37%	22
<b>Neither</b>	6%	22%	13
<b>[No response]</b>	73%	-	159
<b>Total</b>	<b>100%</b>	<b>100%</b>	<b>219</b>



## Policy NE7: Green Zone - comments

Ref	Name	Agent/ Organisation	Supporting/ Objecting	Reasons for answer	Minister's Response
IR(1) -83	Celia Scott-Warren		Neither	My concern for the ongoing protection of the Green Zone means that I cannot support the proposed Policy NE7 at this time.	Comments noted.
IR(1) -49	Chris Lamy		Neither	<p>I do not totally agree with 16, 'The strongest in the Green Zone against the development of glasshouses for another use'.</p> <p>If after a certain space of time a glasshouse site has obviously become derelict through non use over several years it should be compulsorily purchased by the States at the current glasshouse value + a single figure %. say £90,000 per vergeé. Six sites per vergeé could then be made available for first time buyers at £15,000 each. Two bed roomed starter homes of say eight hundred square feet with room for later extension could be built on these sites at sa£150 per square foot, ie. £120,000.</p> <p>These homes would only be available to Jersey born first time buyers and could only be re-sold to Jersey first time buyers at cost + inflation + the proven costs of any structural extensions to the property. A States Loan for the buyers could be re-introduced returning money to the fund set up to finance these developments.</p> <p>Each house should have built within it's foundations two storage tanks of 5,000 litres each, one for the storage of grey water for car washing; lavatories and garden irrigation the other for collected rain water from the roof to be used for clothes; dishwasher and personal washing. These tanks to have solar pumps to header tanks in their roof spaces. These systems of water collection to be used in both the 80% and the 20% split of policy H1 however social housing should not be mixed with occupier owned housing on the same site.</p>	<p>The use of all derelict glasshouse sites for the provision of homes would not accord with the Spatial Strategy of the 2011 Island Plan.</p> <p>The Minister has considered and assessed those with the most potential to contribute toward the need for affordable homes and is proposing to rezone these (see proposed amendment to Policy H1).</p> <p>The existing 2011 Island Plan Policy ERE7: Derelict and redundant glasshouses, sets out the policy framework by which the use/development of derelict glasshouses sites can be assessed.</p>
IR(1) -177	Deputy John Le Fondré	States Member (St. Lawrence)	Neither	<p>Generally supportive of increasing protection for the green zone. However, whilst I am always concerned at development of greenfield sites, I am less concerned when there is an existing building.</p> <p>To me, therefore, exceptions 3(a) and 3(b), or even 1(c) and (d) are too restrictive. For example if a family (2 adults, 1 child) wanted to knock down an existing building and rebuild it, incorporating accommodation for (say) 1 set of grandparents, that would represent approx. a 60% increase in occupation, yet would be certainly something I could support.</p> <p>Equally could someone want to replace a 2 bedroom house with a 3 or 4 bedroom house, in anticipation of a larger family etc - again, that would not be of concern - there is a reasonably substantial building in existence already.</p>	<p>It is relevant to note that there is a general presumption against development in the Green Zone.</p> <p>The cumulative impact of the extension and replacement of dwellings with larger modern properties along the coast in particular has lead to increasing concern about the creeping urbanisation and incremental erosion of the Island's landscape character: the proposed amendment seeks to respond to this concern.</p> <p>Whilst the general presumption against the creation of new households in the countryside prevails, the proposed amendment does permit some flexibility (see para 2.136 and Policy NE6 (1) (e).</p> <p>The Minister's proposed amendment seeks to introduce some degree of objectivity to the policy whilst still retaining some flexibility to consider the particular circumstances of each case on its individual circumstances and, most importantly, its affect on the landscape character.</p>
IR(1) -67	Mr James Godfrey	Royal Jersey Agricultural & Horticultural Society	Neither	There are too many exemptions for this to be sufficiently robust.	Comments noted.
IR(1) -173	Mr M Cotillard	Jersey Construction Council	Neither	<p>It is noted that the "highest" level of protection is afforded to the coastal national park areas and a "high" level of protection is afforded to the green zone. These two areas combined cover the vast majority of the Island.</p> <p>Whilst there are provisions in the Policy setting out guidelines for exemptions within these areas, the Jersey Construction Council believes that there are many sites which could be utilised for housing within these areas and is of the belief that the plan as proposed could cause difficulty in providing much needed housing in the future.</p> <p>One such example would be the potential use of further glasshouse sites or Parish village developments within the green zone.</p>	<p>There is no change to the extent of land covered by the CNP and the GZ and the relative level of protection afforded to each as part of the Minister's proposed revisions.</p> <p>The presumption against development in these areas remains in the Minister's proposed amendment to policies NE6 and NE7 reflecting the thrust of the current policies NE6 and NE7. The proposed amendments seek to provide a clearer framework for the assessment of potential exceptions for residential development in the GZ at NE7 (1)-(6).</p> <p>The existing Island Plan already provides a planning policy framework for the assessment of proposals to develop glasshouses at Policy ERE7: Derelict and redundant glasshouses and for the provision of Parish village developments at Policy H5: Housing in rural centres.</p>

Ref	Name	Agent/ Organisation	Supporting/ Objecting	Reasons for answer	Minister's Response
IR(1) -23	Mr Peter Thorne		Neither	No significant changes	Comments noted.
IR(1) -85	N Melton		Neither	Unless this is rigorous then we land up with the same plemont problem. Also look at the golf at St Ouen that is now a golf course, shop and restaurant. If that had been asked for at the beginning it would not have been allowed. This seems to happen far too often we simply don't trust you anymore.	Comments noted.
IR(1) -48	President Graham J Le Lay	JERSEY FARMERS' UNION	Neither	The Union is mindful of the demand and need for allotments but we believe their provision can be achieved through the use of smaller parcels of land which are less attractive for modern farming practices, i.e. the fields are oddly shaped making the use of farm machinery impractical. The fields used should also be less than 1 vergee in size and they should be sited close to residential developments wherever possible.	Proposals for the provision of allotments on agricultural land in the GZ would fall to be considered within the context of the existing planning policy regime provided by Policies ERE1: Safeguarding agricultural land and SCO6: Allotments of the 2011 Island Plan.
IR(1) -187	Mr Jeremy Harris	States of Jersey Education, Sport & Culture Department	Objecting	It is noted that the scope of this interim review is limited to a small number of policies and proposals and does not involve a review of the entire plan. These policies include Policy NE7: Green Zone, and in this connection I would like to draw your attention to the study that is currently being conducted by ESC, in cooperation with Jersey Property Holdings, to assess options for the future development of Les Quennevais School. The options under consideration include a possible new school in the west of island to replace the existing facilities. The site for a new school has yet to be determined, but one of the potential sites is situated in the Green Zone, and ESC would therefore like to request that this be taken into account in considering revisions to the Island Plan. In this context, I understand that this may take the form of an amendment to point 19 of Policy NE7 (Strategic Development) to include a reference to key strategic education facilities. In this connection the Planning Minister is also asked to consider whether it would be necessary to amend Policy SC01 in order that this potential site for a new school to replace Les Quennevais would be 'safeguarded for educational use'.	The Minister is minded to amend; <ul style="list-style-type: none"> <li>para. 2.173 to set out the types of strategic development of Island-wide significance that might be considered in the GZ to include the generation of utility-scale renewable energy; the provision of public water supplies; the extraction of minerals; and the provision of other elements of significant public infrastructure, such as a new secondary school;</li> <li>Policy NE7(19) to make explicit reference to the provision of other elements of significant public infrastructure, such as a new secondary school, and to the need to ensure that the environmental implication of any such development is properly identified, avoided and/or mitigated as far as possible.</li> </ul> Amendment of Policy SCO1 is not required in the absence of a specific site.
IR(1) -12	Anonymous		Objecting	Keep what little green space left green.	Comments noted.
IR(1) -10	Anonymous		Objecting	no more developments in the green zones or coastal regions as before	Comments noted.
IR(1) -13	Anonymous		Objecting	Either the States wish to protect the CNP and Green Zone or they do not and these continual attempts to nibble away at the protections we all thought were in place does the process no credit whatsoever. The zoning having been established in a 10 year Plan the populace deserve a rest from this continual tinkering!	The Minister is proposing amendment to this policy to ensure that it is as clear, robust and comprehensive as it might be.
IR(1) -18	Anonymous		Objecting	The regular use of the word 'serious' is concerning - subjective view again and open to abuse as are clauses clause 14, as an example, where Planning have in the past been 'misled' in respect of ultimate intentions.	Comments noted.
IR(1) -7	Anonymous		Objecting	The whole of this proposal is a developers dream and is totally outwith the boundary of Policy NE7 Green Zone. Green Zone being the GREEN ZONE and not changed to suit the whims of certain individuals.	?
IR(1) -24	Anonymous		Objecting	We must protect our CNP and green areas	Comments noted.
IR(1) -114	Carlo Riva	The Association of Jersey Architects	Objecting	There seems to be little to distinguish the restrictions to this Zone and those of the CNP - they seem to be almost as restrictive. A separate section should be prepared to clearly demonstrate the DISTINCTIONS between the 2 Natural Environment Zones to ensure easy clarity.	The key distinctions between the zones are set out in the briefing paper (July 2013): see p.6.

Ref	Name	Agent/ Organisation	Supporting/ Objecting	Reasons for answer	Minister's Response
				We strongly object to the restrictions on floor area for redevelopment projects - Policy numbers 10a and 13b.	The Minister's proposed amendment seeks to introduce some degree of objectivity to the policy whilst still retaining some flexibility to consider the particular circumstances of each case on its individual circumstances and, most importantly, its affect on the landscape character.
				Policy numbers 15 and 16 are NOT helpful and suggest an impasse. WHAT IS TO HAPPEN to these modern agricultural and greenhouse sites. This contradicts the fundamental objective in Article 2(a) of the Planning & Building (Jersey) Law 2002, stating the intention of this Law is:- "(a) to ensure that when land is developed the development is in accordance with a development plan that provides for the orderly, comprehensive and sustainable development of land in a manner that best serves the interests of the community " Accordingly, this Policy in regards to these building types is not workable as it offers no real or tangible resolution for the redundancy of these structures.	Modern agricultural buildings have been permitted in the countryside to support agriculture: if they are no longer to be used for this purpose their alternative use can be considered under the auspices of Policy NE7(11). Their replacement for another use is not considered to serve the best interest of the community in that it challenges the spatial strategy of the Plan and the protection of the countryside. Proposals in relation to derelict and redundant glasshouses can be considered under the auspices of ERE7.
IR(1) -25	Carlo Riva	Riva Architects Ltd	Objecting	There seems to be little to distinguish the restrictions to this Zone and those of the CNP - they seem to be almost as restrictive. A separate section should be prepared to clearly demonstrate the DISTINCTIONS between the 2 Natural Environment Zones to ensure easy clarity.	The key distinctions between the zones are set out in the briefing paper (July 2013): see p.6.
				We strongly object to the restrictions on floor area for redevelopment projects - Policy numbers 10a and 13b.	The Minister's proposed amendment seeks to introduce some degree of objectivity to the policy whilst still retaining some flexibility to consider the particular circumstances of each case on its individual circumstances and, most importantly, its affect on the landscape character.
				Policy numbers 15 and 16 are NOT helpful and suggest an impasse. WHAT IS TO HAPPEN to these modern agricultural and greenhouse sites. Accordingly, this Policy in regards to these building types is not workable as it offers no real or tangible resolution for the redundancy of these structures.	Modern agricultural buildings have been permitted in the countryside to support agriculture: if they are no longer to be used for this purpose their alternative use can be considered under the auspices of Policy NE7(11). Their replacement for another use is not considered to serve the best interest of the community in that it challenges the spatial strategy of the Plan and the protection of the countryside. Proposals in relation to derelict and redundant glasshouses can be considered under the auspices of ERE7.
IR(1) -138	Deputy John Young		Objecting	This policy is the most used of all development control policies and the Planners will have a great deal of experience in applying it to applications. Yet they have not produced any document either explaining the changes to the existing policy or why they are proposed. The proposed amendment simply highlights 20 or so pages of the complete text of the replacement policy rationale and the new policy itself. This is not satisfactory especially as limited time has been allowed for consultation. We have had insufficient opportunity to consider the changes to this policy. I therefore reserve the right to raise points of contention.	Please see Briefing Paper: Coastal National Park and Green Zone (July 2013)
				I am presently aware of problems with the employment land policy where the SPG has proven problematic and I referred to this in my proposition P71/2013 for review.	Comment noted. This is not relevant to the current Island Plan review as the Minister is considering those issues raised by P.71/2013 and not dealt with by the current review, separately.
				I am also concerned that the exceptions for residential accommodation in this zone are presently so drafted to exclude multi generation homes which were also included in P 71 /2013. Guernsey has a dower homes policy and with the high cost of accommodation I would like to see flexibility in the policy to enable the conversion and extension of existing dwellings to accommodate multi generation homes, subject to appropriate conditions. Overall I agree with the National Trust for Jersey that this policy should be unchanged from at present unless a case is made during the submissions to the inquiry to justify the variation of this important policy.	Multi-generational homes are not necessarily precluded from being provided in the GZ: see para. 2.136 and Policy NE7(1)(e).
IR(1) -162	Ian Taylor	Jersey Chamber of Commerce	Objecting	See comments on policy NE6	See response on NE6



Ref	Name	Agent/ Organisation	Supporting/ Objecting	Reasons for answer	Minister's Response
IR(1) -5	L & M Howard		Objecting	The Green Zone protections should not be further diluted. The sheer volume of words contained in the Ministers proposals suggest that it is intended to find some way of relaxing the protections and should be resisted.	The policies and the pre-amble to them have been broken down to deal with specific forms of development that might be permissible in the CNP and GZ in an attempt to clearly explain the policy framework that will be applied to a comprehensive range of development types: hence the repetitious nature of the policy. A more concise policy could be adopted but this, it is considered, would lack the necessary clarity and specificity.
				Additionally, we have just had a new Island Plan approved in 2011 and owners of land in or adjacent to the Green Zone are entitled to rest easy in the knowledge that their property will not be prejudiced by speculative applications which can often remain extant for months or years (try marketing a property with the blight of uncertainty!).	The Minister is proposing amendment to this policy to ensure that it is as clear, robust and comprehensive as it might be.
IR(1) -135	Mr and Mrs Labey		Objecting	Jersey is a small place and it's most scarce resource is land. No-one wants to support the de-spoiling of the countryside of the island or undermine the purpose of policies that protect its landscape character. The island's heritage has created a particular arrangement of land-use circumstances; the countryside has been shaped by families living and working together. The current policies break that tradition.  Scattered around the island are small, outworn redundant agricultural/commercial buildings forming small sites that are part of existing building groups. The replacement of these buildings (that have demonstrated they are redundant to any future viable agriculture or employment use in accordance with the requirements of Supplementary Planning Policy - Protection of Employment Land), provide an opportunity to provide affordable housing units, without harming the character of the island. Affordable housing is a key issue for the island. There are many Jersey families that could help reduce the burden for family members if they were allowed to redevelop brownfield sites as described above. The opportunity for families to provide affordable housing for family members appears to be being missed as a result of the very strict interpretation of the current Policy NE7.	Paras. 2.159-2.165 and Policy NE7(12) provide the test for replacement of redundant agricultural/commercial buildings to residential use.
				The current tests appear to be based not upon landscape impact or potential harm to the landscape, but by a prescriptive set of assessment tools - the result being not the best use of land. The proposed changes to the policy appear to make the tests even more prescriptive and provide even fewer opportunities to present a balanced approach. There is an opportunity for the island to reduce the numbers requiring help to achieve affordable housing, without harming the landscape of the island.	The Minister's proposed amendment seeks to introduce some degree of objectivity to the policy whilst still retaining some flexibility to consider the particular circumstances of each case on its individual circumstances and, most importantly, its affect on the landscape character.
				The strategic aims of the Plan (reducing vehicle movements and trip generation) are understood. What appears to be missed is that by allowing family members to live close together, trip generation between them is reduced. There is also a greater likelihood that trips (to work, shopping, etc) will be shared. Allowing family members to live in close proximity also supports the strategic policies of the island to encourage older people to live in their homes for longer.  It is suggested that the wording of the policy should be less prescriptive and that assessment should focus on an assessment of harm to the landscape character. It is also suggested that the wider benefits of allowing family groups to support each other and live together should be supported as a purpose in the Plan.  Mr and Mrs Labey feel that Policy NE7 should allow for greater flexibility and provide for 'common sense' to prevail over very prescriptive rules and regulations.	The principle of allowing family members to support one another is acknowledged and Policy NE7 does not preclude the provision of multi-generational homes in the GZ (see para 2.136 and NE7(1)(e)).
IR(1) -189	Mr John Mesch	Council for the Protection of Jersey's Heritage	Objecting	The revised sections dealing with policies for the Natural Environment are unsatisfactory in that they provide less clarity than before in explaining the reasons for having each policy. It is essential that statements of policy and their justification are easily understood by applicants and decision makers alike.	The policies and the pre-amble to them have been broken down to deal with specific forms of development that might be permissible in the CNP and GZ in an attempt to clearly explain the policy framework that will be applied to a comprehensive range of development types.
IR(1) -17	Mr John Shenton		Objecting	The fabric and landscape of the island changes on a daily basis and to have such rigidity around development in the green zone will only result in future problems. There must be a presumption against development but allow flexibility within the policy to allow the island move with the times.	The Minister's proposed amendment seeks to introduce some degree of objectivity to the policy whilst still retaining some flexibility to consider the particular circumstances of each case on its individual circumstances and, most importantly, its affect on the landscape character.



Ref	Name	Agent/ Organisation	Supporting/ Objecting	Reasons for answer	Minister's Response
IR(1) -43	Mr Marc Burton	Institute of Directors	Objecting	We consider that these amendments are fairly onerous as we estimate that 90% of the properties in island will be affected by this change which could severely affect construction work to these properties or more importantly in these areas. Issues surrounding affordable homes etc could be affected in the future when considering re-zoning land in the green zone;	Impact of proposed amendment is over exaggerated and flawed. The majority of the Island's homes are within the Built-up Area boundary and are thus unaffected by this proposed amendment. The policies and the pre-amble to them have been broken down to deal with specific forms of development that might be permissible in the CNP and GZ in an attempt to clearly explain the policy framework that will be applied to a comprehensive range of development types: the thrust of the policy remains consistent with that which presently exists.
IR(1) -32	Mr Michael Stein	MSPlanning Ltd	Objecting	Proposals are too onerous and preventing householders to extend or redevelop their homes to meet modern living expectations	The reasonable expectations of householders living in the GZ, in terms of the potential to increase the size of their homes, needs to be balanced against the need to protect the landscape character they have chosen and have the opportunity to live in and enjoy. Where existing homes in the GZ fail to meet the Minister's <i>minimum</i> housing standards Policy H6 and the requirement to upgrade the accommodation to meet <i>minimum</i> standards will remain a material consideration.
IR(1) -139	Mr Michael Stein	MSPlanning Ltd	Objecting	See comments on policy NE6 - Coastal National Park	See response on NE6
IR(1) -130	Mr Paul Harding	BDK Architects	Objecting	Paragraph 2.1.24 of the 2011 Island Plan: Interim Review consultation draft acknowledges that:- " As a landscape largely created by human intervention, however, it would be unreasonable to preclude all forms of development. Policy NE7 does not, therefore, confer an absolute moratorium on development in the Green Zone but there is a strong presumption against development: the key test is the capacity of the site and its context to accommodate development without harm to the landscape character. This is the starting point for the consideration of development proposals. " However the proposed amendments to Policy NE7 makes it virtually identical to Policy NE6 as amended in the consultation draft for which no justification is offered in the accompanying Briefing Paper - it makes no sense for two distinct zones to have virtually identical Policies applied.	Please see Briefing Paper: Coastal National Park and Green Zone (July 2013) for explicit distinctions between the two zones: p.6.
				We Strongly Object to restrictive limitations being applied on 'scale', 'size', 'footprint' & 'floorspace' (Policy amendments numbered 1(a), 1(c), 1(d), 2(a), 3(a), 3(b), 9(a), 10(a), 13(b)) for the reasons we set out relating to Policy NE6 above.	The Minister's proposed amendment seeks to introduce some degree of objectivity to the policy whilst still retaining some flexibility to consider the particular circumstances of each case on its individual circumstances and, most importantly, its affect on the landscape character.
				Proposed Policy numbers 15 & 16 suggest that any redundant agricultural or glasshouse buildings in the Green Zone will be placed in a moratorium where there will be a complete impasse against any future use of the land. This contradicts the fundamental objective in Article 2(a) of the Planning & Building (Jersey) Law 2002, stating the intention of this Law is:- "(a) to ensure that when land is developed the development is in accordance with a development plan that provides for the orderly, comprehensive and sustainable development of land in a manner that best serves the interests of the community"	Modern agricultural buildings have been permitted in the countryside to support agriculture: if they are no longer to be used for this purpose their alternative use can be considered under the auspices of Policy NE7(11). Their replacement for another use is not considered to serve the best interest of the community in that it challenges the spatial strategy of the Plan and the protection of the countryside. Proposals in relation to derelict and redundant glasshouses can be considered under the auspices of ERE7.
				Turning to the question of "Strategic Development" (proposed Policy item numbered 19) this overlooks recreational & tourist facilities that may be essential in Green Zone but would not be entertained.	The Minister remains to be convinced that recreational and tourist facilities could be deemed to be considered as strategic development and is not minded to amend the Plan.
IR(1) -226	Mrs Celia Jeune	The National Trust for Jersey	Objecting	See comments on NE6	See response on NE6
IR(1) -100	Mrs Stephanie Steedman		Objecting	The purpose of the policy is to protect landscape. There are landscape assessment tools available to help assess proposals. Why not use them instead of being so prescriptive.	The Minister is to publish the Countryside Character Appraisal (CCA) as SPG which can be used to assess the impact of development upon landscape character. Para. 2.46-2.48 and Proposal 4: Coast and countryside character of the 2011 Island Plan already requires that the Minister has regard to the CCA as a material consideration.

Ref	Name	Agent/ Organisation	Supporting/ Objecting	Reasons for answer	Minister's Response
					<p>Similarly, Design statements, under the auspices of SPG issued in December 2006, are already required to set out:</p> <ol style="list-style-type: none"> <li>1. how development will...complement the character of the area;</li> <li>3. a detailed landscape and visual impact assessment.</li> </ol> <p>This SPG reflects the policy regime of the 2002 Island Plan. The Minister will review and update it to reflect the 2011 Island Plan policy regime and to consider the extension of the requirement for design statements to be provided for applications in the CNP and GZ.</p>
IR(1) -181	Vivien Vibert		Objecting	<p>Like NE6, the changes here are massive and difficult to compare to the current Island Plan, and doing a full analysis would be a major undertaking, impossible in the time available.</p> <p>It is full of unhelpful, misleading, ambiguous and value-laden sentences which have no place in such a document, such as: para 2.123 talks about there "still" being a general presumption against any development and certain areas "still" being sensitive to intrusive development. The use of the word "still" suggests that in general the controls against development are being relaxed and the repetition of cases being assessed "on their merits" without much guidance as to how that should be judged would allow all sorts of harmful development.</p> <p>para 2.124 says "NE7 does not, therefore, confer an absolute moratorium on development". There is not even an "absolute moratorium on development" in the Coastal National Park, and no one ever thought there would be such a moratorium in the Green Zone., so what is this sentence doing here if not to open doors to previously prohibited development?</p> <p>para 2.128 "Generally, the larger an extension the greater its impact will be" - a statement of the obvious which makes no contribution to anything. It is inadequate to have the "key test" (e.g. paras 2.124, 2.130) being the "impact on landscape character" as this marginalises the overall "key" which is SP1.</p> <p>One improvement in NE7 is restriction of size by reference to gross floorspace; if this principle is well defined and applied it could mitigate some of the worst planning decisions, the obscenely large house above La Coupe being a prime example.</p>	<p>The policies and the pre-amble to them have been broken down to deal with specific forms of development that might be permissible in the CNP and GZ in an attempt to clearly explain the policy framework that will be applied to a comprehensive range of development types: hence the repetitious nature of the policy. A more concise policy could be adopted but this, it is considered, would lack the necessary clarity and specificity.</p> <p>The CNP is a living and working environment formed from the interaction of human intervention and nature. The Minister considers that an absolute prohibition on development of this nature is unreasonable and cannot be sustained in the CNP. The proposed amendment seeks to provide a clear policy framework against which proposals can be assessed.</p> <p>Comments about introduction of some objective parameters to policy noted.</p>
IR(1) -73	Wayne Le Marquand		Objecting	<p>Policy NE7 - Green Zone Employment land use and building There appears to be no provision for new structures that might be required for commercial purposes. There also appears to be a requirement that any new development for employment purposes results in environmental gains or should be subservient to existing development.</p> <p>There will be occasions when proposals for development are driven by commercial need, where the size of a new building demands a specific location and relationship with existing buildings/uses on site. Provided that this context does not result in harm to the landscape character of the area, it is suggested that this scenario could be more robustly supported by the policy.</p> <p>It appears that the assessment framework proposed makes no allowance for a neutral situation. For example, where environmental gains and landscape impact retain the status quo and it can be argued that there is no harm. The key test for proposals appears to be the protection of landscape character, without any explicit requirement for an assessment of development proposals upon the key landscape character qualities that are judged to be important.</p> <p>It is suggested that the policy should be worded so that it is less prescriptive; to allow the realistic requirements of commercial operators to be met.</p>	<p>Paras. 2.139-2.151 and Policy NE7(8-11) provide a detailed framework for the consideration of employment-related development in the GZ.</p> <p>The Minister is not minded to amend his proposal.</p>
IR(1) -87	Anonymous		Supporting	17. leaves room for interpretation. One person's minor development is another person's Plémont or Portelet. How clearly will minor development be defined?	Paras. 2.170-171 set out an interpretation of minor development
IR(1) -91	Anonymous		Supporting	but again why was Plémont given the go-ahead?	The basis for the decision in relation to the former Plémont Holiday Village (P/2011/1673) is set out in the decision notice.
IR(1) -6	Anonymous		Supporting	But subject to same Employment comment to earlier question	See earlier response.

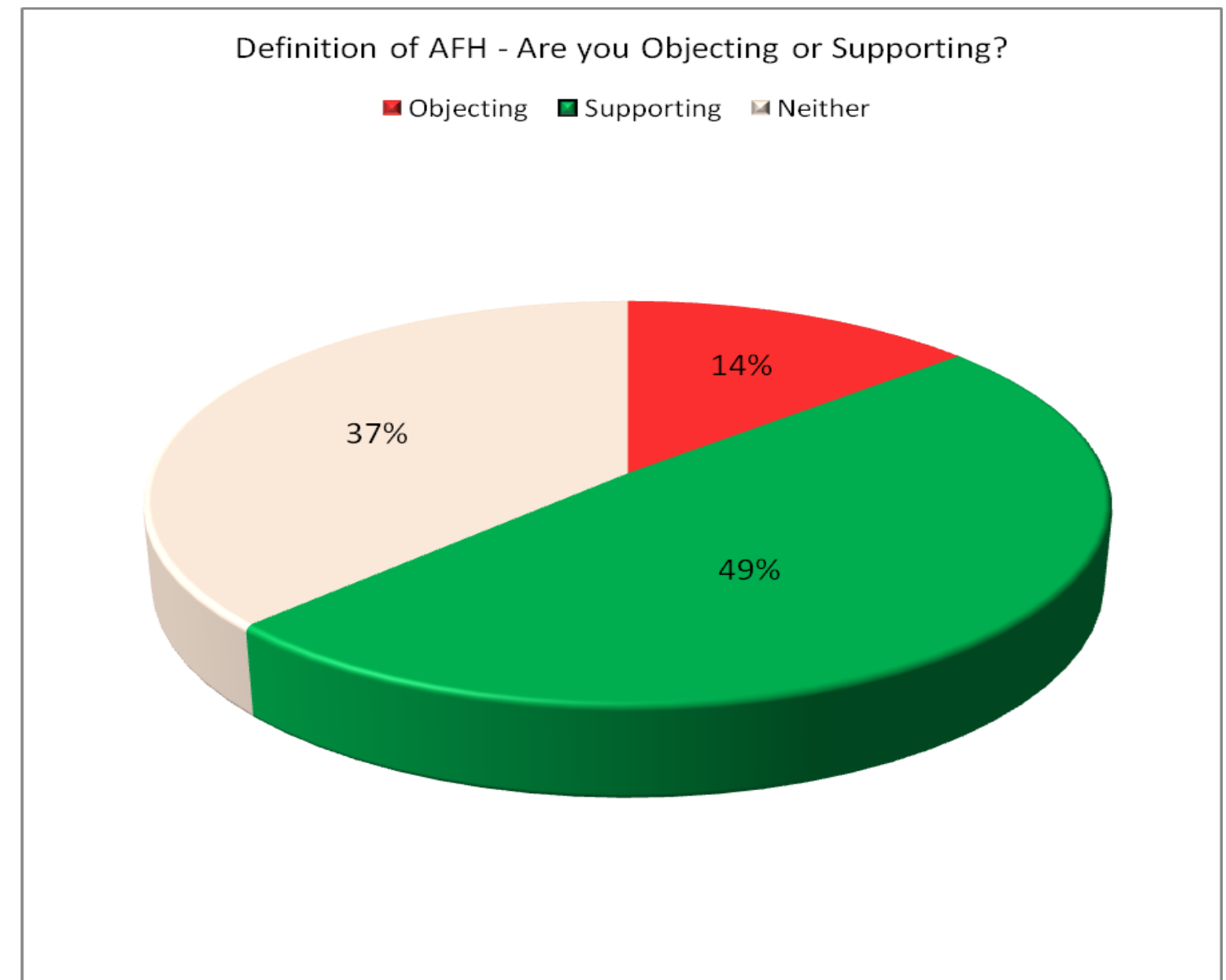
Ref	Name	Agent/ Organisation	Supporting/ Objecting	Reasons for answer	Minister's Response
IR(1) -11	Anonymous		Supporting	except part 8	Comments noted.
IR(1) -176	Martin Whitley	La Comité du Commune Rurale St. Jean	Supporting	This provides greater balance and a more realistic and sensible approach to permissible development, but the Comité is concerned that this will have a great effect on people's personal assets and the ability to adapt their own homes.	Noted. The proposed amendment to the policy seeks to provide for the reasonable expectation of home improvement within a highly sensitive environment.
IR(1) -30	Mr Martin Whitley		Supporting	The Green Zone should be protected against all development and we should be brave enough as an Island to not allow the construction industry to lead on this matter. Using unemployment/Housing shortages as a an excuse to develop our rural areas is not acceptable.	Comments noted.
IR(1) -15	Mrs Rosemary Evans		Supporting	Once again it would APPEAR to offer greater protection to the Green Zone	Comments noted.

## Definition of affordable housing

The Minister for Planning and Environment proposes amending the definition of affordable housing in the 2011 Island Plan

### Questionnaire consultation results

	% Total	% Answer	Count
<b>Number of responses</b>	23%	-	51
<b>Objecting</b>	3%	14%	7
<b>Supporting</b>	11%	49%	25
<b>Neither</b>	9%	37%	19
<b>[No response]</b>	77%	-	168
<b>Total</b>	<b>100%</b>	<b>100%</b>	<b>219</b>



## Definition of affordable housing - comments

Ref	Name	Agent/ Organisation	Supporting/ Objecting	Reasons for answer	Minister's Response
IR(1) -6	Anonymous		Neither	Another policy, using market intervention, which is useless in practical application and all those who blindly followed the H3 mantra, now disbanded, should re think this policy	The revised definition provides clarity and certainty in the development of affordable housing.
IR(1) -177	Deputy John Le Fondré	States Member (St.Lawrence)	Neither	Policies and criteria will need to be very clear, and objective. I think this is probably likely to create a separate market, presumably with price controls on certain types of housing. This will need to be separately consulted upon in my view to determine any potential consequences.	Comments noted. The Strategic Housing Unit will set the gateway criteria for affordable housing.
IR(1) -5	L & M Howard		Neither	There is no such thing as an affordable house in Jersey, only people who cannot afford to buy at the price the market determines. The sooner politicians appreciate that and stop interfering in market mechanisms the better. The market is already correcting itself as more supply comes on stream and people need to set their sights on a starter flat rather than a house.	The Minister's proposed amendment seeks to ensure that the planning system, as far as possible, can assist those most in need of assistance to access homes, for both rental and homes for purchase.
IR(1) -176	Martin Whitley	La Comité du Commune Rurale St. Jean	Neither	The definition still remains subjective and needs to be defined further. What is good quality design? The Comité supports the principle of community led development for St John.	Comments noted. It is considered that the definition is clear and provides certainty. The definition if good design can be subjective, but the department has published design guidelines which are used for assessing new developments. The Minister's proposed amendment seeks to help address Island-wide housing needs.
IR(1) -67	Mr James Godfrey	Royal Jersey Agricultural & Horticultural Society	Neither	This must not be used as a 'Trojan Horse' to permit development where it would otherwise not be permitted.	The majority of affordable housing will be delivered on existing sites within the built up area, with only a proportion proposed to be delivered on re-zoned brownfield land (Policy H1) and green field sites to support the villages (Policy H5)
IR(1) -173	Mr M Cotillard	Jersey Construction Council	Neither	For the private sector to provide affordable housing within the Island, a degree of certainty needs to exist within the planning process. The number one issue is the lack of a formal pre-planning application advice system, which we have mentioned in our response to the proposed appeals system, as being a fundamental building block in the planning process. From the perspective of industry as to why pre-planning application advice is required an example can be given where the previous Planning Minister came into power on a platform of upgrading the quality of buildings within the Island and there was a "cover it in granite and expensive façade" policy put in place. What developers and the construction industry need are guarantees that politics are removed from the planning process and they are not left at the whim of a change in Planning Minister which could happen at any time.	The provision of pre-application advice is an issue of process and not policy and cannot, therefore be addressed by the Island Plan. The department has, however, just launched a new pre-application service (October 2013) to ensure that clearer and more comprehensive pre-application advice is provided. Pre-application advice can, however, only be offered without prejudice to any subsequent determination as the decision-maker must take into account all material consideration some of which may not arise until development proposals are subject to a formal planning application process and, perhaps most significantly, public consultation. The provision of clear, comprehensive and up-to-date planning policy framework, represented by the Island Plan, can help to provide greater certainty. The definition of affordable housing together with the site assessments of each proposed rezoned site provides significant certainty for developers and land owners in delivering the sites for affordable housing.
				It is noted in your draft consultation document that the maximum median income for a two bedroomed home should be £44,000 with a 10% deposit. This equates to a two bedroomed home valued at no more than £230,000 and likewise the maximum median income for a three bedroomed home should be £60,000 with a 10% deposit this equates to a three bedroomed home valued at no more than £310.000. For these figures to be realistic there will need to be a reality check in terms of site density, which will inevitably lead to taller buildings to achieve land values that would help make these figures realistic. Furthermore, innovative materials need to be examined and utilised to achieve the type of building which the building by-laws dictate and this may require a re-think on building design and materials from the Planning Department.	The development of sites for affordable homes is considered to be viable within the range of densities indicated in each of the site assessments: any suggestion otherwise would need to be supported by supporting evidence. The Minister wishes to encourage the use of innovative construction methods to secure the delivery of well- designed and cost effective homes and would be happy to address any planning and/or building bye-law issues that might arise.
IR(1) -85	N Melton		Neither	Fed up with means testing never help the middle. Add up what a person on 30,000 a year is entitled to, then see how much you need to earn after tax and as to get the	Comments noted



Ref	Name	Agent/ Organisation	Supporting/ Objecting	Reasons for answer	Minister's Response
				same. Problem is too many people, reduce immigration, reduce the need for building more homes, more offices, more school, bigger hospital, and then the need to have more people to service it all.	
IR(1) -13	Anonymous		Objecting	Giving a thing a label does not mean that landowners and developers will then build it if it is uneconomic to do so.	Comments noted, The proposed sites are considered viable for the development of affordable housing.
IR(1) -24	Anonymous		Objecting	Knock down old existing properties and build on them	Comments noted. The re-development of existing sites is already the primary source of new supply of homes.
IR(1) -7	Anonymous		Objecting	Providing affordable houses to buy is a very commendable idea but it is wide open to abuse on Jersey. What is wrong with renting. In many places in the world renting is the norm.	80% of the housing on the proposed rezoned sites is for social rent.
IR(1) -68	Anonymous		Objecting	What about there being no room in schools and social effects of existing local residents the whole area will be overcrowded and have a negative effect on area	The impact of proposed new residential development upon local infrastructure is considered as part of the site assessments for each location (see detailed site assessments at appendix B).
IR(1) -16	Anonymous		Supporting	A caveat is that any adopted scheme must be truly perpetual in relation to the housing stock itself. It is not sufficient to adopt schemes which are merely self-financing: ultimately, the problem is lack of available development sites. Selling stock and then having the proceeds available for reinvestment will not assist.	Comments noted
IR(1) -10	Anonymous		Supporting	every one needs the chance to buy the property of there choice as long as they can afford it with help is a good idea.	Comments noted
IR(1) -4	Anonymous		Supporting	only if it does not creep into green zone	Comments noted
IR(1) -114	Carlo Riva	The Association of Jersey Architects	Supporting	We feel that there is a fundamental difference in social rented housing and affordable homes for sale. This difference in tenure may express itself in the architecture and construction of the developments. The use of social rented housing is intense - every bedroom is used. This is not necessarily the case for affordable homes for sale. Such a distinction may manifest itself in more robust detailing for the social rented environment.  Furthermore the distinction between affordable social rental and open market rental is only 10% in rental terms. Is the term 'affordable' really appropriate in this instance?	Comments noted. The site assessments have already taken into account the potential housing mix and therefore likely densities for each site. It will be a requirement for developers/agents to work closely with the Department of the Environment and other key stake holders prior to the submission of a planning application in order to make sure that the housing scheme is fit for purpose and meets the needs of the plan.
				Is there also not a case to be made to identify KEY WORKER accommodation tied to a specific essential employer group?	The assessment of housing need already includes some elements of key worker demand. Further work on the demand for and provision of key worker accommodation is being undertaken by the Strategic Housing Unit.
				We fully support the proposal that developments zoned as affordable homes should remain as such. Perhaps a mechanism should be implemented to ensure that should a social rented development be sold off on the open market that such units are sold as reduced price, affordable homes.	The Strategic Housing Unit is working to develop legislation that will enable all affordable housing to remain affordable in perpetuity.
IR(1) -49	Chris Lamy		Supporting	Category A proposed housing comprising of social rent housing should not be mixed with purchase housing on the same site.	Comments noted, however a mix of housing tenures has worked successfully on other housing developments and is important for social cohesion.
IR(1) -17	Mr John Shenton		Supporting	One has no objections to the amending of the definition.	Comments noted
IR(1) -130	Mr Paul Harding	BDK Architects	Supporting	Supporting the proposed definition as written.	Comments noted
IR(1) -26	Mrs Judy Martin	States Member (St. Helier No.1)	Supporting	probably need more affordable housing to buy	Comments noted, however the tenure split is in line with current evidence of needs.
IR(1) -15	Mrs Rosemary		Supporting	However a committee of qualified people should assist the minister on matters	Comments noted. The Minister has the resources of the Department of the

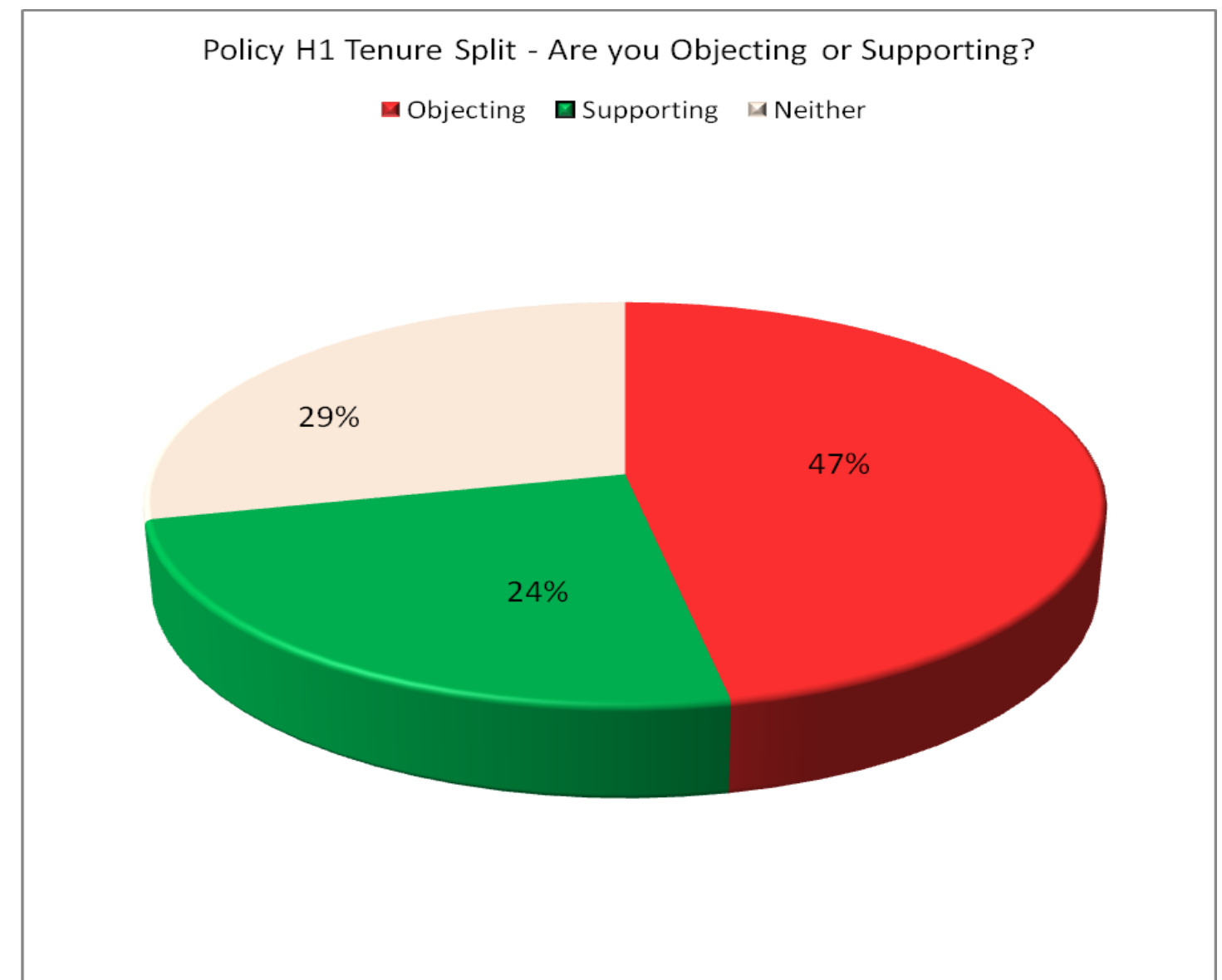
Ref	Name	Agent/ Organisation	Supporting/ Objecting	Reasons for answer	Minister's Response
	Evans			concerning design	Environment and, where relevant, the Jersey Architecture Commission, to provide him with advice on matters of design.

## Policy H1: Tenure split

The Minister for Planning and Environment is proposing to amend Policy H1 to include a number of proposed Category A housing on both States and privately owned sites. It is proposed that, to better meet current housing needs, the required tenure split on all of the private sites is 80% social rental and 20% affordable homes for purchase.

### Questionnaire consultation results

	% Total	% Answer	Count
<b>Number of rsponses</b>	22%	-	49
<b>Objecting</b>	11%	47%	23
<b>Supporting</b>	5%	24%	12
<b>Neither</b>	6%	29%	14
<b>[No response]</b>	78%	-	170
<b>Total</b>	<b>100%</b>	<b>100%</b>	<b>219</b>



## Policy H1 Tenure split - comments

Ref	Name	Agent/ Organisation	Supporting/ Objecting	Reasons for answer	Minister's Response
IR(1) -106	Deputy Richard Rondel	States Member (St. Helier No.3)	Neither	It is important, in my view, to encourage our young generation to be able to purchase their own homes	Comments noted. The proposed amendment seeks to enable some home ownership that is affordable to those on or below median incomes.
IR(1) -26	Mrs Judy Martin	States Member (St. Helier No.1)	Neither	the split needs to be looked at and all schemes need to be flexible to help as many people get on the ladder	To meet current housing needs, the required tenure split on all of the private sites proposed for rezoning is 80% social rental and 20% affordable homes for purchase. This is based on the latest evidence of need derived from the 2012 Housing Needs Survey which is informed by data derived from 2012 Housing Affordability in Jersey report and the 2012 Jersey House Price Index .
IR(1) -100	Mrs Stephanie Steedman		Neither	Ensure that the policy facilitates economics to deliver schemes.	Comment noted Most sites will have an agricultural land value and this will be considerably lower than the proposed affordable housing values and will encourage their viable development.
IR(1) -6	Anonymous		Neither	Another failed market intervention	Comment noted, but this policy will meet the needs of a large number of households in immediate need of affordable housing.
IR(1) -90	Jayn Johnson		Objecting	This imposed split is absurd and should be left to individual Parishes to decide	The proposed amendment is based on the latest evidence of need. The Minister is seeking to ensure that the Island's most pressing housing needs are met and that all provision contributes towards this need.
IR(1) -116	Karen Quenault		Objecting	You would have much less hope of being able to sell on a split of this size and therefore it would not boost the market, without selling more the market will remain the same but the need for more affordable housing will continue.	There is a well evidenced demand for affordable social rental and homes for purchase. It is considered unlikely that this proposed new supply will have a significant overall effect on the price of market (Category B) housing. The delivery of this potential additional supply of affordable housing needs to be seen as part of a suite of other affordable housing initiatives, such as the deposit loan scheme, managed by the Strategic Housing Unit.
IR(1) -5	L & M Howard		Objecting	I think the split should be nearer 50/50 to give developers more incentive to build in the first place.	Comment noted, but not evidenced by current needs.
IR(1) -176	Martin Whitley	La Comité du Commune Rurale St. Jean	Objecting	The 80%/20% split is too rigid and the Comité believes more flexibility should apply to site specific proposals. The split should be considered on a needs basis. The Comité believes that this may create zero value of developed land as there will be very little profit in any scheme going forward due to this potential mix. Therefore, it may mean that no affordable homes come forward in the private sector.	Comment noted, but not currently evidenced. The delivery of affordable housing is an Island wide issue and each site will need to be dealt with equitably. Most sites will have an agricultural land value and this will be considerably lower than the proposed affordable housing values and will encourage their viable development.
IR(1) -123	Mike Jackson		Objecting	Mixing the two can be socially challenging	Comments noted, but housing mixes have been successful on other housing developments and can be socially cohesive.
IR(1) -17	Mr John Shenton		Objecting	To create large developments that are 80% social rental and 20% affordable homes will only create further social issues. One can see the justification on smaller sites but just to expand this policy universally will create similar issues to those experienced on other large estates. One needs to expand the amount of homes in both categories but to spread these island wide. One needs to create more mixed communities in more parishes. The creation of large estate of this mix will have a detrimental effect on surrounding properties.	Comments noted, but housing mixes have been successful on other housing developments and can be socially cohesive.
IR(1) -32	Mr Michael Stein	MSPlanning Ltd	Objecting	Does not encourage homeownership. Split should be 55% ownership 45% social rented, as in last Island Plan.	Comment noted, but not evidenced by current needs.
IR(1) -122	Mr Peter Troy	Troy Developments Ltd	Objecting	Should be at least 50/50	Comment noted, but not evidenced by current needs.
IR(1) -108	Anonymous		Objecting	i don't think there should be a blanket tenure split. Each area should be split depending on the current tenures that already exist in the area. Each area should be	Comment noted, but not evidenced. The delivery of affordable housing is an Island wide issue and each site will need to be



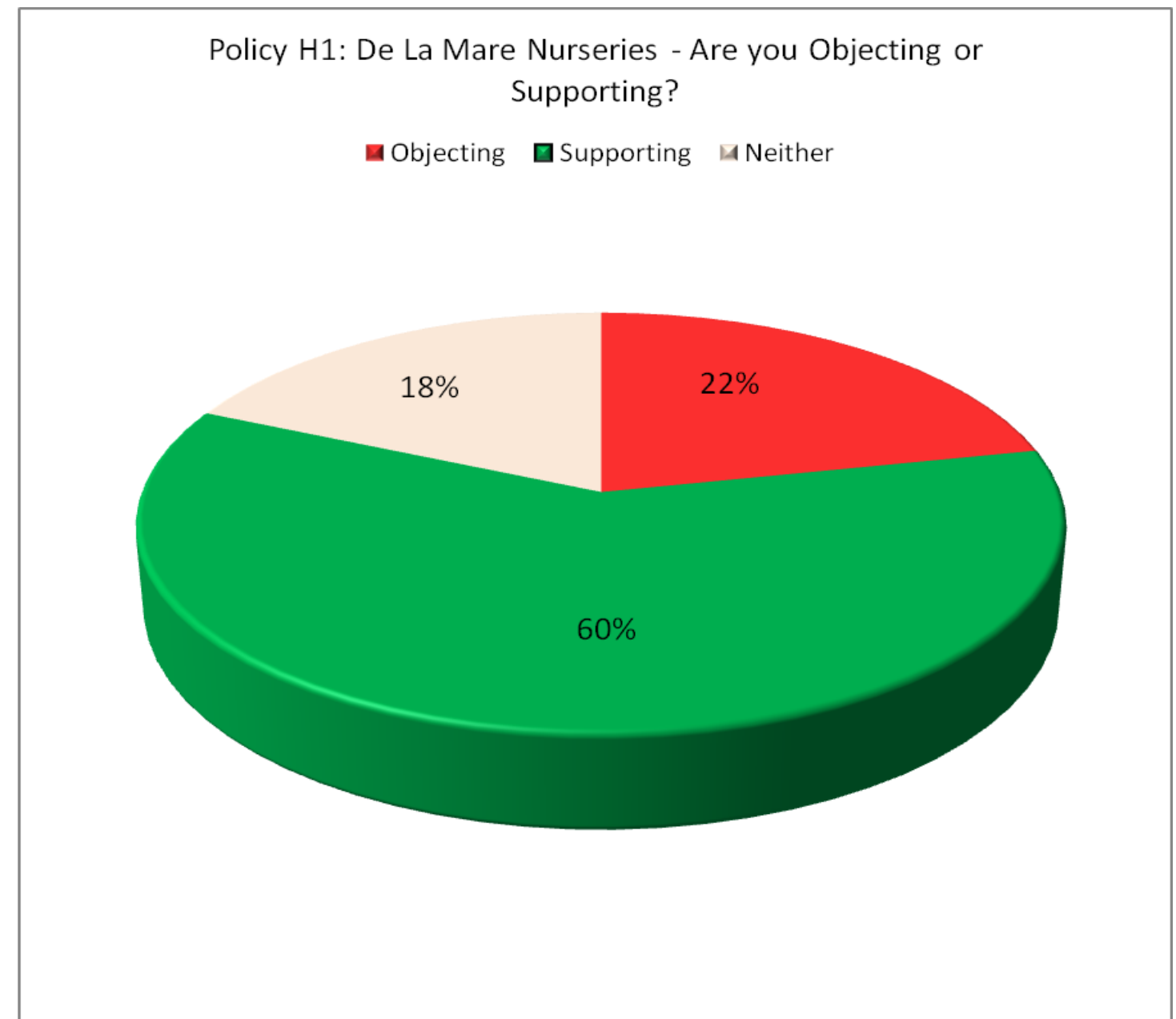
Ref	Name	Agent/ Organisation	Supporting/ Objecting	Reasons for answer	Minister's Response
				assessed on its own merits, and appropriate tenure splits decided upon depending on the demographics of that area.	dealt with equitably.
IR(1) -91	Anonymous		Objecting	Is changing the Plan the answer? Will it be changed again - may population is the real issue which is not being addressed	Comment noted. The Plan reflects current population strategy and evidence of needs.
IR(1) -22	Anonymous		Objecting	Keep rental & privately owned housing sites separate.	Comments noted, but housing mixes have been successful on other housing developments and can be socially cohesive.
IR(1) -13	Anonymous		Objecting	Whilst the States may decide they want to build more rental housing on their own land, this proposal will almost certainly make landowners less inclined to build in the first place. I thought the 45/55 split was more than adequate but the States decided that the 45% could apply to so-called Homebuy properties as well which was in hindsight quite a mistake, meaning a windfall for a few developers and buyers and a collapse in rental units.	Comment noted, but not evidenced by current needs.
IR(1) -114	Carlo Riva	The Association of Jersey Architects	Supporting	No comment	Noted
IR(1) -25	Carlo Riva	Riva Architects Ltd	Supporting	No comment	Noted
IR(1) -49	Chris Lamy		Supporting	The 20% to be similar to my reasoning to NE7-Green Zone. The 80% social rental to be only available to tenants who have lived in Jersey for at least TEN YEARS and have committed no criminal offenses during that period and must be on separate sites to the affordable purchase properties.	Occupancy of affordable homes will be controlled through the Housing Gateway.
IR(1) -30	Mr Martin Whitley		Supporting	The gateway assessments should have independent review and not just Government assessment.	Comment noted.
IR(1) -130	Mr Paul Harding	BDK Architects	Supporting	Supporting Policy H1 amendment as written.	Comment noted.
IR(1) -23	Mr Peter Thorne		Supporting	I support this proposal in principle. However, I would avoid putting the 80%/20% split into policy, as the needs are likely to change quite often. The split should be dealt with in supplementary planning guidance to avoid having to debate the split in the States on regular basis.	Comment noted, although the split is related to specific sites that are expected to be delivered in the short term and so the need for a more flexible longer-term approach is negated.
IR(1) -15	Mrs Rosemary Evans		Supporting	It would seem sensible	Comment noted

## Policy H1: De La Mare Nurseries, Grouville

The Minister for Planning and Environment is proposing to re-zone De La Mare Nurseries, Grouville for Category A affordable housing as part of the proposed revision of [policy H1](#).

### Questionnaire consultation results

	% Total	% Answer	Count
<b>Number of responses</b>	27%	-	60
<b>Objecting</b>	6%	22%	13
<b>Supporting</b>	16%	60%	36
<b>Neither</b>	5%	18%	11
<b>[No response]</b>	73%	-	159
<b>Total</b>	<b>100%</b>	<b>100%</b>	<b>219</b>



## Policy H1: De La Mare Nurseries, Grouville – comments

Ref	Name	Agent/ Organisation	Supporting/ Objecting	Reasons for answer	Minister's Response
IR(1) -18	Anonymous		Neither	N/A	
IR(1) -10	Anonymous		Neither	turn land back to agri use only	Comment noted.
IR(1) -177	Deputy John Le Fondré	States Member (St. Lawrence)	Neither	Provided this is supported by the Parish (Constable / Parish Assembly) and the Deputy, I can probably support the redevelopment of this glass house site.	Comment noted.
IR(1) -130	Mr Paul Harding	BDK Architects	Neither	We have no specific comments on the four sites (De La Mare Nurseries, Samarès Nurseries, Le Quesne Nurseries & Longueville Nurseries) proposed for rezoning as Category A Housing sites.	Comment noted.
				However we would point out that the proposed amendment to Green Zone Policy NE7, Policy numbers 15 & 16 as written would in future prevent other similar sites from being brought back into a useful purpose.	See response to IR(1) – 130 about Policy NE7
IR(1) -65	Anonymous		Objecting	the high density of housing in the area already	The Minister does consider that the density of housing in the area is high: the surrounding density of the built up area is approximately 10 dwellings per acre.
				the impact on traffic	The existing road network has adequate capacity and adequate visibility can be achieved for vehicle entering onto the highway. Whilst TTS have advised that development here may place increased reliance on the private car if the site is rezoned a contribution to support other transport modes will be sought from the developer.
				pressure on local resources such as schools	The current and future ability of local schools to accommodate anticipated demand for places is material and ESC has advised that there is capacity.
				the importance of maintaining green land - possibly for allotments	The Minister acknowledges the importance of protecting the countryside and has sought to identify those sites which have already been subject to some form of development, albeit for agricultural purposes, on the edge of the existing built-up area as having the potential to contribute to the Island's housing needs.
IR(1) -12	Anonymous		Objecting	NO MORE DEVELOPMENT ON GREEN FIELDS!!! REMOVE THE GLASS AND FARM THE LAND.	The Minister acknowledges the importance of protecting the countryside and has sought to identify those sites which have already been subject to some form of development, albeit for agricultural purposes, on the edge of the existing built-up area as having the potential to contribute to the Island's housing needs.
IR(1) -108	Anonymous		Objecting	Private planning applications have already been refused for this site.	Comment noted., however the previous proposals were for speculative open market housing, whereas this proposals is for affordable housing
IR(1) -87	Anonymous		Objecting	The report indicates no feasible treatment for the risk of irreversible damage to Grouville marshes, an important SSI on Jersey.	The site assessment at Appendix B of the Minister's proposed amendment acknowledges that the site is in close proximity to Grouville Marsh, albeit that the proposed housing site is smaller and further removed than the existing agricultural operation and may, therefore, provide an opportunity to reduce and provide a buffer for the marsh. The impact of any development on this site will need to be carefully researched and evaluated and adverse effect upon the site's ecological value avoided, mitigated or offset.
				The development at the old Jersey pottery site presumably has been taken into account as well when considering the impact on local infrastructure, particularly the traffic impact coming into St Helier as realistically nearly all residents are likely to be employed there?  The rezoning and development is based on a perceived need for more social housing. Jersey cannot afford on its present financial model to support the infrastructure requirements of building extra social housing, and suddenly discovering the existing infrastructure isn't fit. It is an unpalatable reality that not everybody who wants to live in Jersey can afford to. The only way for Jersey to balance its books is to accept this, rather than seek to accommodate more	The site assessment, at Appendix B of the proposed amendment, sets out the considerations relating to the potential impact of the development of the site upon the local infrastructure.

Ref	Name	Agent/ Organisation	Supporting/ Objecting	Reasons for answer	Minister's Response
				and more people who cannot afford the high cost of living.	
IR(1) -13	Anonymous		Objecting	These, like most glasshouse sites, were no doubt built with funds provided by Agricultural loans and grants on land which was in cultivation. The sites should therefore be returned to food production wherever possible.	The basis upon which the existing use of the site was funded is not material to consideration of its potential, in planning terms, to contribute towards the Island's housing needs. The Minister acknowledges the importance of protecting the countryside and safeguarding agricultural land but has sought to identify those sites which have already been subject to some form of development, albeit for agricultural purposes, on the edge of the existing built-up area as having the most potential to contribute to the Island's housing needs.
IR(1) -4	Anonymous		Objecting	This area has been allowed to decline knowing that it will get building permission	The site has a considerable planning history and permission for other forms of open market homes has not been secured.
IR(1) -116	Karen Quenault		Objecting	Reasons as stated for Policy GD2	Comment noted.
IR(1) -185	Mr Andrew Townsend		Objecting	<p>My comments relate to the proposed development of the De La Mare Nurseries site in Grouville, and in particular 2 issues, the form of the development and the intended use.</p> <p>In proposing the forthcoming road improvements at the junction just to the east of the site, TTS argued that La Ville Es Renauds has a distinct identity. This site forms the entrance to that area travelling from town, with Gorey Castle visible in the background, and it will be the single biggest development in the vicinity. The area outlined in red in the proposals document is therefore in my view the maximum area that should be developed, and even then it is important that it is handled sensitively and with the extensive landscaping proposed.</p> <p>Like all developments the eventual planning application must satisfy various Island Plan policies including GD1 and GD7 which require a development to be sympathetic to the character of the surrounding area. The yield stated in the proposed revision to the Island Plan must therefore be tested against these criteria before a definite number of units can be suggested with any confidence. To do otherwise would prejudice determination of the application.</p> <p>The area outlined in red appears to be around two and a half acres, less than the 3 acres stated and the proposed density would far exceed that of not only the least densely developed roads in the vicinity such as La Croix Crescent immediately across the road, but also more dense developments such as Clos Royale, Le Jardin Fleuri and Paddock End. This suggests that the density of family sized dwellings proposed, is not in keeping with the surrounding area and so not compliant with policies GD1 and GD7.</p>	<p>Policy GD3 of the 2011 Island Plan seeks to ensure that the highest reasonable density is achieved for all developments that is commensurate with good design.</p> <p>As stated at Appendix B, the site assessment have been undertaken thus far have been carried out to identify and consider the planning issues that are particular to each site and to provide a <i>potential indication</i> of housing yield: they are by no means definitive and, as stated, the actual number of homes on each site will be determined through the planning process having regard to all material planning considerations, such as GD1 and GD7.</p>
				The site assessment also notes the potential impact on the Grouville Marsh Ecological SSI, and drainage difficulties. The proposal is not supported by TTS Highways as it is considered poorly located for employment and secondary schools, and I would question the stated capacity of the primary school given that since the site was first considered, development has commenced on the construction of 62 units at the former Jersey Pottery site.	<p>The site assessment, at Appendix B of the proposed amendment, sets out the considerations relating to the potential impact of the development of the site upon the local infrastructure.</p> <p>The current and future ability of local schools to accommodate anticipated demand for places, particularly given other approvals for residential development in the area, is material and ESC has advised that there is capacity</p>



Ref	Name	Agent/ Organisation	Supporting/ Objecting	Reasons for answer	Minister's Response
				These issues together suggest that the site would be more appropriately developed wholly or primarily for over 55s housing, still providing new housing units (and also freeing up possibly under used larger units elsewhere), but significantly lessening the difficulties highlighted regarding work and school journeys, the SSI, drainage and education. Such units would also have lower requirements for car parking and gardens, enabling a reasonable density to be achieved without overdeveloping the site.	The proposed form of housing development is informed by the latest housing needs assessment. Occupancy of affordable homes will be controlled through the Housing Gateway but does not preclude occupancy by people aged over-55. It is relevant to note that there has been recent provision made in Grouville for over-55 accommodation at Rue de Maltiere.
IR(1) -8	Mr Bob Henkhuzens		Objecting	The site should remain for agricultural purposes only. If the owner no longer wishes to utilise greenhouses, then he should be obliged to not let them fall into dangerous disrepair; within, say, 3 years remove them; and then return the space to agricultural use for planting or for grazing.	The Minister acknowledges the importance of protecting the countryside and safeguarding agricultural land but has sought to identify those sites which have already been subject to some form of development, albeit for agricultural purposes, on the edge of the existing built-up area as having the most potential to contribute to the Island's housing needs..
				It is curious that the driver for the change is claimed to be a shortage of housing - a look at Friday's JEP will show pages and pages of houses and flats for sale.... The Island's government continues to fail to accept that the electorate are concerned about the increasing Island population - building more houses will not help to constrain this growth. Every piece of rural space that is lost will be lost forever. Furthermore for each piece that is lost, there will undoubtedly be a subsequent application to change the use of yet another piece of land next to one lost.	The decision to provide more affordable and social housing is a key action of the States Strategic Plan 2012. The latest evidence on affordability indicates that open market housing is beyond the reach of many people in Jersey (see: <a href="http://www.gov.je/Government/JerseyWorld/StatisticsUnit/Prices/Pages/HousingAffordability.aspx">http://www.gov.je/Government/JerseyWorld/StatisticsUnit/Prices/Pages/HousingAffordability.aspx</a> )
IR(1) -84	mr david dutson		Objecting	It is less than 2 years since the States debated and passed the Island Plan 2011. At that time the sites now submitted for re.zoning were either rejected or withdrawn. We were told that there would be no further building in the green zone other than in truly exceptional circumstances. The need for housing is insatiable with changing demographics and lifestyles even without population controls. Further building in the countryside will only increase the pressure on the Island's infrastructure.	The basis for the proposed amendment to the housing policies of 2011 Island Plan is set out in the Consultation Paper and is essentially brought to respond to changed circumstances and new data which requires that the Plan makes different provision to meet the need for affordable homes.
				Grouville school is already full with resulting chaos at home time and building many houses on the Jersey Potteries site will only exacerbate the situation. Prior to the 2011 Island Plan Transport and Technical Services carried out a studied the de La Mare site and concluded that it was not suitable for housing citing drainage and traffic problems amongst others. In my opinion the States should concentrate on re-invigorating St Helier where people can walk or cycle to work and where sites are becoming available through office migration or replacing other buildings such as the police station and possibly the hospital.	The site assessment, at Appendix B of the proposed amendment, sets out the considerations relating to the potential impact of the development of the site upon the local infrastructure. The current and future ability of local schools to accommodate anticipated demand for places, particularly given other approvals for residential development in the area, is material and ESC has advised that there is capacity. The thrust of the Spatial Strategy of the 2011 Island Plan remains unaltered by the Minister's proposed amendments such that most of the Island's development needs should be met from within the existing built-up area: the proposed rezoning of land would, in total, provide about 350 homes out of a total supply of over 3,500.
IR(1) -211	Mr Roy Smith		Objecting	I am disappointed at the timing of the proposed rezoning of this land given the current planning position and Royal Court appeal proceedings relating to the site - this concerning the refusal of an application submitted under the 2002 Island Plan to redevelop part of the site for 25 Category B dwellings and return the remainder of the site to open land. I am aggrieved that, in publicising this rezoning proposal, the Minister has not included an accompanying adequate explanation outlining recent and current planning circumstances relating to this site, to include (a) the findings of the Royal Court judgement (8 May 2012) which allowed our appeal, quashed the refusal decision and remitted the application back to the Minister for further required consideration; and (b) the current appeal proceedings which follow a further refusal by the Minister (March 2013) following the Court's remittal back.	The Minister has published his proposal to amend the Island Plan to help meet the existing need for affordable homes, which is acute and current. The site assessment for the de la Mare Nurseries, at appendix B, summarises the planning history of the site.

Ref	Name	Agent/ Organisation	Supporting/ Objecting	Reasons for answer	Minister's Response
				Notwithstanding that my application forming the subject of the appeal is for Category 'B' housing, and notwithstanding my belief that the proposal complies with the 2002 Island Plan under which the application was submitted and previously (unreasonably) determined, I have previously indicated my willingness to compromise by the offer of entering into a legal agreement that all dwellings would be for Category A housing, comprising a mix of first-time buyer and over 55's homes - this following discussions with and the support of the late Connétable and local Deputy. This offer was declined by the Minister but is still open.	As set out at Para. 6.13, the Minister is seeking to revise the definition of Category A affordable housing to better meet the need for truly affordable homes and to rezone the land, in accord with the proposed amendment at Policy H1, to help meet the Island's most pressing housing needs as evidenced by the latest data.
				Whilst I have no objections to the principle of a proposed rezoning of this land for housing, I consider the proposed rezoning specifically for the split of 80% social rented housing and 20% affordable homes for purchase is inappropriate and unreasonable given the recent and current planning circumstances relating to this site (these circumstances outlined under the separate heading below).  We would question whether the proposed rezoning for 80% social rented and 20% affordable homes is appropriate in this location and would suggest that the site would be far better suited for first time buyer and over 55 (parish) homes. This was endorsed by our compromise offer to planning and through our discussions with the Parish of Grouville.	Comments noted, but as set out at Para. 6.13, the Minister is seeking to revise the definition of Category A affordable housing to better meet the need for truly affordable homes and to rezone the land, in accord with the proposed amendment at Policy H1, to help meet the Island's most pressing housing needs as evidenced by the latest data.
				In the event of my suggestion of holding further discussions being declined, then given all the recent circumstances of the case, I would have to seriously re-consider my position as to the future sale of the proposed site and would reserve the right to vigorously challenge any compulsory purchase proceedings. I hope States members will understand my position on further reading the following background to this case.	Comment noted. Any compulsory purchase proceedings would follow the prescribed process.
IR(1) -16	Anonymous		Supporting	Each site should have been included in the original 2011 island plan as each development was necessary to achieve the affordable housing objective. The 2011 plan ended up being a political fudge - the published solution to the identified policy objective was always bound to fail.  As was apparent from the draft 2011 plan, the identified sites need to be developed or the affordable housing objective will not be met. Ultimately there will always be objections made to a proposed development regardless of its location. Objectors will raise any number of arguments but these always come back to "there is too much building in the island" and/or "there is too much building in my Parish or near my own home".  Each site survey considered the real issues involved (traffic, sewerage, visual impact, alternative land use etc) and concluded, subject to planning conditions, that all of these could be adequately addressed.	Comment noted.
IR(1) -114	Carlo Riva	The Association of Jersey Architects	Supporting	No comment	Comment noted.
IR(1) -25	Carlo Riva	Riva Architects Ltd	Supporting	No comment	Comment noted.
IR(1) -49	Chris Lamy		Supporting	Supporting as affordable purchase housing.	Comment noted.
IR(1) -45	J Le Main		Supporting	This is already built on and therefore ripe for development of this kind.	Comment noted.
IR(1) -5	L & M Howard		Supporting	It was included in the 2011 Island Plan Review and bafflingly rejected by the	Comment noted.

Ref	Name	Agent/ Organisation	Supporting/ Objecting	Reasons for answer	Minister's Response
				States.	
IR(1) -33	Mr Gary Le Brocq		Supporting	This land is already built on.	Comment noted.
IR(1) -67	Mr James Godfrey	Royal Jersey Agricultural & Horticultural Society	Supporting	This is an obvious site for development especially if the remainder of the site is returned to agriculture.	Comment noted.
IR(1) -17	Mr John Shenton		Supporting	A development of this size should have a greater mix of properties in relation to social rental / purchase and the over 55's. The area is relatively undeveloped	Comment noted.. There is the potential within 80/20 tenure split to provide for a range of age groups who qualify through the Housing Gateway.
IR(1) -32	Mr Michael Stein	MSPlanning Ltd	Supporting	As a derelict and redundant glasshouse on the edge of a built Up Area, it makes sense to develop. The development site could however be larger, without any greater impact.	Comment noted.. This site is in close proximity to Grouville Marsh, albeit that the proposed housing site is smaller and further removed than the existing agricultural operation. It is considered that the area between the proposed housing site and the marsh should be restored to agricultural use: any proposal to increase the size of the site would require further review and careful consideration.
IR(1) -190	Mr Peter Falle	Parish of Grouville	Supporting	Grouville has been extremely disappointed with the outcome of the development of field 148 in Grouville, which was the proposal to create a number of sheltered housing units. This development has now been acquired by a Housing Trust, resulting in the Parish being unable to allocate units to Parishioners over the age of 55. We therefore confirm that it was always the late Connétable Dan Murphy's view that the Parish should be supportive in accommodating both over 55's and first time buyer initiatives and feel that this use of the De La Mare Nursery site would be an extremely sensible way for this to be achieved.  My response has been made with the full support of senior Parish Officials and respects the established view of both the late Connétable Murphy and Parish of Grouville generally. We therefore hope that a sensible use of the site with the above suggested criteria may come to fruition.	The Minister for Planning and Environment is concerned to ensure that residential development contributes towards the Island's pressing need for affordable homes as proposed by his amendment to the 2011 Island Plan: this changes the definition of Cat A homes and access to them, which is based on people's income level (i.e. median income or below), and which is managed by the Strategic Housing Unit by assessment through the Housing Gateway.  This does not preclude the occupation of any homes by parishioners or those with connections to the parish, or by people over-55, but only where they qualify through the Housing Gateway operated by the Strategic Housing Unit.
IR(1) -23	Mr Peter Thorne		Supporting	I support this development of a 'brownfield' site, which should have been approved some time ago.	Comment noted.
IR(1) -159	Mr Roy Smith	MSPlanning Ltd	Supporting	In light of the greater demand for housing that is anticipated to be needed over the plan period (to 2020) as put in the Pioneer Report (September 2013) than that which is predicted to be needed by Interim Plan, and; given the history of under-provision by successive Island Plans (ie 1987, 2002 and 2011 Island Plans): it would make sense to increase the developable area of the above site to include all the already-developed land on this site, including the existing glasshouses to the north and west, as per the attached plan. The extent of the site, as proposed by the Minister, is shown by the dotted line.  Our proposal would almost double the size of the site, but without any greater impact when viewed from the public realm.  This request, however, in no way affects the owner's appeal to the Royal Court against the Minister's latest refusal of planning permission for housing on this site, but which is to be stayed pending further discussions and developments with the Planning Department and the Minister in connection with his proposal to re-zone the site for affordable housing in the Interim Island Plan.	Comment noted.. This site is in close proximity to Grouville Marsh, albeit that the proposed housing site is smaller and further removed than the existing agricultural operation. It is considered that the area between the proposed housing site and the marsh should be restored to agricultural use: any proposal to increase the size of the site would require further review and careful consideration.
IR(1) -15	Mrs Rosemary Evans		Supporting	It seems sensible	Comment noted.
IR(1) -100	Mrs Stephanie Steedman		Supporting	As far as I am aware Grouville has no sites identified for affordable housing. If sites like these are going to be brought forward, as a balance why not require significant improvements to sustainable transport provision as part of	Comment noted.. Whilst TTS have advised that development here may place increased reliance on the private car if the site is rezoned a contribution to support other transport modes will be sought from the

Ref	Name	Agent/ Organisation	Supporting/ Objecting	Reasons for answer	Minister's Response
				any potential redevelopment proposals? Include a reasonably sized bus shelter to encourage the residents living within walking distance to commute to town by bus?	developer.
IR(1) -48	President Graham J Le Lay	JERSEY FARMERS' UNION	Supporting	<p>With the demise of a vast proportion of the Horticultural Industry several years ago we would not object to the re-zoning of the following redundant glasshouse sites for Category "A" affordable housing providing the proposed change to Policy H5 is adhered to.</p> <p>We feel that redundant glasshouse sites should be used for housing development prior to any green field sites being utilised. This will obviously improve the appearance of the countryside and the environment for the benefit of the Island and the Tourism Industry.</p>	Comment noted.
IR(1) -7	Anonymous			Yet more green space disappearing.	The Minister acknowledges the importance of protecting the countryside and safeguarding agricultural land but has sought to identify those sites which have already been subject to some form of development, albeit for agricultural purposes, on the edge of the existing built-up area as having the most potential to contribute to the Island's housing needs.

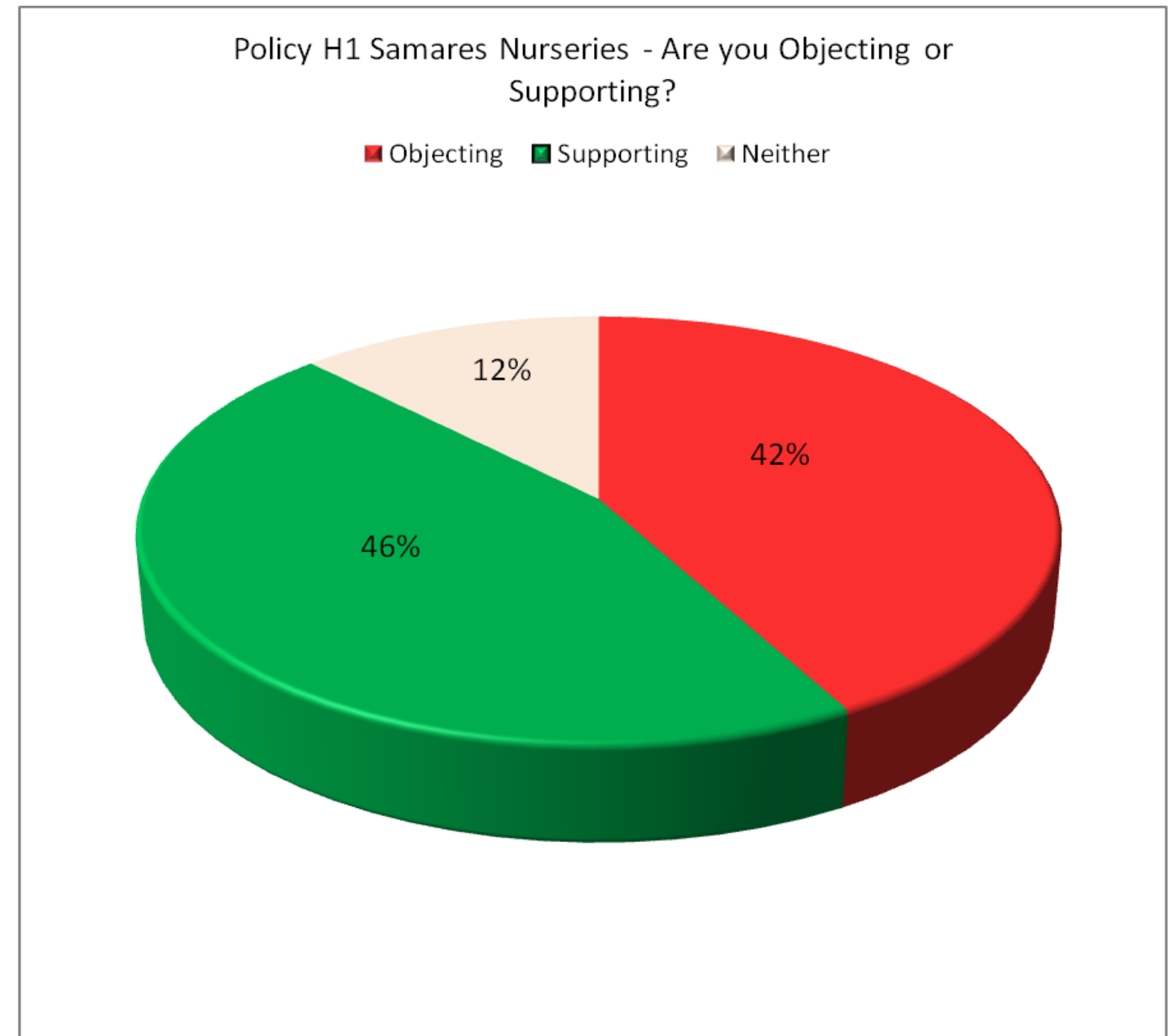


## Policy H1 Samarès Nurseries, St Clement

The Minister for Planning and Environment is proposing to re-zone Samarès Nurseries, St. Clement for Category A affordable housing as part of the proposed revision of [policy H1](#).

### Questionnaire consultation results

	% Total	% Answer	Count
<b>Number of responses</b>	26%	-	57
<b>Objecting</b>	11%	42%	24
<b>Supporting</b>	12%	46%	26
<b>Neither</b>	3%	12%	7
<b>[No response]</b>	74%	-	162
<b>Total</b>	<b>100%</b>	<b>100%</b>	<b>219</b>



## Policy H1 Samarès Nurseries, St Clement

Ref	Name	Agent/ Organisation	Supporting/ Objecting	Reasons for answer	Minister's Response
IR(1) -65	Anonymous		Neither	But consider 1) the high density of housing in the area	The current redevelopment of Le Squez is higher than the original sub-urban density of the 1960's, however it is consistent with current planning policy: Policy GD3 of the 2011 Island Plan seeks to ensure that the highest reasonable density is achieved for all developments that is commensurate with good design.
				the impact on traffic	The use of the site for housing is supported by TTS: the site is well served by public transport and facilities and amenities are within reasonable walking and cycling distance. Potential vehicular access and egress can be achieved from both La Grande Route de St Clement and Le Squez.
				pressure on local resources such as schools	The current and future ability of local schools to accommodate anticipated demand for places is material and ESC has advised that there is capacity.
				the importance of maintaining green land - possibly for allotments	The Minister acknowledges the importance of protecting the countryside and has sought to identify those sites which have already been subject to some form of development, albeit for agricultural purposes, on the edge of the existing built-up area as having the potential to contribute to the Island's housing needs.
IR(1) -177	Deputy John Le Fondré	States Member (St. Lawrence)	Neither	Provided this is supported by the Parish (Constable / Parish Assembly) and the Deputies, I can probably support the redevelopment of this glass house site. However I note that previously St Clement have been strongly of the view that they have had sufficient large scale development in the Parish.	Comment noted.
IR(1) -67	Mr James Godfrey	Royal Jersey Agricultural & Horticultural Society	Neither	Not all the site should be developed.	Comment noted.
IR(1) -130	Mr Paul Harding	BDK Architects	Neither	We have no specific comments on the four sites (De La Mare Nurseries, Samarès Nurseries, Le Quesne Nurseries & Longueville Nurseries) proposed for rezoning as Category A Housing sites.	Comment noted.'
				However we would point out that the proposed amendment to Green Zone Policy NE7, Policy numbers 15 & 16 as written would in future prevent other similar sites from being brought back into a useful purpose.	See response to IR(1) – 130 about Policy NE7
IR(1) -4	Anonymous		Objecting	again we are encroaching into the countryside	The Minister acknowledges the importance of protecting the countryside and has sought to identify those sites which have already been subject to some form of development, albeit for agricultural purposes, on the edge of the existing built-up area as having the potential to contribute to the Island's housing needs.
IR(1) -39	Anonymous		Objecting	agricultural land	The Minister acknowledges the importance of protecting the countryside and has sought to identify those sites which have already been subject to some form of development, albeit for agricultural purposes, on the edge of the existing built-up area as having the potential to contribute to the Island's housing needs.
IR(1) -12	Anonymous		Objecting	no MORE DEVELOPMENT	The Minister acknowledges the importance of protecting the countryside and has sought to identify those sites which have already been subject to some form of development, albeit for agricultural purposes, on the edge of the existing built-up area as having the potential to contribute to the Island's housing needs.
IR(1) -13	Anonymous		Objecting	See my previous comments on glasshouse sites.	The Minister acknowledges the importance of protecting the countryside and has sought to identify those sites which have already been subject to some form of development, albeit for agricultural purposes, on the edge of the existing built-up area as having the potential to contribute to the Island's housing needs.
IR(1) -108	Anonymous		Objecting	St Clement has undergone a lot of new development in recent years. There is a disproportionate amount of proposed new development in this Parish compared to the rest of the Island. It is important that the remaining green	The Minister acknowledges the importance of protecting the countryside and has sought to identify those sites which have already been subject to some form of development, albeit for agricultural purposes, on the edge of the existing built-up area as having the potential to

Ref	Name	Agent/ Organisation	Supporting/ Objecting	Reasons for answer	Minister's Response
				spaces in this Parish are preserved.	contribute to the Island's housing needs.
IR(1) -24	Anonymous		Objecting	St Clement is already to built up	The Minister acknowledges the importance of protecting the countryside and has sought to identify those sites which have already been subject to some form of development, albeit for agricultural purposes, on the edge of the existing built-up area as having the potential to contribute to the Island's housing needs.
IR(1) -20	Anonymous		Objecting	this will make an already overpopulated area more so	Comment noted.
IR(1) -6	Anonymous		Objecting	Too large an area with traffic issues	The use of the site for housing is supported by TTS: the site is well served by public transport and facilities and amenities are within reasonable walking and cycling distance. Potential vehicular access and egress can be achieved from both La Grande Route de St Clement and Le Squez.
IR(1) -124	Connétable Len Norman	States Member (Parish of St. Clement)	Objecting	<p>The following is an extract relating to both St Clement proposed rezoned sites Samarès and Le Quesne Nurseries, St Clément</p> <p>Both of these areas are in the Green Zone, the Zone which offers the highest protection against development.</p> <p>The first-mentioned site also has, I understand, "agricultural conditions" attached, which I am surprised your Department has not enforced, bearing in mind the current high demand for agricultural land.</p> <p>Samarès Nursery was afforded Green Zone status only two years ago by a unanimous vote of the States, effectively on the proposition of the now Chief Minister, Senator Ian Gorst. He was a St Clément Deputy at that time. It is incredible that we are even contemplating a change at this stage, when even the housing need remains unproven as I shall show later.</p> <p>The Le Quesne field has been in the Green Zone even longer. And what you should be asking yourself, is if these sites did not have glasshouses on them, and if their owners had not neglected them and let them get into a ruinous state of repair, would you be even considering a rezoning?</p> <p>Looking at the location plan of Le Quesne Nursery it is clear that this is a monstrous incursion into the Green Zone, a wedge of massive proportions into a neatly rectangular set of open fields. How will it be possible to resist development on the fields to the south, north and east of this proposed incursion in the future?</p>	The Minister acknowledges the importance of protecting the countryside and has sought to identify those sites which have already been subject to some form of development, albeit for agricultural purposes, on the edge of the existing built-up area as having the potential to contribute to the Island's housing needs.
				<p>You can be in no doubt that many residents of St Clément are becoming more and more distressed by the development that is occurring in the Parish, and even more so by the totally inappropriate style of development that is being permitted in some cases. La Rue de Jambart is a very sad example of a traditional country lane being ruined by urban standards being imposed on a rural community.</p> <p>St Clément is often spoken about these days as an urban Parish. Despite the excessive development that has taken place within its boundaries over the past years, it remains culturally and, in much of its area, physically rural. I look to you to help keep it that way.</p> <p>I ask you to remove Samarès Nursery and Le Quesne Nursery from the list of potential sites for rezoning on the grounds that it is not necessary, it is inappropriate and it would overburden a Parish which has already contributed more than its fair share of the housing provision for the Jersey population. More suitable and appropriate uses could be found for the sites, as I show later in this letter.</p>	The site assessment, at Appendix B of the proposed amendment, sets out the considerations relating to the potential impact of the development of these sites upon the local infrastructure. The thrust of the Spatial Strategy of the 2011 Island Plan remains unaltered by the Minister's proposed amendments such that most of the Island's development needs should be met from within the existing built-up area: those sites identified for the provision of affordable housing in St. Clement are well-related to the existing built-up area and, in terms of the rezoning of land, offer the most sustainable opportunities for development when viewed from an island-wide perspective.
IR(1) -116	Karen Quenault		Objecting	Reasons stated for Policy GD2	Comment noted.

Ref	Name	Agent/ Organisation	Supporting/ Objecting	Reasons for answer	Minister's Response
IR(1) -199	M.J King	MANOR CLOSE PROPERTY OWNERS ASSOCIATION	Objecting	It will be well recorded in your files that we have in the past expressed, on a number of occasions, our strong opposition to Samarès Nurseries being developed for housing. There are several reasons for this:- St. Clement is a small parish and is already overdeveloped. The roads are packed with cars and other vehicles. There are times now when one has to avoid leaving home because of long traffic queues. What will it be like when houses are build on this site? The number of cars will be enormous. Will there be another exit/entrance other than La Grand Route de St. Clement?	The site assessment, at Appendix B of the proposed amendment, sets out the considerations relating to the potential impact of the development of this site upon the local infrastructure including that relating to transport and travel.  The use of the site for housing is supported by TTS: the site is well served by public transport and facilities and amenities are within reasonable walking and cycling distance. Potential vehicular access and egress can be achieved from both La Grande Route de St Clement and Le Squez.
				We believe that the concerns of the people already living here should be taken into consideration. The value of the houses backing on to the nursery, and probably others will be devalued.  Privacy for most people is important and this will be compromised depending on what sort of buildings are sanctioned. Many originally chose to live here because the Close is reasonably quiet and peaceful. Judging from other developments in the Island every available inch will be utilised. Where will the access road be built? Will this be near to the back gardens of this close, with all the resulting noise? Will the houses be overlooked?	Policy GD3 of the 2011 Island Plan seeks to ensure that the highest reasonable density is achieved for all developments that is commensurate with good design.  As stated at Appendix B, the site assessment have been undertaken thus far have been carried out to identify and consider the planning issues that are particular to each site and to provide a <i>potential indication</i> of housing yield: they are by no means definitive and, as stated, the actual number, size and types of homes on each site will be determined through the planning process having regard to all material planning considerations, such as GD1 and GD7 which deal with issues of design and the protection of the amenities of adjacent residents.
				Within the last two years the refurbishment of part of Le Squez Estate has taken place. The original plans showed that the area immediately at the end of Manor Close would be used for houses. This was thought reasonable. However much to our dismay as the building progressed it was obvious that it was not going to be houses but high rise flats. It seems no publicity was made regarding the change to the plans. We consider that this was grossly unfair on those living nearby in the Close. The Constable and Deputy Gorst agreed with this.  Would not the correct way have been to have polite conversation with the nearby residents? The question that residents now have is that should this development be passed what are the chances that we would have a similar situation at the back of the Close?	If the site is rezoned by the States, a planning application will ultimately be submitted.  Any new or amended planning applications are advertised and details of the proposals are open to public scrutiny. Issues such as vehicular access, overlooking, etc are material considerations in the determination of such application.
				As well as Manor Close, this development affects many other properties along Le Grande Route de St. Clement. We feel strongly that the Island Plan should remain unchanged as far as Samarès Nurseries is concerned and remain a brown site.	Comments noted.
IR(1) -8	Mr Bob Henkhuzens		Objecting	The site should remain for agricultural purposes only.	The Minister acknowledges the importance of protecting the countryside and safeguarding agricultural land but has sought to identify those sites which have already been subject to some form of development, albeit for agricultural purposes, on the edge of the existing built-up area as having the most potential to contribute to the Island's housing needs..
				It is curious that the driver for the change is claimed to be a shortage of housing - a look at Friday's JEP will show pages and pages of houses and flats for sale.... The Island's government continues to fail to accept that the electorate are concerned about the increasing Island population - building more houses will not help to constrain this growth. Every piece of rural space that is lost will be lost forever. Furthermore for each piece that is lost, there will undoubtedly be a subsequent application to change the use of yet another piece of land next to one lost.	The decision to provide more affordable and social housing is a key action of the States Strategic Plan 2012.  The latest evidence on affordability indicates that open market housing is beyond the reach of many people in Jersey (see: <a href="http://www.gov.je/Government/JerseyWorld/StatisticsUnit/Prices/Pages/HousingAffordability.aspx">http://www.gov.je/Government/JerseyWorld/StatisticsUnit/Prices/Pages/HousingAffordability.aspx</a> )
IR(1) -14	Mr Ian Bromley		Objecting	Low level land, vulnerable to flooding.  Filling this huge area with housing is going overload St Clement Parish with even more traffic. Large access roads will be needed somewhere.  The quality of life in this island is rapidly being eroded by ridiculous schemes such as this. Politicians should be considering a better immigration control policy if they want to make a name for themselves.	The site assessment, at Appendix B of the proposed amendment, sets out the considerations relating to the potential impact of the development of this site upon the local infrastructure including that relating to the need to address drainage issues. The developer of the site, should it be rezoned, will be required to ensure that the local infrastructure is enhanced in order to deal with existing issues and to accommodate the requirement for increased foul and surface water drainage capacity.  The use of the site for housing is supported by TTS: the site is well served by public transport and



Ref	Name	Agent/ Organisation	Supporting/ Objecting	Reasons for answer	Minister's Response
					facilities and amenities are within reasonable walking and cycling distance. Potential vehicular access and egress can be achieved from both La Grande Route de St Clement and Le Squez. The quality of life for those in inadequate housing accommodation is poor and the provision of more affordable and social housing is a key action of the States Strategic Plan 2012.
IR(1) -17	Mr John Shenton		Objecting	<p>The size of the proposed development is too large for the area given the number of other social housing in the area.</p> <p>It is difficult to see the justification for developing all the land as it is clear that the land to the east is not glasshousing but water storage that could be returned to agricultural use.</p> <p>It seems a little immoral to allow residential development on an obviously neglected agricultural site. Consideration should be given to forcing the site to be retained for agriculture to act as a disincentive to other who wish to allow their properties to fall into disrepair in the hope of a large pay day.</p>	<p>Comments noted.</p> <p>The Minister acknowledges the importance of protecting the countryside and safeguarding agricultural land but has sought to identify those sites which have already been subject to some form of development, albeit for agricultural purposes, on the edge of the existing built-up area as having the most potential to contribute to the Island's housing needs..</p>
				<p>Unlike the proposed development at De La Mare Nurseries there is poor access to the main road and already there is traffic congestion.</p> <p>Given the lack of amenities and access the site if development is the preferred option maybe a smaller development for the over 55's with the emphasis on community and for first time buyers, may go some way to addressing the disproportionate amount of social housing already in the parish.</p>	<p>The use of the site for housing is supported by TTS: the site is well served by public transport and facilities and amenities are within reasonable walking and cycling distance. Potential vehicular access and egress can be achieved from both La Grande Route de St Clement and Le Squez. The decision to provide more affordable and social housing is a key action of the States Strategic Plan 2012.</p>
IR(1) -200	Mrs T Bromley		Objecting	<p>I began writing this letter to you from my home on La Grande Route de St Clement on one of the warmest days of the year. Nearly all the windows were closed to keep out the constant traffic noise that begins around 6 am and continues until well into the evening. At the very busiest times cars pass every second. We have a lovely, little garden but we do not sit in it; the continual sound of cars, lorries and motorcycles is certainly not relaxing nor conducive to conversation. My reason for writing is that I am concerned about the proposed development at Samarès Nurseries. I realise something needs to be done about the site but would suggest that a large housing development is not appropriate for the area. It may have low visual impact but the increasing number of cars it will bring to the area will have a negative impact and make the roads even busier and noisier than they are now - and more dangerous. When you live along this road you are aware how little the 30mph speed is regarded.</p> <p>The land around Samarès Manor is marsh land and from time to time, heavy rain causes flooding. Just outside our home the drains are unable to cope with copious amounts of rain and the build up of water means that our roadside window is washed every time a heavy vehicle passes by. New homes require a certain number of parking spaces, as well as toilets, baths and showers, putting a burden on infrastructure that will undoubtedly cause problems ... little Maupertuis Lane has suffered collapse and had to be closed for many weeks for repairs, in part due to the increasing development around it and the extra traffic on it.</p>	<p>The site assessment, at Appendix B of the proposed amendment, sets out the considerations relating to the potential impact of the development of this site upon the local infrastructure including that relating to the need to address travel, transport and drainage issues.</p> <p>The use of the site for housing is supported by TTS: the site is well served by public transport and facilities and amenities are within reasonable walking and cycling distance.</p> <p>Potential vehicular access and egress can be achieved from both La Grande Route de St Clement and Le Squez.</p> <p>The developer of the site, should it be rezoned, will be required to ensure that the local infrastructure is enhanced in order to deal with existing issues and to accommodate the requirement for increased foul and surface water drainage capacity.</p> <p>A site of this scale would also be required to provide communal open space which could include provision for children's play and also possibly allotments.</p>
				<p>I have been trying to imagine alternatives and find myself wishing that some community building (like Eastern Good Companions) could be built on the land with a garden and adequate parking together with allotments and children's play areas. I shall be very grateful, therefore, if you will consider the negative impact on the environment that more houses and increased traffic will have on this area.</p>	<p>The provision of other community facilities on the site would need to ensure that the overall yield of affordable homes is not adversely affected. This might involve the provision of affordable homes elsewhere to offset any potential loss.</p>
IR(1) -184	Richie Griffiths		Objecting	<p>Having read the 2011 Island Plan: Interim Review (#1) I must confess I am staggered to see that yet again St. Clement is being earmarked to meet the housing needs of the island. May I just take this opportunity to say that I</p>	<p>The site assessment, at Appendix B of the proposed amendment, sets out the considerations relating to the potential impact of the development of these sites upon the local infrastructure.</p>

Ref	Name	Agent/ Organisation	Supporting/ Objecting	Reasons for answer	Minister's Response
				<p>believe that other parishes should be genuinely considered as St Clement in my opinion is already creaking under the weight of its existing parishioners. We are the smallest Parish in the Island and we are the second most densely populated with 2,142 islanders per square Km (as per the 2011 census) which I suspect has now increased further. We are currently 9% of the Island's population and the infrastructure is under huge pressure with too much traffic, too much housing and our schools cannot cope with the children in catchment.</p> <p>There must be other areas on the circa 45 square miles outside of our Parish that can be used for housing whatever the category. There are many parishes that enjoy the luxury of less than a 5% weighting of the population, almost half of that of St. Clement, with density of population at significantly lower levels and in some cases 8 times less!!</p> <p>I think it is about high time that the other parishes start to shoulder the burden of our ballooning population and urgent action is required before St. Clement is completely.</p>	The thrust of the Spatial Strategy of the 2011 Island Plan remains unaltered by the Minister's proposed amendments such that most of the Island's development needs should be met from within the existing built-up area: those sites identified for the provision of affordable housing in St. Clement are well-related to the existing built-up area and, in terms of the rezoning of land, offer the most sustainable opportunities for development when viewed from an island-wide perspective.
IR(1) -183	Rosemary Marr		Objecting	<p>I want to register my opposition to the proposal to amend the Island Plan so that 2 Glasshouse sites(Samarès Nurseries and Le Quesne Nurseries) in St Clement are rezoned for the purpose of building affordable housing.</p> <p>St Clement is the smallest Parish by area and has already had more than its fair share of Social and private housing . I am pleased there is to be a public meeting in the Parish in order to address our concerns to the Plannjng Minister at which I suspect there will be some strong opposition.</p>	<p>The site assessment, at Appendix B of the proposed amendment, sets out the considerations relating to the potential impact of the development of these sites upon the local infrastructure.</p> <p>The thrust of the Spatial Strategy of the 2011 Island Plan remains unaltered by the Minister's proposed amendments such that most of the Island's development needs should be met from within the existing built-up area: those sites identified for the provision of affordable housing in St. Clement are well-related to the existing built-up area and, in terms of the rezoning of land, offer the most sustainable opportunities for development when viewed from an island-wide perspective.</p>
IR(1) -188	Sally McCallum		Objecting	<p>I wish to lodge my objection to the proposed development of social housing on the former Samarès Nurseries site located on La Grande Route de St Clement. I reside along this road and my property backs directly onto the former reservoir serving the former nursery.</p> <p>The building of circa 200 houses will obviously have a detrimental impact on the surrounding area, cutting out one of the very few areas in St Clement that hasn't been built on. It will obviously impact on what is already an extremely busy road, will put pressure on the sewer systems - we've already had 2 collapse in the surrounding area - and also increase the intake for schools in the area.</p> <p>St Clement is the smallest parish in the island and is also the most densely populated and I feel that further housing on this scale is unfair on an already bulging residential area. I will be attending the meeting at the Parish Hall on 15 October to voice mine and many others concerns.</p>	<p>The site assessment, at Appendix B of the proposed amendment, sets out the considerations relating to the potential impact of the development of these sites upon the local infrastructure.</p> <p>The thrust of the Spatial Strategy of the 2011 Island Plan remains unaltered by the Minister's proposed amendments such that most of the Island's development needs should be met from within the existing built-up area: those sites identified for the provision of affordable housing in St. Clement are well-related to the existing built-up area and, in terms of the rezoning of land, offer the most sustainable opportunities for development when viewed from an island-wide perspective.</p>
IR(1) -121	Susie Pinel	States Member (St. Clement)	Objecting	<p>Whilst understanding the need for social rental and affordable housing purchase, there are grave concerns about the infrastructure of this, already, densely populated area, notably road access and schools.</p>	The site assessment, at Appendix B of the proposed amendment, sets out the considerations relating to the potential impact of the development of this site upon the local infrastructure.
IR(1) -16	Anonymous		Supporting	<p>Each site should have been included in the original 2011 island plan as each development was necessary to achieve the affordable housing objective. The 2011 plan ended up being a political fudge - the published solution to the identified policy objective was always bound to fail.</p> <p>As was apparent from the draft 2011 plan, the identified sites need to be developed or the affordable housing objective will not be met. Ultimately there will always be objections made to a proposed development regardless of its location. Objectors will raise any number of arguments but these always come back to "there is too much building in the island" and/or "there is too much building in my Parish or near my own home".</p> <p>Each site survey considered the real issues involved (traffic, sewerage, visual impact, alternative land use etc) and concluded, subject to planning conditions, that all of these could be adequately addressed.</p>	Comment noted.

Ref	Name	Agent/ Organisation	Supporting/ Objecting	Reasons for answer	Minister's Response
IR(1) -114	Carlo Riva	The Association of Jersey Architects	Supporting	No comment	Comment noted.
IR(1) -25	Carlo Riva	Riva Architects Ltd	Supporting	No comment	Comment noted.
IR(1) -49	Chris Lamy		Supporting	Supporting as a site for social housing.	Comment noted.
IR(1) -45	J Le Main		Supporting	As with the previous site, this is already built on and is therefore logical for development.	Comment noted.
IR(1) -5	L & M Howard		Supporting	It was included in the 2011 Island Plan review and rejected for no good reason; it should be reinstated.	Comment noted.
IR(1) -176	Martin Whitley	La Comité du Commune Rurale St. Jean	Supporting	The proposed development of former nursery sites for category A housing is a sensible use of land.	Comment noted.
IR(1) -33	Mr Gary Le Brocq		Supporting	This land is already built on.	Comment noted.
IR(1) -32	Mr Michael Stein	MSPlanning Ltd	Supporting	By far the best site. can accommodate a large proportion of the need. little impact on the environment. Most sustainable site.	Comment noted.
IR(1) -140	Mr N Vibert & Mrs S Mathew	MSPlanning Ltd	Supporting	<p>Conclusion (extract from attached report by MS Planning) There is little doubt that Samarès Nurseries is the best site in the island for affordable housing both in terms of its overall suitability and because it will be able to deliver a significant proportion of the affordable housing that is required within a relatively short timeframe.</p> <p>Four bodies of work carried out in respect of this site, namely a Transport Appraisal, a Phase 1 Geotechnical and Geo-environmental Desk Study Report, a Noise Assessment and an Ecology Phase 1 Survey Report, further demonstrated the suitability of this site for affordable housing. These documents are available, if needed. Therefore, removal of this site from the island Plan, as which occurred in 2010, would be disastrous for the Island, because, as the inspectors concluded in their remarks in 2011 "we have heard enough to convince us not just that the problem is not being solved but that in all likelihood it is becoming (and will continue to become) worse."</p> <p>Here we are in 2013 - the situation has become worse - and it would therefore be folly not to rezone this site as the severity of the situation, particularly for young people, who are struggling to find acceptable accommodation, must not be under-estimated.</p>	Comment noted.
IR(1) -23	Mr Peter Thorne		Supporting	I support this development as it removes an eyesore, and is located next to the Built-up Area.	Comment noted.
IR(1) -26	Mrs Judy Martin	States Member (St. Helier No.1)	Supporting	<p>i do support but am looking the re-development of Le Squez and also Le Benifest Trust 80 or so houses.</p> <p>This is already a very high density scheme and no can see no plans for play area etc in these very large social housing ests This is building up again social problems for the future</p>	<p>Policy GD3 of the 2011 Island Plan seeks to ensure that the highest reasonable density is achieved for all developments that is commensurate with good design.</p> <p>A site of this scale would also be required to provide communal open space which could include provision for children's play.</p>
IR(1) -15	Mrs Rosemary Evans		Supporting	Again sensible	Comment noted.
IR(1) -100	Mrs Stephanie Steedman		Supporting	If sites like these are going to be brought forward, as a balance why not require significant improvements to sustainable transport provision as part of any potential redevelopment proposals? Include a reasonably sized bus	<p>The use of the site for housing is supported by TTS: the site is well served by public transport and facilities and amenities are within reasonable walking and cycling distance.</p> <p>Potential vehicular access and egress can be achieved from both La Grande Route de St</p>

Ref	Name	Agent/ Organisation	Supporting/ Objecting	Reasons for answer	Minister's Response
				shelter to encourage the residents living within walking distance to commute to town by bus?	Clement and Le Squez. The developer of the site, should it be rezoned, will be required to ensure that the local infrastructure is enhanced in order to deal with transport impact of the development which could include contributions to enhance public transport infrastructure and/or contribute to the development of the Eastern Cycle Network.
IR(1) -48	President Graham J Le Lay	JERSEY FARMERS' UNION	Supporting	With the demise of a vast proportion of the Horticultural Industry several years ago we would not object to the re-zoning of the following redundant glasshouse sites for Category "A" affordable housing providing the proposed change to Policy H5 is adhered to.  We feel that redundant glasshouse sites should be used for housing development prior to any green field sites being utilised. This will obviously improve the appearance of the countryside and the environment for the benefit of the Island and the Tourism Industry.	Comment noted.
IR(1) -7	Anonymous			More green space disappearing.	The Minister acknowledges the importance of protecting the countryside and safeguarding agricultural land but has sought to identify those sites which have already been subject to some form of development, albeit for agricultural purposes, on the edge of the existing built-up area as having the most potential to contribute to the Island's housing needs.
<b>Second Round Representation</b>					
IR(1)- 2n Rnd Rep	Richard McMullen		Objecting	<p>The Minister acknowledges the importance of protecting the countryside and safeguarding agricultural land but within this has he also considered the "ancillary work" also associated with this zoned green site?</p> <p>Site impact statements:</p> <p>"The under-capacity of the existing Public foul sewers in Rue du Maupertuis, and the known difficulty in upgrading them to accept flows from this development means that foul flows from this site will need to pump direct to the Public pumping station in Rue de Maupertuis".</p> <p>"Given the number of units being considered, the on-site pumping station will need to be Public and therefore constructed to TTS specification and by an approved contractor."</p> <p>"There are no Public surface water sewers readily available and there is some doubt whether soakaways will work on this site although investigations should be carried out to confirm this.</p> <p>Samares means salt marsh- this will be an issue!!</p> <p>If surface water cannot be disposed of on site then an off-site sewer would be required to connect the site to the existing surface water sewers in Rue du Maupertuis. However, a possible upgrade of the existing sewers in Rue de Maupertuis may be required as well as an upgrade to the surface water pumping station at Samares Marsh. In addition, on-site attenuation is also likely to be required to restrict the discharge rate from the site.</p> <p>A topographical survey will be required</p> <p>The Jersey Electricity Company has confirmed that two substations would be required to serve the development."</p> <p>"It is acknowledged that there are existing problems with the management of surface water in this locality which would need to be comprehensively addressed as part of any development of this site."</p> <p>Samares means salt marsh- this will be an issue!!</p> <p>"If access is off La Grande Route de St Clement, the noise environment for a significant number of existing residents will deteriorate."</p> <p>Extra 300 cars?</p>	<p>The site assessment, at Appendix B of the proposed amendment, sets out the considerations relating to the potential impact of the development of these sites upon the local infrastructure and the need to comprehensively address issues of both foul and surface water drainage is already highlighted.</p> <p>It is relevant to note that development in similar localities in Jersey, e.g. La Providence adjacent to Goose Green Marsh in St Lawrence, have successfully addressed drainage issues and not only delivered a successful outcome in terms of a development scheme, but also resolved existing issues of capacity in local infrastructure.</p>



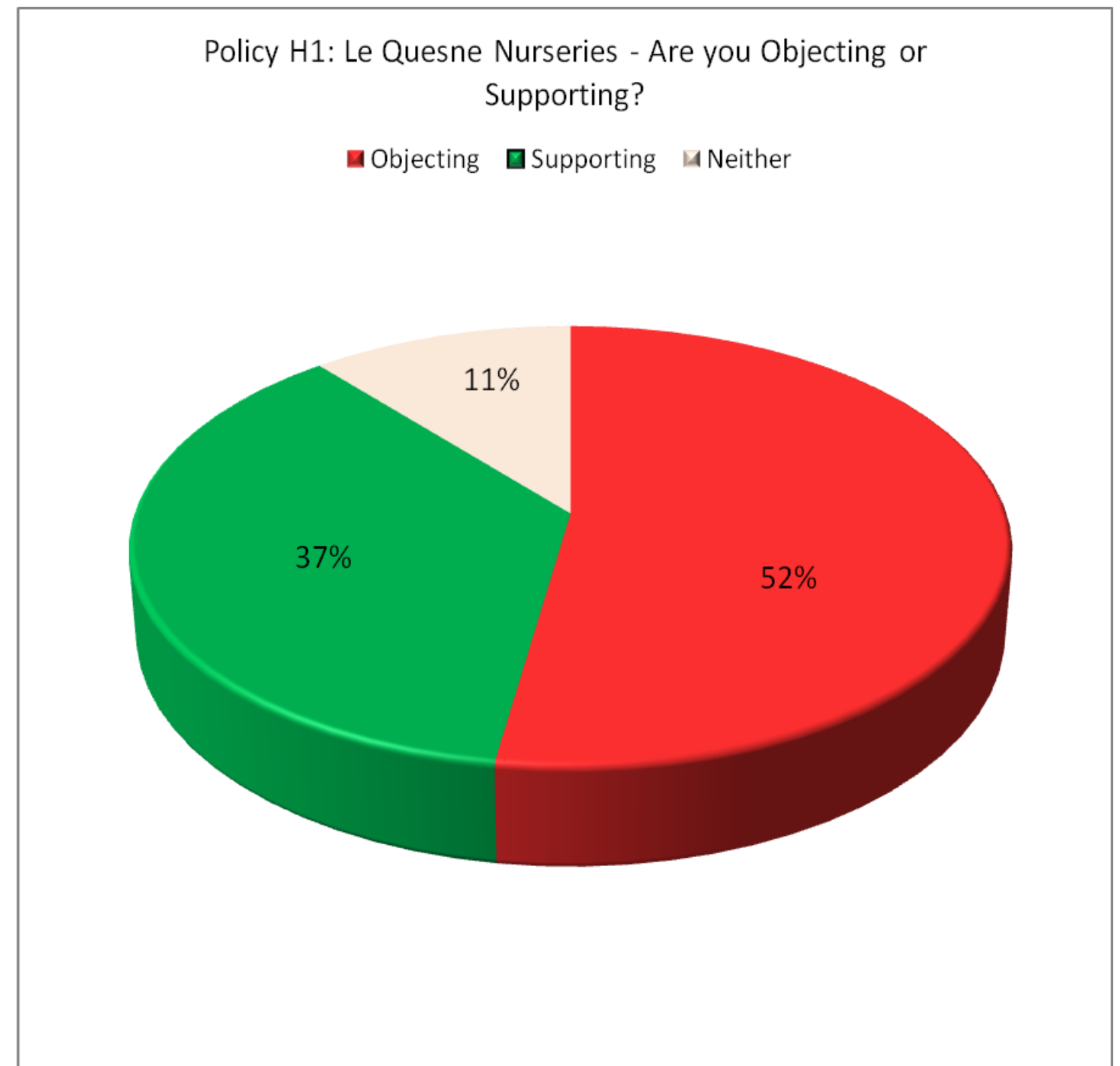
Ref	Name	Agent/ Organisation	Supporting/ Objecting	Reasons for answer	Minister's Response
				<p>"The predominant form of development in the area is two storeys with some three storey on the adjacent Le Squez site and there is an opportunity to introduce heights ranging from 2 storey (adjacent to existing development) up to three and four storeys toward the centre and south/east parts of the site".</p> <p>"The thrust of the Spatial Strategy of the 2011 Island Plan remains unaltered by the Minister's proposed amendments such that most of the Island's development needs should be met from within the existing built-up area."</p> <p>This site is in the green zone and should stay that way otherwise it makes the 2011 island plan a mockery. To build this density of houses alongside the on-going development of houses/flats at Le Squez estate will have a major impact on the Parish of St. Clements ,the people living there, and the development of an overpopulated Parish within a Parish.</p>	<p>The thrust of the Spatial Strategy of the 2011 Island Plan remains unaltered by the Minister's proposed amendments such that most of the Island's development needs should be met from within the existing built-up area: those sites identified for the provision of affordable housing in St. Clement are well-related to the existing built-up area and, in terms of the rezoning of land, offer the most sustainable opportunities for development when viewed from an island-wide perspective</p>

## Policy H1: Le Quesne Nurseries, St. Clement

The Minister for Planning and Environment is proposing to re-zone Le Quesne Nurseries, St. Clement for Category A affordable housing as part of the proposed revision of [policy H1](#).

### Questionnaire consultation results

	% Total	% Answer	Count
<b>Number of responses</b>	29%	-	63
<b>Objecting</b>	15%	52%	33
<b>Supporting</b>	11%	37%	23
<b>Neither</b>	3%	11%	7
<b>[No response]</b>	71%	-	156
<b>Total</b>	<b>100%</b>	<b>100%</b>	<b>219</b>



## Policy H1: Le Quesne Nurseries, St. Clement – comments

Ref	Name	Agent/ Organisation	Supporting/ Objecting	Reasons for answer	Minister's Response
IR(1) -177	Deputy John Le Fondré	States Member (St.Lawrence)	Neither	Provided this is supported by the Parish (Constable / Parish Assembly) and the Deputies, I can probably support the redevelopment of this glass house site. However I note that previously St Clement have been strongly of the view that they have had sufficient large scale development in the Parish.	Comment noted.
IR(1) -130	Mr Paul Harding	BDK Architects	Neither	We have no specific comments on the four sites (De La Mare Nurseries, Samarès Nurseries, Le Quesne Nurseries & Longueville Nurseries) proposed for rezoning as Category A Housing sites.	Comment noted.
				However we would point out that the proposed amendment to Green Zone Policy NE7, Policy numbers 15 & 16 as written would in future prevent other similar sites from being brought back into a useful purpose.	See response to IR(1) – 130 about Policy NE7
IR(1) -65	Anonymous		Objecting	But consider 1) the high density of housing in the area	Policy GD3 of the 2011 Island Plan seeks to ensure that the highest reasonable density is achieved for all developments that is commensurate with good design.
				the impact on traffic	The use of the site for housing is supported by TTS: the site has good access.
				pressure on local resources such as schools	The current and future ability of local schools to accommodate anticipated demand for places is material and ESC has advised that there is capacity.
				the importance of maintaining green land - possibly for allotments	The Minister acknowledges the importance of protecting the countryside and has sought to identify those sites which have already been subject to some form of development, albeit for agricultural purposes, on the edge of the existing built-up area as having the potential to contribute to the Island's housing needs.
IR(1) -4	Anonymous		Objecting	again more encroachment into the countryside	The Minister acknowledges the importance of protecting the countryside and safeguarding agricultural land but has sought to identify those sites which have already been subject to some form of development, albeit for agricultural purposes, on the edge of the existing built-up area as having the most potential to contribute to the Island's housing needs.
IR(1) -39	Anonymous		Objecting	agricultural land	The Minister acknowledges the importance of protecting the countryside and safeguarding agricultural land but has sought to identify those sites which have already been subject to some form of development, albeit for agricultural purposes, on the edge of the existing built-up area as having the most potential to contribute to the Island's housing needs.
IR(1) -118	Anonymous		Objecting	I agree that there is a requirement for additional houses in the parish though believe there is a greater need for over 50" s wo accommodation which in turn would release houses within the parish for growing families. The parish of St Clement has had more than its fair share of family houses.	The proposed form of housing development is informed by the latest housing needs assessment. Occupancy of affordable homes will be controlled through the Housing Gateway but does not preclude occupancy by people aged over-55.
IR(1) -13	Anonymous		Objecting	See my previous comments on glasshouses. This site would, in particular, be a disastrous urban intrusion into the countryside.	The Minister acknowledges the importance of protecting the countryside and safeguarding agricultural land but has sought to identify those sites which have already been subject to some form of development, albeit for agricultural purposes, on the edge of the existing built-up area as having the most potential to contribute to the Island's housing needs.
IR(1) -108	Anonymous		Objecting	St Clement has undergone a lot of new development in recent years. There is a disproportionate amount of proposed new development in this Parish compared to the rest of the Island. It is important that the remaining green spaces in this Parish are preserved.	The Minister acknowledges the importance of protecting the countryside and safeguarding agricultural land but has sought to identify those sites which have already been subject to some form of development, albeit for agricultural purposes, on the edge of the existing built-up area as having the most potential to contribute to the Island's housing needs.
IR(1) -20	Anonymous		Objecting	The area will become too overcrowded, there is sufficient housing in the island that if well managed can accommodate all those who need it	The decision to provide more affordable and social housing is a key action of the States Strategic Plan 2012. The latest evidence on affordability indicates that open market housing is beyond the reach of many people in Jersey (see: <a href="http://www.gov.je/Government/JerseyWorld/StatisticsUnit/Prices/Pages/HousingAffordability.aspx">http://www.gov.je/Government/JerseyWorld/StatisticsUnit/Prices/Pages/HousingAffordability.aspx</a> )
IR(1) -81	Anonymous		Objecting	There is already a high volume of traffic around this area. Whilst developing this site it was cause access problems to the individuals who reside in the	The use of the site for housing is supported by TTS: the site has good access.

Ref	Name	Agent/ Organisation	Supporting/ Objecting	Reasons for answer	Minister's Response
				area.	
IR(1) -24	Anonymous		Objecting	This place should be left well alone. We can all clearly see from this photo how built up the area is already. This should be made a green zone	The Minister acknowledges the importance of protecting the countryside and safeguarding agricultural land but has sought to identify those sites which have already been subject to some form of development, albeit for agricultural purposes, on the edge of the existing built-up area as having the most potential to contribute to the Island's housing needs.
IR(1) -91	Anonymous		Objecting	too much into the fields	The Minister acknowledges the importance of protecting the countryside and safeguarding agricultural land but has sought to identify those sites which have already been subject to some form of development, albeit for agricultural purposes, on the edge of the existing built-up area as having the most potential to contribute to the Island's housing needs.
IR(1) -59	Clare Mosson		Objecting	I am very concerned about the proposed development of the Le Quesne nurseries site for housing. There is already a high density of housing in the area, particularly since the development of the neighbouring site at Clos de Corvez. Further development will have an impact on traffic and will put pressure on local resources, such as the schools. We should be trying to maintain green land within built up zones. I hope that the Minister will bear this in mind. St Clement is already highly developed.	The Minister acknowledges the importance of protecting the countryside and safeguarding agricultural land but has sought to identify those sites which have already been subject to some form of development, albeit for agricultural purposes, on the edge of the existing built-up area as having the most potential to contribute to the Island's housing needs. The site assessment, at Appendix B of the proposed amendment, sets out the considerations relating to the potential impact of the development of this site upon the local infrastructure.
IR(1) -124	Connétable Len Norman	States Member (Parish of St Clement)	Objecting	<p>The following is an extract relating to both St Clement proposed rezoned sites Samarès and Le Quesne Nurseries, St Clément</p> <p>Both of these areas are in the Green Zone, the Zone which offers the highest protection against development.</p> <p>The first-mentioned site also has, I understand, "agricultural conditions" attached, which I am surprised your Department has not enforced, bearing in mind the current high demand for agricultural land.</p> <p>Samarès Nursery was afforded Green Zone status only two years ago by a unanimous vote of the States, effectively on the proposition of the now Chief Minister, Senator Ian Gorst. He was a St Clément Deputy at that time. It is incredible that we are even contemplating a change at this stage, when even the housing need remains unproven as I shall show later.</p> <p>The Le Quesne field has been in the Green Zone even longer. And what you should be asking yourself, is if these sites did not have glasshouses on them, and if their owners had not neglected them and let them get into a ruinous state of repair, would you be even considering a rezoning?</p> <p>Looking at the location plan of Le Quesne Nursery it is clear that this is a monstrous incursion into the Green Zone, a wedge of massive proportions into a neatly rectangular set of open fields. How will it be possible to resist development on the fields to the south, north and east of this proposed incursion in the future?</p>	<p>The decision to provide more affordable and social housing is a key action of the States Strategic Plan 2012.</p> <p>The latest evidence on affordability indicates that open market housing is beyond the reach of many people in Jersey (see: <a href="http://www.gov.je/Government/JerseyWorld/StatisticsUnit/Prices/Pages/HousingAffordability.aspx">http://www.gov.je/Government/JerseyWorld/StatisticsUnit/Prices/Pages/HousingAffordability.aspx</a>)</p> <p>The Minister acknowledges the importance of protecting the countryside and has sought to identify those sites which have already been subject to some form of development, albeit for agricultural purposes, on the edge of the existing built-up area as having the potential to contribute to the Island's housing needs.</p>

Ref	Name	Agent/ Organisation	Supporting/ Objecting	Reasons for answer	Minister's Response
				<p>You can be in no doubt that many residents of St Clément are becoming more and more distressed by the development that is occurring in the Parish, and even more so by the totally inappropriate style of development that is being permitted in some cases. La Rue de Jambart is a very sad example of a traditional country lane being ruined by urban standards being imposed on a rural community.</p> <p>St Clément is often spoken about these days as an urban Parish. Despite the excessive development that has taken place within its boundaries over the past years, it remains culturally and, in much of its area, physically rural. I look to you to help keep it that way.</p> <p>I ask you to remove Samarès Nursery and Le Quesne Nursery from the list of potential sites for rezoning on the grounds that it is not necessary, it is inappropriate and it would overburden a Parish which has already contributed more than its fair share of the housing provision for the Jersey population. More suitable and appropriate uses could be found for the sites, as I show later in this letter.</p>	<p>The site assessment, at Appendix B of the proposed amendment, sets out the considerations relating to the potential impact of the development of these sites upon the local infrastructure.</p> <p>The thrust of the Spatial Strategy of the 2011 Island Plan remains unaltered by the Minister's proposed amendments such that most of the Island's development needs should be met from within the existing built-up area: those sites identified for the provision of affordable housing in St. Clement are well-related to the existing built-up area and, in terms of the rezoning of land, offer the most sustainable opportunities for development when viewed from an island-wide perspective.</p>
IR(1) -19	Jessika kent		Objecting	<p>Strongly object, St Clement is such a built up parish, green zones, around areas of housing, is a necessity for a flourishing community.</p> <p>A park, community area, recreation grounds or even allotments would be ideal for this site.</p>	If this land is rezoned for development, then at least 10% of the site area would be required for public open space.
IR(1) -115	Jodi Shoer		Objecting	<p>This area of St Clements is already considered an overpopulated area. This will inevitably have an impact on traffic and air pollution.</p> <p>I live in one of the properties situated on the boarder, this is going to have an impact on the light which any of us facing this area receive, which is already limited. You allow this to proceed where will it stop? Not only is it degrading this area but it will also leave a huge negative impact on the financial value of the neighbouring houses and neighbourhood.</p> <p>What about the education amenities. This will reflect on the level of education we can provide for our children within this bracket.</p>	<p>The site assessment, at Appendix B of the proposed amendment, sets out the considerations relating to the potential impact of the development of these sites upon the local infrastructure. The current and future ability of local schools to accommodate anticipated demand for places is material and ESC has advised that there is capacity.</p> <p>Policy GD3 of the 2011 Island Plan seeks to ensure that the highest reasonable density is achieved for all developments that is commensurate with good design. The actual number, size and types of homes on each site will be determined through the planning process having regard to all material planning considerations, such as the protection of the amenities of adjacent residents.</p> <p>The rezoning and development of this site will afford people who need homes the opportunity of either purchasing or renting an affordable home; in much the same way as previous rezoned land has done.</p>
IR(1) -116	Karen Quenault		Objecting	<p>This area in particular is of concern for me as we live in Clos de Corvez, a FTB development which was built and sold as affordable housing at the time.</p> <p>This area of St Clement already has far too much traffic running through as it is the pinch point for cut through's from the coast road and inner road linking St Helier and Gorey.</p>	<p>The rezoning and development of this site will afford people who need homes the opportunity of either purchasing or renting an affordable home; in much the same way as previous rezoned land has done.</p> <p>The use of the site for housing is supported by TTS: the site has good access.</p>
				<p>You can see from the image how densely populated this area already is and the local people are crying out for more green space to be used as allotments or for the community in general. As this area was only green zoned recently it would be a complete disgrace to overturn the decision so quickly and would have a huge impact on the existing residents.</p>	If this land is rezoned for development, then at least 10% of the site area would be required for public open space.
				<p>It seems the East of the island is being used more and more and a development site when other parishes could just as easily support build work for affordable housing.</p> <p>There are also plenty of sites where upgrading is needed rather than knocking down greenhouse areas that could support more useful projects that would work within the community in a much more positive way.</p>	The thrust of the Spatial Strategy of the 2011 Island Plan remains unaltered by the Minister's proposed amendments such that most of the Island's development needs should be met from within the existing built-up area: those sites identified for the provision of affordable housing in St. Clement are well-related to the existing built-up area and, in terms of the rezoning of land, offer the most sustainable opportunities for development when viewed from an island-wide perspective.
				<p>Not to mention that St Clement only has one secondary school which is already being stretched.</p>	The current and future ability of local schools to accommodate anticipated demand for places is material and ESC has advised that there is capacity.



Ref	Name	Agent/ Organisation	Supporting/ Objecting	Reasons for answer	Minister's Response
IR(1) -99	Lesley Duffy		Objecting	<p>Really upsetting that this has come to light again! it was agreed nearly two years ago to stop further planning on this sight, so intrigued to know why this has so easily been acknowledged again. Obvious reasons being overpopulated already, not to mention availability in schools and heavier traffic on the road.</p> <p>Another objection is that my house overlooks this field, this will not only spoil my view completely but also cease a lovely green area currently being used for farming.</p>	<p>The decision to provide more affordable and social housing is a key action of the States Strategic Plan 2012.</p> <p>The latest evidence on affordability indicates that open market housing is beyond the reach of many people in Jersey (see: <a href="http://www.gov.je/Government/JerseyWorld/StatisticsUnit/Prices/Pages/HousingAffordability.aspx">http://www.gov.je/Government/JerseyWorld/StatisticsUnit/Prices/Pages/HousingAffordability.aspx</a>)</p> <p>The site assessment, at Appendix B of the proposed amendment, sets out the considerations relating to the potential impact of the development of these sites upon the local infrastructure. The current and future ability of local schools to accommodate anticipated demand for places is material and ESC has advised that there is capacity.</p> <p>Policy GD3 of the 2011 Island Plan seeks to ensure that the highest reasonable density is achieved for all developments that is commensurate with good design. The actual number, size and types of homes on each site will be determined through the planning process having regard to all material planning considerations, such as the protection of the amenities of adjacent residents.</p>
IR(1) -93	Matthew Sutton		Objecting	<p>Development of this site will inevitably lead to the joining together of Clos de Corvez and Sydney Crill Park. It will also be the first stage in the development of the whole area, bringing more houses to an already densely populated area.</p> <p>The area is still prime farming land; the owner has made no attempt to clear the land and put it to good use over the past 10 years and is simply awaiting planning permission before cashing in and bringing misery to the lives of others living nearby.</p> <p>The parishioners in the Parish of St Clement have already made their views known and are vehemently against any more development in this particular area.</p>	<p>The thrust of the Spatial Strategy of the 2011 Island Plan remains unaltered by the Minister's proposed amendments such that most of the Island's development needs should be met from within the existing built-up area: those sites identified for the provision of affordable housing in St. Clement are well-related to the existing built-up area and, in terms of the rezoning of land, offer the most sustainable opportunities for development when viewed from an island-wide perspective.</p>
IR(1) -123	Mike Jackson		Objecting	It's in the middle of a green field	<p>The Minister acknowledges the importance of protecting the countryside and has sought to identify those sites which have already been subject to some form of development, albeit for agricultural purposes, on the edge of the existing built-up area as having the potential to contribute to the Island's housing needs.</p>
IR(1) -51	Mr & Mrs Hewlett		Objecting	<p>Previously there were plans for bungalows on this site with part of the purpose to enable older members of the parish wishing to downsize being able to do so and to free up larger accommodation within the parish for families. This, we believe would be better for the parish as a whole. A need for this was, we believe, identified at the time of the previous application.</p> <p>Creating the large houses would, we believe, do a disservice to those parishioners who have been long term residents and who have contributed much to the parish and who would be overlooked again in favour of a large group of new residents less likely to contribute and more likely to place further greater demands on the parish.</p>	<p>The proposed form of housing development is informed by the latest housing needs assessment. Occupancy of affordable homes will be controlled through the Housing Gateway but does not preclude occupancy by people aged over-55.</p>
				<p>Bringing in such a large density of housing would, we feel, place a huge burden on already over burdened amenities and place a large financial burden on existing parishioners.</p> <p>This would also have a huge impact on existing properties, with the potential for the loss of natural light and privacy not to mention potential light and noise pollution dependant on the layout and design of the proposed estate.</p>	<p>The site assessment, at Appendix B of the proposed amendment, sets out the considerations relating to the potential impact of the development of these sites upon the local infrastructure. The current and future ability of local schools to accommodate anticipated demand for places is material and ESC has advised that there is capacity.</p> <p>The actual number, size and types of homes on each site will be determined through the planning process having regard to all material planning considerations, such as the protection of the amenities of adjacent residents.</p>
				<p>There is also the issue of whether a proper and extensive rodent clearing exercise would take place before any site clearance? Without this it could cause potential health risks to neighbouring properties.</p> <p>As the majority of this site is for socially rented accommodation what measures would be put in place to ensure properties are kept to a good standard as not doing so could have a significant financial impact to</p>	<p>Any contamination issues of the existing site would need to be dealt with as part of the planning application process.</p> <p>The maintenance of any homes developed on the site would be a matter for the social landlord and/or owners.</p>

Ref	Name	Agent/ Organisation	Supporting/ Objecting	Reasons for answer	Minister's Response
				neighbouring properties.	
				We realise there is significant need for all types of housing in the island but feel this is too higher density in too smaller area in an already densely populated parish which already has other housing needs which we feel should be addressed and therefore we feel we are unable to support the suggested plans for this site.	Policy GD3 of the 2011 Island Plan seeks to ensure that the highest reasonable density is achieved for all developments that is commensurate with good design. The decision to provide more affordable and social housing is a key action of the States Strategic Plan 2012. The latest evidence on affordability indicates that open market housing is beyond the reach of many people in Jersey (see: <a href="http://www.gov.je/Government/JerseyWorld/StatisticsUnit/Prices/Pages/HousingAffordability.aspx">http://www.gov.je/Government/JerseyWorld/StatisticsUnit/Prices/Pages/HousingAffordability.aspx</a> )
IR(1) -8	Mr Bob Henkhuzens		Objecting	The site should remain for agricultural purposes only.	The Minister acknowledges the importance of protecting the countryside and safeguarding agricultural land but has sought to identify those sites which have already been subject to some form of development, albeit for agricultural purposes, on the edge of the existing built-up area as having the most potential to contribute to the Island's housing needs..
				It is curious that the driver for the change is claimed to be a shortage of housing - a look at Friday's JEP will show pages and pages of houses and flats for sale.... The Island's government continues to fail to accept that the electorate are concerned about the increasing Island population - building more houses will not help to constrain this growth. Every piece of rural space that is lost will be lost forever. Furthermore for each piece that is lost, there will undoubtedly be a subsequent application to change the use of yet another piece of land next to one lost. A suspicion must surely be that the proposal is driven by the profit that will be made by the developer/land owner, and thus not concerned with the needs, rights and adverse effects on the majority of the current Island community, nor those of the neighbouring households.	The decision to provide more affordable and social housing is a key action of the States Strategic Plan 2012. The latest evidence on affordability indicates that open market housing is beyond the reach of many people in Jersey (see: <a href="http://www.gov.je/Government/JerseyWorld/StatisticsUnit/Prices/Pages/HousingAffordability.aspx">http://www.gov.je/Government/JerseyWorld/StatisticsUnit/Prices/Pages/HousingAffordability.aspx</a> )
				As regards this and the other proposals referred to in this consultation, the impact on traffic flows and the adequacy of and impacts on the roads and access to public services systems do not seem to be included as part of the assessment.	The site assessment, at Appendix B of the proposed amendment, sets out the considerations relating to the potential impact of the development of these sites upon the local infrastructure. The current and future ability of local schools to accommodate anticipated demand for places is material and ESC has advised that there is capacity.
IR(1) -14	Mr Ian Bromley		Objecting	Same reasons as Samarès Nursery.	See response in relation to Samarès Nursery.
IR(1) -67	Mr James Godfrey	Royal Jersey Agricultural & Horticultural Society	Objecting	This forms part of a very viable block of agricultural land and should be returned to such.	The Minister acknowledges the importance of protecting the countryside and safeguarding agricultural land but has sought to identify those sites which have already been subject to some form of development, albeit for agricultural purposes, on the edge of the existing built-up area as having the most potential to contribute to the Island's housing needs..
IR(1) -17	Mr John Shenton		Objecting	Please refer to similar comments in relation to the previous St Clement site - access is poor and the parish is already overdeveloped.	See response in relation to Samarès Nursery.
IR(1) -184	Richie Griffiths		Objecting	Having read the 2011 Island Plan: Interim Review (#1) I must confess I am staggered to see that yet again St. Clement is being earmarked to meet the housing needs of the island. May I just take this opportunity to say that I believe that other parishes should be genuinely considered as St Clement in my opinion is already creaking under the weight of its existing parishioners. We are the smallest Parish in the Island and we are the second most densely populated with 2,142 islanders per square Km (as per the 2011 census) which I suspect has now increased further. We are currently 9% of the Island's population and the infrastructure is under huge pressure with too much traffic, too much housing and our schools cannot cope with the children in catchment. There must be other areas on the circa 45 square miles outside of our Parish that can be used for housing whatever the category. There are many parishes that enjoy the luxury of less than a 5% weighting of the population, almost half	The site assessment, at Appendix B of the proposed amendment, sets out the considerations relating to the potential impact of the development of these sites upon the local infrastructure. The thrust of the Spatial Strategy of the 2011 Island Plan remains unaltered by the Minister's proposed amendments such that most of the Island's development needs should be met from within the existing built-up area: those sites identified for the provision of affordable housing in St. Clement are well-related to the existing built-up area and, in terms of the rezoning of land, offer the most sustainable opportunities for development when viewed from an island-wide perspective.

Ref	Name	Agent/ Organisation	Supporting/ Objecting	Reasons for answer	Minister's Response
				of that of St. Clement, with density of population at significantly lower levels and in some cases 8 times less!! I think it is about high time that the other parishes start to shoulder the burden of our ballooning population and urgent action is required before St. Clement is completely.	
IR(1) -183	Rosemary Marr		Objecting	I want to register my opposition to the proposal to amend the Island Plan so that 2 Glasshouse sites(Samarès Nurseries and Le Quesne Nurseries) in St Clement are rezoned for the purpose of building affordable housing. St Clement is the smallest Parish by area and has already had more than its fair share of Social and private housing . I am pleased there is to be a public meeting in the Parish in order to address our concerns to the Planning Minister at which I suspect there will be some strong opposition.	The site assessment, at Appendix B of the proposed amendment, sets out the considerations relating to the potential impact of the development of these sites upon the local infrastructure. The thrust of the Spatial Strategy of the 2011 Island Plan remains unaltered by the Minister's proposed amendments such that most of the Island's development needs should be met from within the existing built-up area: those sites identified for the provision of affordable housing in St. Clement are well-related to the existing built-up area and, in terms of the rezoning of land, offer the most sustainable opportunities for development when viewed from an island-wide perspective.
IR(1) -97	Ryan & Debbie Lumsden		Objecting	St. Clement is already the most densely populated parish and the addition of the proposed social housing will put an undue strain on the parish's infrastructure including schools and roads which are already stretched to capacity. The traffic is already bad at peak hours, particularly on the inner road near FB fields and this will only get worse with the additional housing causing more pollution and requirements for road maintenance. For the reasons outlined above and the fact that there are many other less densely populated parishes in which housing could be built I object to this proposal.	The site assessment, at Appendix B of the proposed amendment, sets out the considerations relating to the potential impact of the development of these sites upon the local infrastructure. The thrust of the Spatial Strategy of the 2011 Island Plan remains unaltered by the Minister's proposed amendments such that most of the Island's development needs should be met from within the existing built-up area: those sites identified for the provision of affordable housing in St. Clement are well-related to the existing built-up area and, in terms of the rezoning of land, offer the most sustainable opportunities for development when viewed from an island-wide perspective.
IR(1) -102	Sharon Lavery		Objecting	What shall happen in relation to the high density of housing in the area already, the huge impact on traffic, pressure on local resources such as schools and the importance of maintaining green land - possibly for allotments? - see local media recently. It is such a built up area already so to have all if these proposed houses will have a huge impact in lots of things.	The site assessment, at Appendix B of the proposed amendment, sets out the considerations relating to the potential impact of the development of these sites upon the local infrastructure. The thrust of the Spatial Strategy of the 2011 Island Plan remains unaltered by the Minister's proposed amendments such that most of the Island's development needs should be met from within the existing built-up area: those sites identified for the provision of affordable housing in St. Clement are well-related to the existing built-up area and, in terms of the rezoning of land, offer the most sustainable opportunities for development when viewed from an island-wide perspective.
				also how high are these properties I certainly do not want my personal space invaded and or to have someone looking into my window or back garden??	The actual number, size and types of homes on each site will be determined through the planning process having regard to all material planning considerations, such as the protection of the amenities of adjacent residents.
IR(1) -121	Susie Pinel	States Member (St. Clement)	Objecting	The same reason for objecting to the development of Samarès Nurseries applies to this site. St. Clement is already heavily urbanised and does not have the necessary infrastructure to support this degree of residential expansion.	The site assessment, at Appendix B of the proposed amendment, sets out the considerations relating to the potential impact of the development of this site upon the local infrastructure.
IR(1) -16	Anonymous		Supporting	Each site should have been included in the original 2011 island plan as each development was necessary to achieve the affordable housing objective. The 2011 plan ended up being a political fudge - the published solution to the identified policy objective was always bound to fail. As was apparent from the draft 2011 plan, the identified sites need to be developed or the affordable housing objective will not be met. Ultimately there will always be objections made to a proposed development regardless of its location. Objectors will raise any number of arguments but these always come back to "there is too much building in the island" and/or "there is too much building in my Parish or near my own home". Each site survey considered the real issues involved (traffic, sewerage, visual impact, alternative land use etc) and concluded, subject to planning conditions, that all of these could be adequately addressed.	Comment noted.
IR(1) -114	Carlo Riva	The Association of Jersey	Supporting	No comment	Comment noted.

Ref	Name	Agent/ Organisation	Supporting/ Objecting	Reasons for answer	Minister's Response
		Architects			
IR(1) -25	Carlo Riva	Riva Architects Ltd	Supporting	No comment	Comment noted.
IR(1) -49	Chris Lamy		Supporting	Supporting as a site for social housing.	Comment noted.
IR(1) -45	J Le Main		Supporting	Same position as the previous two sites.	Comment noted.
IR(1) -5	L & M Howard		Supporting	For the same reason as previously mentioned	Comment noted.
IR(1) -176	Martin Whitley	La Comité du Commune Rurale St. Jean	Supporting	The proposed development of former nursery sites for category A housing is a sensible use of land.	Comment noted.
IR(1) -32	Mr Michael Stein	MSPlanning Ltd	Supporting	again, makes sense to use derelict glasshouse site, adjacent to the Built Up Area.	Comment noted.
IR(1) -23	Mr Peter Thorne		Supporting	I support this development as it removes an eyesore, and is located next to the Built-up Area.	Comment noted.
IR(1) -29	Mr Peter Thorne		Supporting	<p>Proposed Amendments to the 2011 Island Plan Le Quesne Nurseries, St Clement (Site B.3 H1 [7] On behalf of the potential developers of the above site, Alpine Contractors Ltd, I wish to offer the following comments in support of its designation for affordable housing in the proposed Amendments to the Island Plan.</p> <p>The site was considered in the mid-2000s under the Planning &amp; Environment Committee Presidency of, then, Deputy Maurice Dubras. The Committee of the day was minded to support the development of the site for housing purposes following a meeting of the Committee with the prospective developers and the owner on site. The site is eminently suitable for affordable housing, as it is a derelict glasshouse site, an eyesore and a potential danger for children in the neighbourhood. I am pleased to see the site proposed for affordable housing as an amendment to the 2011 Island Plan.</p> <p>The site is 17640m<sup>2</sup> in area and the prospective developers have produced a preliminary development scheme of 68 houses for the site which provides for the construction of: · 47 x 2-storey, 3-bedroom houses for social housing; · 8 x 3-storey, 4-bedrom houses for social housing; and · 13x 2-storey, 3-bedroom house for sale. The proportions of the social housing and housing for sale would be 80%/20% in accordance with the Minister's proposal to amend the housing mix.</p> <p>It is my view, however, that the split should be incorporated into supplementary guidance, rather than the policy, as the requirements are likely to change on a relatively frequent basis following each biennial Housing Review. If it remains in the policy, then it will be necessary for the States Assembly to amend the figures.</p>	Comment noted.
IR(1) -26	Mrs Judy Martin		Supporting	same comment applies need space for young people/teenagers to play etc	<p>Policy GD3 of the 2011 Island Plan seeks to ensure that the highest reasonable density is achieved for all developments that is commensurate with good design.</p> <p>A site of this scale would also be required to provide communal open space which could include provision for children's play.</p>
IR(1) -15	Mrs Rosemary Evans		Supporting	Sensible but with all these sites it raises anxious thoughts as to what will happen when current agricultural sites become redundant	Comment noted.



Ref	Name	Agent/ Organisation	Supporting/ Objecting	Reasons for answer	Minister's Response
IR(1) -48	President Graham J Le Lay	JERSEY FARMERS' UNION	Supporting	<p>With the demise of a vast proportion of the Horticultural Industry several years ago we would not object to the re-zoning of the following redundant glasshouse sites for Category "A" affordable housing providing the proposed change to Policy H5 is adhered to.</p> <p>We feel that redundant glasshouse sites should be used for housing development prior to any green field sites being utilised. This will obviously improve the appearance of the countryside and the environment for the benefit of the Island and the Tourism Industry.</p>	Comment noted.
IR(1) -7	Anonymous			More green space disappearing. A developers dream. Convert back to agriculture land.	The Minister acknowledges the importance of protecting the countryside and safeguarding agricultural land but has sought to identify those sites which have already been subject to some form of development, albeit for agricultural purposes, on the edge of the existing built-up area as having the most potential to contribute to the Island's housing needs..

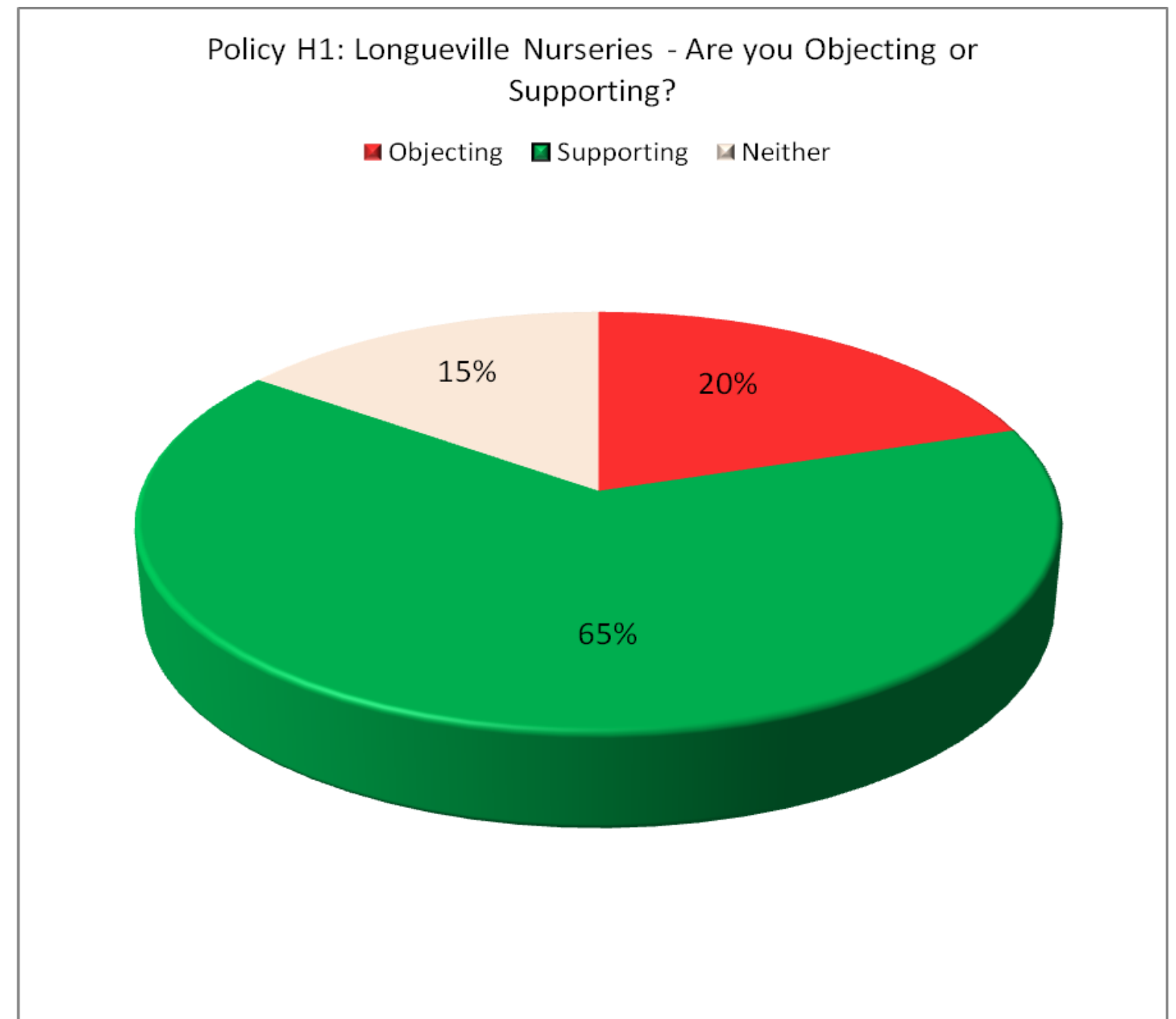


## Policy H1: Longueville Nurseries, St. Saviour

The Minister for Planning and Environment is proposing to rezone Longueville Nurseries, St. Saviour for Category A affordable housing as part of the proposed revision of [policy H1](#).

### Questionnaire consultation results

	% Total	% Answer	Count
<b>Number of responses</b>	27%	-	60
<b>Objecting</b>	5%	20%	12
<b>Supporting</b>	18%	65%	39
<b>Neither</b>	4%	15%	9
<b>[No response]</b>	73%	-	159
<b>Total</b>	<b>100%</b>	<b>100%</b>	<b>219</b>



## Policy H1: Longueville Nurseries, St. Saviour - comments

Ref	Name	Agent/ Organisation	Supporting/ Objecting	Reasons for answer	Minister's Response
IR(1) -177	Deputy John Le Fondré	States Member (St.Lawrence)	Neither	Provided this is supported by the Parish (Constable / Parish Assembly) and the Deputies, I can probably support the redevelopment of this glass house site. However I note that previously St Clement have been strongly of the view that they have had sufficient large scale development in the Parish.	Comment noted.
IR(1) -130	Mr Paul Harding	BDK Architects	Neither	We have no specific comments on the four sites (De La Mare Nurseries, Samarès Nurseries, Le Quesne Nurseries & Longueville Nurseries) proposed for rezoning as Category A Housing sites.	Comment noted
				However we would point out that the proposed amendment to Green Zone Policy NE7, Policy numbers 15 & 16 as written would in future prevent other similar sites from being brought back into a useful purpose.	See response to IR(1) – 130 about Policy NE7
IR(1) -65	Anonymous		Objecting	But consider 1) the high density of housing in the area	Policy GD3 of the 2011 Island Plan seeks to ensure that the highest reasonable density is achieved for all developments that is commensurate with good design.
				the impact on traffic	The use of the site for housing is supported by TTS: the site has good access and offers realistic alternatives to the use of the car.
				pressure on local resources such as schools	The current and future ability of local schools to accommodate anticipated demand for places is material and ESC has advised that there is capacity.
				the importance of maintaining green land - possibly for allotments	The Minister acknowledges the importance of protecting the countryside and has sought to identify those sites which have already been subject to some form of development on the edge of the existing built-up area as having the potential to contribute to the Island's housing needs.
IR(1) -39	Anonymous		Objecting	agricultural land	It is considered that the established planning use of the land is no longer agricultural following the release of agricultural conditions related to the adjacent dwelling house and the operation of the site as a as a retail garden centre.
IR(1) -98	Anonymous		Objecting	Dreadful entrance and exits, too many houses. Changing the character of the area detrimentally	The use of the site for residential development is supported by TTS. Policy GD3 of the 2011 Island Plan seeks to ensure that the highest reasonable density is achieved for all developments that is commensurate with good design. As stated at Appendix B, the site assessment have been undertaken thus far have been carried out to identify and consider the planning issues that are particular to each site and to provide a <i>potential indication</i> of housing yield: they are by no means definitive and, as stated, the actual number of homes on each site will be determined through the planning process having regard to all material planning considerations, such as the character of the surrounding area.
IR(1) -4	Anonymous		Objecting	more encroachment	The Minister acknowledges the importance of protecting the countryside and has sought to identify those sites which have already been subject to some form of development on the edge of the existing built-up area as having the potential to contribute to the Island's housing needs.
IR(1) -12	Anonymous		Objecting	no MORE GREEN FIELD DEVELOPMENT	The Minister acknowledges the importance of protecting the countryside and has sought to identify those sites which have already been subject to some form of development on the edge of the existing built-up area as having the potential to contribute to the Island's housing needs.
IR(1) -218	Connétable Sadie Rennard	Parish of St Saviour	Objecting	I was disappointed to read in the local press, the day before I received your communication, that you are considering rezoning the former site of Longueville Nurseries to create Housing; this without first taking into account the views of the Parish in which it is situated. I am aware that the matter will be subject to further consultation, and I will also ensure that it is placed on the agenda for consideration by the current Roads Committee, but would like to register my initial concern as a matter of high priority. My main worry about the suitability of the site is that of road safety; a subject upon which your department's site assessment barely touches upon. The site	Comments noted. The use of the site for housing is supported by TTS. The limited number of dwellings identified for this site is likely to generate a lower number of vehicle movements than the approved use. However the matter of road safety is an issue which will be referred back to the Highway Engineers for further comment.

Ref	Name	Agent/ Organisation	Supporting/ Objecting	Reasons for answer	Minister's Response
				<p>assessment suggests only that it is reasonably accessible and that it is within easy walking distance of local amenities. What further surprises me is that TTS Highway Engineers are also supportive of the proposal. They admit that trip generation is likely to be fairly high and that it may be possible to encourage residents to use alternatives such as walking or taking the bus, but I am certain that most will still choose to travel by car.</p> <p>When the late Constable Philip Ozouf and the Roads Committee were approached by the Minister for Housing in 2007 requesting support for a proposal to develop the Nursery, the Roads Committee were of the opinion, and I quote from the minutes of the meeting held on the 21st June 2007:- "That such development would exasperate an already problematic traffic situation in the area and were concerned that safe and acceptable traffic merger from such a development would be difficult to achieve given the lie of the land in relation to Longueville Road"</p> <p>A similar approach from a developer received an identical response from me last year. I kindly request that considerable thought be given to the above.</p>	
IR(1) -171	Deputy Roy Le Hérissier	States Member (St. Saviour No. 3): Planning Applications Panel member	Objecting	<p>I am particularly concerned about Longueville Nurseries. The issues raised in the 2011 debate still pertain.</p> <p>Development will exacerbate traffic issues, puts pressure on a small road and leads to more planning "creep" into the countryside.</p>	<p>The site assessment, at Appendix B of the proposed amendment, sets out the considerations relating to the potential impact of the development of these sites upon the local infrastructure.</p> <p>The thrust of the Spatial Strategy of the 2011 Island Plan remains unaltered by the Minister's proposed amendments such that most of the Island's development needs should be met from within the existing built-up area: those sites identified for the provision of affordable housing in St. Clement are well-related to the existing built-up area and, in terms of the rezoning of land, offer the most sustainable opportunities for development when viewed from an island-wide perspective.</p>
IR(1) -8	Mr Bob Henkhuzens		Objecting	The site should remain for agricultural purposes only.	It is considered that the established planning use of the land is no longer agricultural following the release of agricultural conditions related to the adjacent dwelling house and the operation of the site as a retail garden centre.
				<p>It is curious that the driver for the change is claimed to be a shortage of housing - a look at Friday's JEP will show pages and pages of houses and flats for sale.... The Island's government continues to fail to accept that the electorate are concerned about the increasing Island population - building more houses will not help to constrain this growth. Every piece of rural space that is lost will be lost forever. Furthermore for each piece that is lost, there will undoubtedly be a subsequent application to change the use of yet another piece of land next to one lost.</p> <p>A suspicion must surely be that the proposal is driven by the profit that will be made by the developer/land owner, and thus not concerned with the needs, rights and adverse effects on the majority of the current Island community, nor those of the neighbouring households.</p>	<p>The decision to provide more affordable and social housing is a key action of the States Strategic Plan 2012.</p> <p>The latest evidence on affordability indicates that open market housing is beyond the reach of many people in Jersey (see: <a href="http://www.gov.je/Government/JerseyWorld/StatisticsUnit/Prices/Pages/HousingAffordability.aspx">http://www.gov.je/Government/JerseyWorld/StatisticsUnit/Prices/Pages/HousingAffordability.aspx</a>)</p>
				As regards this and the other proposals referred to in this consultation, the impact on traffic flows and the adequacy of and impacts on the roads and access to public services systems do not seem to be included as part of the assessment.	The site assessment, at Appendix B of the proposed amendment, sets out the considerations relating to the potential impact of the development of these sites upon the local infrastructure. The current and future ability of local schools to accommodate anticipated demand for places is material and ESC has advised that there is capacity.
IR(1) -16	Anonymous		Supporting	<p>Each site should have been included in the original 2011 island plan as each development was necessary to achieve the affordable housing objective. The 2011 plan ended up being a political fudge - the published solution to the identified policy objective was always bound to fail.</p> <p>As was apparent from the draft 2011 plan, the identified sites need to be developed or the affordable housing objective will not be met. Ultimately there will always be objections made to a proposed development regardless of its location. Objectors will raise any number of arguments but these always come back to "there is too much building in the island" and/or "there is too much building in my Parish or near my own home". Each site survey considered the real issues involved (traffic, sewerage, visual impact, alternative land use etc)</p>	Comment noted.

Ref	Name	Agent/ Organisation	Supporting/ Objecting	Reasons for answer	Minister's Response
				and concluded, subject to planning conditions, that all of these could be adequately addressed.	
IR(1) -13	Anonymous		Supporting	This is the one site which could reasonably be re-zoned given its use and location. I did not understand why it was rejected in the 2011 Island Plan.	Comment noted.
IR(1) -114	Carlo Riva	The Association of Jersey Architects	Supporting	No comment	Comment noted.
IR(1) -25	Carlo Riva	Riva Architects Ltd	Supporting	No comment	Comment noted.
IR(1) -49	Chris Lamy		Supporting	Supporting as a site for affordable purchase housing. There is also a natural States development area suitable for Category A Housing to the West and North through to RUE ST THOMAS :- field numbers, 741 and 741A again for affordable purchase housing.	Comment noted.
IR(1) -45	J Le Main		Supporting	Again, this makes more sense given it is already built upon.	Comment noted.
IR(1) -5	L & M Howard		Supporting	For the same reasons as previously stated	Comment noted.
IR(1) -176	Martin Whitley	La Comité du Commune Rurale St. Jean	Supporting	The proposed development of former nursery sites for category A housing is a sensible use of land.	Comment noted.
IR(1) -141	Mr Brian Hamon	MSPlanning Ltd	Supporting	Conclusion (Extract from attached report) There is little doubt that Longueville Nurseries is an appropriate site for affordable housing both in terms of its overall suitability and because it will be able to deliver a reasonable proportion of the affordable housing that is required within a relatively short timeframe. Therefore, removal of this site from the Interim Island Plan, as which occurred in 2010, would be disastrous for the island, because, as the inspectors concluded in their remarks in 2011 "we have heard enough to convince us not just that the problem is not being solved but that in all likelihood it is becoming (and will continue to become) worse. Here we are in 2013 - the situation has become worse - and it would therefore be folly not to re-zone this site as the severity of the situation, particularly for young people, who are struggling to find acceptable accommodation, must not be under-estimated. It therefore makes eminent sense to re-zone the whole of the site, as requested.	Comment noted. The Minister is not minded to extend the boundaries of the proposed site for housing to ensure that the impact of development does not unduly intrude into the countryside.
IR(1) -67	Mr James Godfrey	Royal Jersey Agricultural & Horticultural Society	Supporting	The could be achieved with returning the rest of the site to agricultural land.	Comment noted.
IR(1) -17	Mr John Shenton		Supporting	This site is smaller than the two previous sites and given the amount of properties within the area this development would not overheat the surrounding areas.	Comment noted.
IR(1) -32	Mr Michael Stein	MSPlanning Ltd	Supporting	Fully support, but wasted opportunity to use only half of the site. why only half this site when other H1 and H5 sites are fully used, notwithstanding encroaching into countryside. Rue Messervy would make a natural boundary to the new Built Up Area.	Comment noted. The Minister is not minded to extend the boundaries of the proposed site for housing to ensure that the impact of development does not unduly intrude into the countryside.
IR(1) -23	Mr Peter Thorne		Supporting	I support this development as it removes an eyesore, and is located next to the Built-up Area.	Comment noted.
IR(1) -29	Mr Peter		Supporting	Proposed Amendments to the 2011 Island Plan Longueville Nurseries, St Saviour Longueville Nurseries was put forward as a proposed housing site by	Comment noted.



Ref	Name	Agent/ Organisation	Supporting/ Objecting	Reasons for answer	Minister's Response
	Thorne			<p>the former Minister for Planning and the Environment, in the consultation draft of the Island Plan in September 2009. There were a limited number of private objections to the site, but because the Connétable of St Saviour had objected to the development, the Minister removed the site from the Revised Draft Island Plan. The Minister removed three of the original sites identified in Policy H1 of the consultation draft of the Plan because of opposition from the respective Constables, notwithstanding the background of the mounting crisis of affordable housing delivery.</p> <p>The EIP Inspectors in their November 2010 report remarked that "we do not consider that removing the provision of more than half of the potential sites, without replacing them, is acceptable". They considered Longueville Nurseries to be a good site for Category A housing. The scores were 'high' and 'good' in its assessment against the spatial strategy of the Plan. The Inspectors stated in their report: "Taking a holistic view of the overall strategy of the Island Plan; the need for affordable housing; and the alternatives which are available, we strongly believe that those two sites (Longueville and Samarès Nurseries) were correctly included and must be retained if the housing aims of the Plan are to be achieved."</p> <p>Longueville Nurseries is a genuine brown-field site, and cannot effectively be brought back into productive agricultural use. It has been used for glasshouse growing since the 19<sup>th</sup> century. The site is relatively close to Town, and is conveniently located for bus routes, shops, a bank, a Doctors' surgery, Chemist, Rue des Pres Trading Estate, and Plat Douet Primary School. The authorised use of the sales building is for retail purposes. It was approved as a retail unit without restriction, and there is nothing Planning could do to prevent it being taken over as a corner shop, DIY sales or any other retail use - permission has already been granted and implemented and therefore cannot be revoked. Is a retail use appropriate for this site? Surely it is a far better to use to meet the overriding need for affordable housing.</p> <p>A development of houses would have far less impact on its surroundings than what may become a thriving retail business on the site. As part of a planning permission granted for the property to the south of the Nursery site, the turning circle and visibility to the west have been improved significantly. The owner of the site retired from the business some years ago and it has been leased to a tenant on a short-term basis. It is most unlikely that there will be any significant investment in the premises to keep the existing use going.</p> <p>There is, in the wings, a developer with a long track record of developing first-time buyer homes at affordable prices. He has funding and has stated that he can build 3-bedroom family homes for sale for £280,000 - £290,000 on the site, given the opportunity. There is an increasing need for affordable homes, and the real likelihood that the 2013 Island Plan will fail to deliver sufficient affordable homes in the first few years. Indeed, it has provided very few to date.</p> <p>It is essential to zone more land for Category A housing in the Island Plan to meet affordable housing requirements. Longueville Nurseries is one of the 3 sites recommended for affordable housing by the Inspectors to the Examination in Public of the 2011 Island Plan.</p>	
IR(1) -26	Mrs Judy Martin	States Member (St. Helier No.1)	Supporting	they are on edge of built up area but roads need to be good	Comment noted.
IR(1) -15	Mrs Rosemary Evans		Supporting	see above	Comment noted.
IR(1) -100	Mrs Stephanie Steedman		Supporting	If sites like these are going to be brought forward, as a balance why not require significant improvements to sustainable transport provision as part of any potential redevelopment proposals? Include a reasonably sized bus	The developer of the site, should it be rezoned, will be required to ensure that the local infrastructure is enhanced in order to deal with transport impact of the development which could include contributions to enhance public transport infrastructure and/or contribute to the

Ref	Name	Agent/ Organisation	Supporting/ Objecting	Reasons for answer	Minister's Response
				shelter to encourage the residents living within walking distance to commute to town by bus?	development of the Eastern Cycle Network.
IR(1) -48	President Graham J Le Lay	JERSEY FARMERS' UNION	Supporting	With the demise of a vast proportion of the Horticultural Industry several years ago we would not object to the re-zoning of the following redundant glasshouse sites for Category "A" affordable housing providing the proposed change to Policy H5 is adhered to.  We feel that redundant glasshouse sites should be used for housing development prior to any green field sites being utilised. This will obviously improve the appearance of the countryside and the environment for the benefit of the Island and the Tourism Industry.	Comment noted.
IR(1) -7	Anonymous			Convert back to agricultural land. Green space disappearing again.	It is considered that the established planning use of the land is no longer agricultural following the release of agricultural conditions related to the adjacent dwelling house and the operation of the site as a as a retail garden centre.

## Policy H2: proposed tenure split

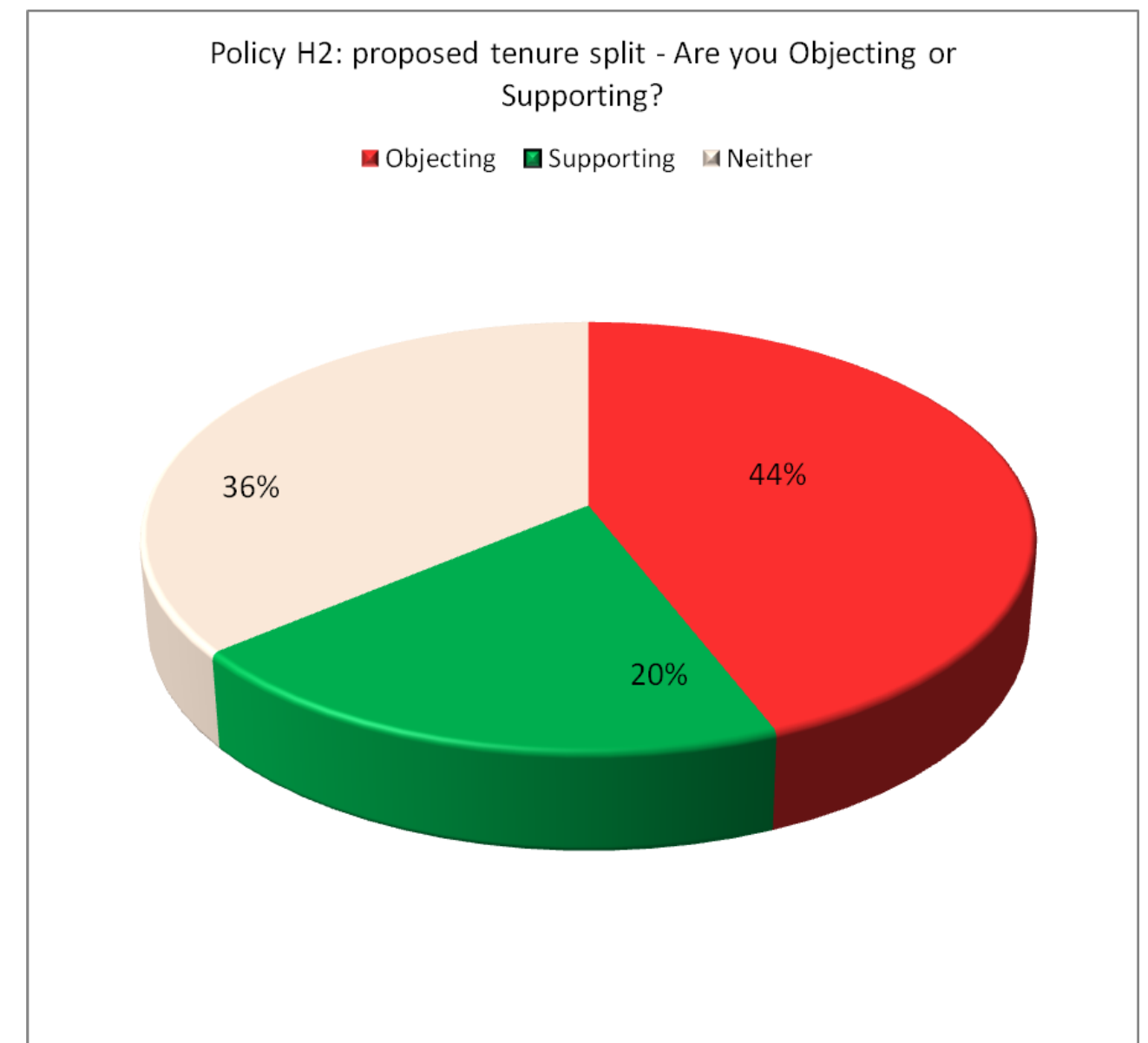
The Minister for Planning and Environment is proposing a revision of Policy H2: Other Category A housing sites. This would affect those sites that are already zoned for the provision of Category A homes in the 2011 Island Plan including:

Field 873, St. Lawrence  
Field 274, St Clement

The Minister proposes that the tenure split is changed to be in line with other proposed rezonings in the revised Plan to deliver 80% social rented and 20% category A affordable homes for purchase on these sites.

### Questionnaire consultation results

	% Total	% Answer	Count
<b>Number of Responses</b>	23%	-	50
<b>Objecting</b>	10%	44%	22
<b>Supporting</b>	5%	20%	10
<b>Neither</b>	8%	36%	18
<b>[No Response]</b>	77%	-	169
<b>Total</b>	<b>100%</b>	<b>100%</b>	<b>219</b>



**Policy H2: proposed tenure split- comments**

Ref	Name	Agent/ Organisation	Supporting/ Objecting	Reasons for answer	Minister's Response
IR(1) -26	Mrs Judy Martin		Neither	same comment needs to be flexible	Comment noted
IR(1) -100	Mrs Stephanie Steedman		Neither	Ensure split enables viable schemes.	Comment noted. No evidence is submitted to suggest otherwise..
IR(1) -65	Anonymous		Objecting	1) the high density of housing in the area already 2) the impact on traffic 3) pressure on local resources such as schools 4) the importance of maintaining green land - possibly for allotments	These sites are already rezoned in the 2011 Island Plan for the purposes of delivering Category A homes. The Minister's proposed amendment just seeks to amend the proportion and type of housing tenure to be delivered on them to meet current needs.
IR(1) -87	Anonymous		Objecting	General comments as per H1. No specific comments.	These sites are already rezoned in the 2011 Island Plan for the purposes of delivering Category A homes. The Minister's proposed amendment just seeks to amend the proportion and type of housing tenure to be delivered on them to meet current needs.
IR(1) -20	Anonymous		Objecting	make already overpopulated areas more so, there is no need for additional housing in this area	These sites are already rezoned in the 2011 Island Plan for the purposes of delivering Category A homes. The Minister's proposed amendment just seeks to amend the proportion and type of housing tenure to be delivered on them to meet current needs.
IR(1) -10	Anonymous		Objecting	no more fields we will need them for our children to feed themselves	These sites are already rezoned in the 2011 Island Plan for the purposes of delivering Category A homes. The Minister's proposed amendment just seeks to amend the proportion and type of housing tenure to be delivered on them to meet current needs.
IR(1) -13	Anonymous		Objecting	See my previous comments on this. I would favour 55% owner occupiers and 45% social rental.	The Minister's proposed amendment seeks to respond to current needs.
IR(1) -4	Anonymous		Objecting	we should be looking at sites within town	These sites are already rezoned in the 2011 Island Plan for the purposes of delivering Category A homes. The Minister's proposed amendment just seeks to amend the proportion and type of housing tenure to be delivered on them to meet current needs.
IR(1) -90	Jayn Johnson		Objecting	It should be up to individual Parishes to decide the Category A Affordable Housing allocation with reference to Parochial need	The proposed form of housing development is informed by the latest housing needs assessment. Occupancy of affordable homes will be controlled through the Housing Gateway but does not preclude occupancy by people with parish connections.
IR(1) -116	Karen Quenault		Objecting	As stated in Policy GD2 answer.	Presume reference should be Policy H1: see response
IR(1) -123	Mike Jackson		Objecting	socially challenging	This is principally a management issue. The design of the sites will support social inclusion through, amongst other principles, good design, layout and provision of open space.
IR(1) -17	Mr John Shenton		Objecting	As stated previously the proposed 80/20 split is not workable for predominantly social issues. Further work needs to be undertaken in relation the mix of development and the optimum size.	This is principally a management issue. The design of the sites will support social inclusion through, amongst other principles, good design, layout and provision of open space.
IR(1) -32	Mr Michael Stein	MSPlanning Ltd	Objecting	Should be 55%/45% split	Comment noted, but not evidenced by current needs.
IR(1) -121	Susie Pinel	States Member (St. Clement)	Objecting	A 50% -50% would be more reasonable given current housing shortage for 1st time buyers.	Comment noted, but not evidenced by current needs.
IR(1) -114	Carlo Riva	The Association of Jersey Architects	Supporting	No comment	Noted
IR(1) -25	Carlo Riva	Riva Architects Ltd	Supporting	No comment	Noted
IR(1) -49	Chris Lamy		Supporting	Supporting both these sites to be used for Category A, social housing.	These sites are already rezoned in the 2011 Island Plan for the purposes of delivering Category



Ref	Name	Agent/ Organisation	Supporting/ Objecting	Reasons for answer	Minister's Response
					A homes. The Minister's proposed amendment just seeks to amend the proportion and type of housing tenure to be delivered on them to meet current needs.
IR(1) -176	Martin Whitley	La Comité du Commune Rurale St. Jean	Supporting	The proposed development of former nursery sites for category A housing is a sensible use of land.	These sites are already rezoned in the 2011 Island Plan for the purposes of delivering Category A homes. The Minister's proposed amendment just seeks to amend the proportion and type of housing tenure to be delivered on them to meet current needs.
IR(1) -130	Mr Paul Harding	BDK Architects	Supporting	Supporting Policy H2 amendment as written.	Comment noted
IR(1) -23	Mr Peter Thorne		Supporting	This policy change should not affect the two sites referred to - both of which are advanced and one at least has commenced. The 80%/20% split should not be a policy but supplementary planning guidance as the mix will change quite regularly off the back of the biennial Housing Reviews	Comment noted. Any site that already has planning permission will not be subject to this policy amendment.

## Proposal H3: Affordable housing

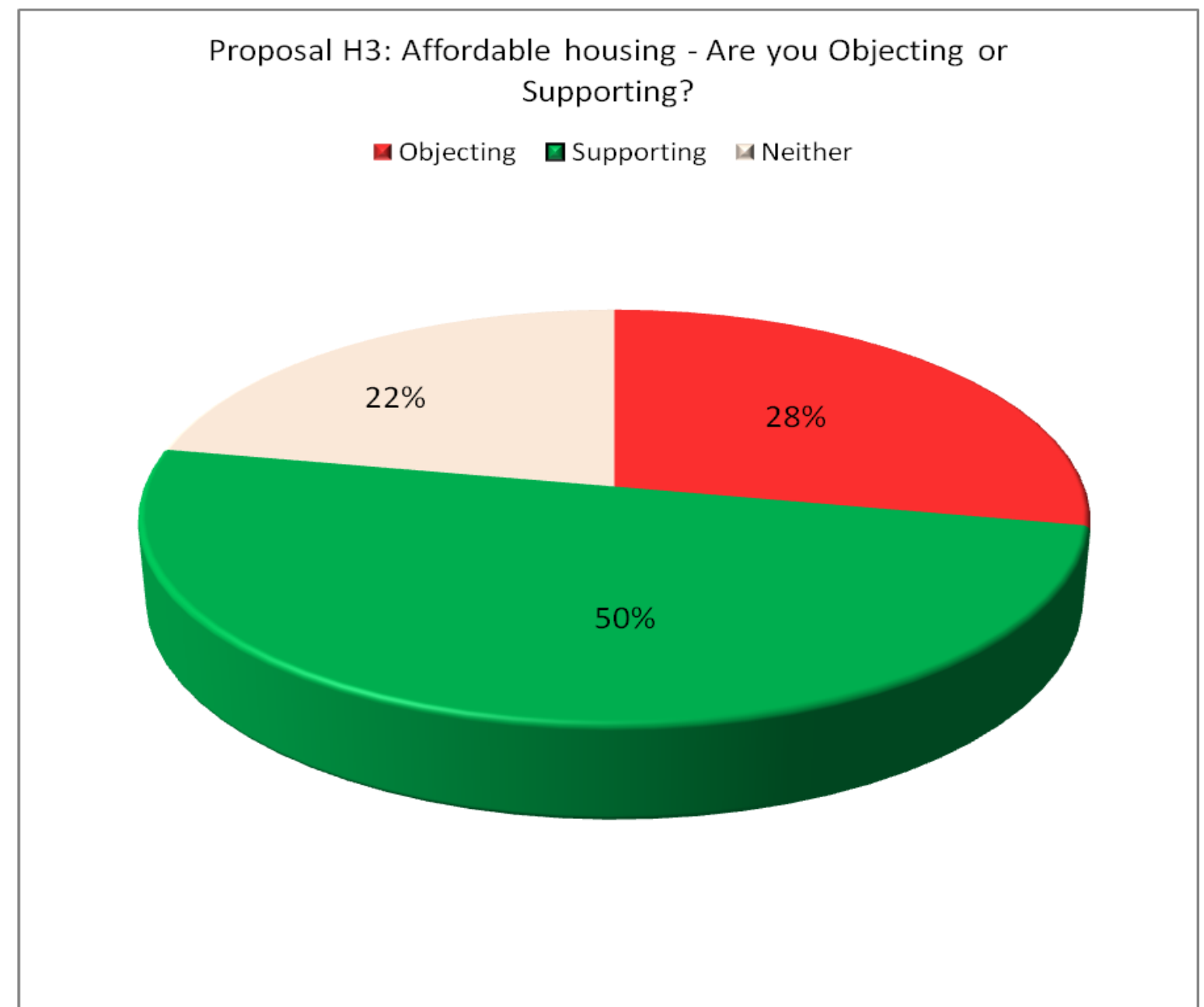
The Minister proposes that [Policy H3](#) be replaced with Proposal 3:

The policy requiring the provision of affordable homes as a proportion of private housing developments is to be set aside.

Work will be undertaken to research and develop alternative policy mechanisms to capture value from the development of land to support the provision of affordable homes. A Working Group comprising the Ministers of Treasury and Resources, Planning and Environment, Housing and Economic Development has been set up to progress this.

### Questionnaire consultation results

	% Total	% Answer	Count
<b>Number of responses</b>	23%	-	50
<b>Objecting</b>	6%	28%	14
<b>Supporting</b>	11%	50%	25
<b>Neither</b>	5%	22%	11
<b>[No response]</b>	77%	-	169
<b>Total</b>	<b>100%</b>	<b>100%</b>	<b>219</b>



## Proposal H3: Affordable housing - comments

Ref	Name	Agent/ Organisation	Supporting/ Objecting	Reasons for answer	Minister's Response
IR(1) -15	Mrs Rosemary Evans		Neither	Why? Also I do not think there is sufficient thought given to private development which is currently providing blocks of seemingly unwanted luxury flats remaining half empty	The basis for the setting aside of this policy mechanism is set out at paras. 6.107-6.110. Open market housing contributes towards the Island's overall housing need. The housing market has clearly been affected by the current economic climate.
IR(1) -6	Anonymous		Objecting	Another waste of time / cost, the H3 mantra has now been shown to be flawed but only after the States thought it a good idea for 4 years and then removed it !!!!!	Comment noted.
IR(1) -108	Anonymous		Objecting	Developers make healthy profits from these developments and I don't agree that profits would be eroded to such an extent that new developments would no longer be economically viable.	Work undertaken to introduce the policy and to assess its operation demonstrated that it was economically viable whilst acknowledging the risk that land might not be brought forward for development.
IR(1) -91	Anonymous		Objecting	If affordable Housing is required why remove a source? Again population is the key	The basis for the setting aside of this policy mechanism is set out at paras. 6.107-6.110.
IR(1) -11	Anonymous		Objecting	It doesn't work and that's why it was dropped	Work undertaken to introduce the policy and to assess its operation demonstrated that it was economically viable whilst acknowledging the risk that land might not be brought forward for development. The basis for the setting aside of this policy mechanism is set out at paras. 6.107-6.110.
IR(1) -114	Carlo Riva	The Association of Jersey Architects	Objecting	We fully support the removal of Policy H3 in its entirety. However, it is particularly disappointing that it has taken so long to arrive at this conclusion. Criticism of the Policy was forcefully made during the Examination in Public process. The strongly held views of the AJA were overlooked at that time - this decision was clearly an error, which has now cost the Island dearly. It should be implicit as part of the consultation process that due respect is given to the comments made by industry - they are not made whimsically and are considered carefully.	Work undertaken to introduce the policy and to assess its operation demonstrated that it was economically viable whilst acknowledging the risk that land might not be brought forward for development. The Minister does not accept that comments previously made were overlooked and/or not given serious consideration. All comments made in relation to the various drafts of the 2011 island Plan were carefully considered and subjected to independent expert scrutiny before being considered by the States Assembly.
				We strongly oppose the proposal to capture value from development land as we suggest this will have a very detrimental affect upon the construction industry.	The impact of any proposal to capture land value will be an integral part of its development. Any proposals will be subject to consultation.
IR(1) -25	Carlo Riva	Riva Architects Ltd	Objecting	We fully support the removal of Policy H3 in its entirety. However, it is particularly disappointing that it has taken so long to arrive at this conclusion. Criticism of the Policy was forcefully made during the Examination in Public process. The strongly held views of the AJA were overlooked at that time - this decision was clearly an error, which has now cost the Island dearly. It should be implicit as part of the consultation process that due respect is given to the comments made by industry - they are not made whimsically and are considered carefully.	Work undertaken to introduce the policy and to assess its operation demonstrated that it was economically viable whilst acknowledging the risk that land might not be brought forward for development. The Minister does not accept that comments previously made were overlooked and/or not given serious consideration. All comments made in relation to the various drafts of the 2011 island Plan were carefully considered and subjected to independent expert scrutiny before being considered by the States Assembly.
				We strongly oppose the proposal to capture value from development land as we suggest this will have a very detrimental affect upon the construction industry.	The impact of any proposal to capture land value will be an integral part of its development. Any proposals will be subject to consultation.
IR(1) -90	Jayn Johnson		Objecting	As before it should be left to the Parish	Any such proposal is likely to be developed to have an island-wide application and to be administered by the States as opposed to parochial authorities: the nature of a suitable vehicle to deliver this objective remains, however, to be determined.
IR(1) -17	Mr John Shenton		Objecting	The policy seems to go back to the old policy of putting social housing etc in one place whilst leaving most parishes unaffected. One has little choice but to object as the Working Party have published nothing to support this change of view. The burden should be spread amongst all parishes to create a greater sense of community. Once the Working party has completed its work then it can accurately evaluate whether the policy change is correct.	Comments noted.
IR(1) -26	Mrs Judy Martin		Objecting	I do not want this policy to go until I see a meaning to the words above (capture value from development of land to support the provision of affordable homes) sorry i need to now how and i need to know that now	The planning system can add value to land through the award of planning permission for development: the working party seeks to explore how some of this additional value might be directed towards public benefit (such as the delivery of affordable homes) rather than

Ref	Name	Agent/ Organisation	Supporting/ Objecting	Reasons for answer	Minister's Response
					going directly to the landowner.
IR(1) -16	Anonymous		Supporting	As long as the revised policy mechanism properly captures relevant value there is no need to be so specific	Comments noted.
IR(1) -49	Chris Lamy		Supporting	H3 is totally necessary.	Comments noted.
IR(1) -177	Deputy John Le Fondré	States Member (St.Lawrence)	Supporting	I welcome the move to remove the originally proposed H3 policy which was extremely controversial. I think we need to consider whether this is likely to be seen as a move towards some form of capital gains tax, which I would NOT support, as I think it would send the wrong message from an Island which is a reputable finance centre. I WOULD be supportive of some form of levy on development, principally designed to discourage green field development and encourage urban (brown field) development, rather than as a money raising exercise.	Comments noted.
IR(1) -176	Martin Whitley	La Comité du Commune Rurale St. Jean	Supporting	The Comité would like the Minister to consider other forms of planning gain from permitted developments such as Parish infrastructure improvements e.g. the extension of mains water and drainage.	The impact of development upon local infrastructure can already be offset by planning gain where it is reasonable, proportionate and related to the development. The proposal is to establish whether it is appropriate to secure wider public benefit from the creation of development value.
IR(1) -173	Mr M Cotillard	Jersey Construction Council	Supporting	Finally, the removal of Policy H3 is to be welcomed, but there is concern that a working party made up of the Ministers from Treasury, Planning, Economic development and Housing, has been formed to effectively find an alternative method of extracting "up lift values" from sites that get planning permission. The Jersey Construction Council feels strongly that there should be industry representation on this working party, to make sure that there isn't a repeat of the saga that lead to the H3 Policy being introduced, when Industry had said from day one that it would not work in Jersey. We would like to formally ask that a representative from the Jersey Construction Council be appointed to represent Industry on this Working Party.	Comments noted. The composition of the Working Party is not material to a review of the Plan but will be given due consideration.
IR(1) -32	Mr Michael Stein	MSPlanning Ltd	Supporting	This policy has been an unmitigated disaster and should not be countenanced again. This model is unworkable in Jersey.	The policy remained to be implemented and cannot therefore be deemed to be 'disastrous'. Furthermore, it was not envisaged that Policy H3 would begin to deliver significant amounts of affordable homes until the second half of the Plan period. Work undertaken to introduce the policy and to assess its operation demonstrated that it was economically viable whilst acknowledging the risk that land might not be brought forward for development.
IR(1) -130	Mr Paul Harding	BDK Architects	Supporting	Supporting withdrawal of Policy H3, but Strongly Objecting to introduction of the suggested " alternative policy mechanisms " We fully support the removal of Policy H3 in its entirety. However, it is particularly disappointing that it has taken so long to arrive at this conclusion. Criticism of the Policy was forcefully made during the Examination in Public process for the original draft 2011 Island Plan. The strongly held views of the AJA were overlooked at that time - this decision was clearly an error, which has now cost the Island dearly. It should be implicit as part of the consultation process that due respect is given to the comments made by industry - they are not made whimsically and are considered carefully.	Work undertaken to introduce the policy and to assess its operation demonstrated that it was economically viable whilst acknowledging the risk that land might not be brought forward for development. The Minister does not accept that comments previously made were overlooked and/or not given serious consideration. All comments made in relation to the various drafts of the 2011 island Plan were carefully considered and subjected to independent expert scrutiny before being considered by the States Assembly.
				We strongly oppose the proposal to capture value from development land as we suggest this will have a very detrimental affect upon the construction industry.	The impact of any proposal to capture land value will be an integral part of its development. Any proposals will be subject to consultation.
IR(1) -23	Mr Peter Thorne		Supporting	This policy would never have worked because of the high existing land values in Jersey	Work undertaken to introduce the policy and to assess its operation demonstrated that it was economically viable whilst acknowledging the risk that land might not be brought forward for development.
IR(1) -43	Mr Marc Burton	Institute of Directors	Supporting	We note that a working party has been established but the IoD feel very strongly that industry representatives should also be present from the Jersey Construction Council to aid in finding a solution but also to reduce time in consultation.	Comments noted. The composition of the Working Party is not material to a review of the Plan but will be given due consideration.

Ref	Name	Agent/ Organisation	Supporting/ Objecting	Reasons for answer	Minister's Response
				This will ensure a balanced view is found and a workable solution is attained for all parties;	
IR(1) -181	Vivien Vibert			<p>Again, paragraphs have been deleted or altered without it being shown. That "development industry and landowning interests remain fundamentally opposed to the principle of Policy H3" is no reason to get rid of this Policy. It is exactly the sort of policy needed to ensure that affordable homes are built rather than over-priced places for the wealthy, whereby developers make more money. Slotting in smaller houses, flats, bedsits and so forth into more expensive developments makes for a more socially varied community, so has valuable side-effects.</p> <p>This is a clear case of pandering to the development industry and should be rejected.</p>	Comments noted.

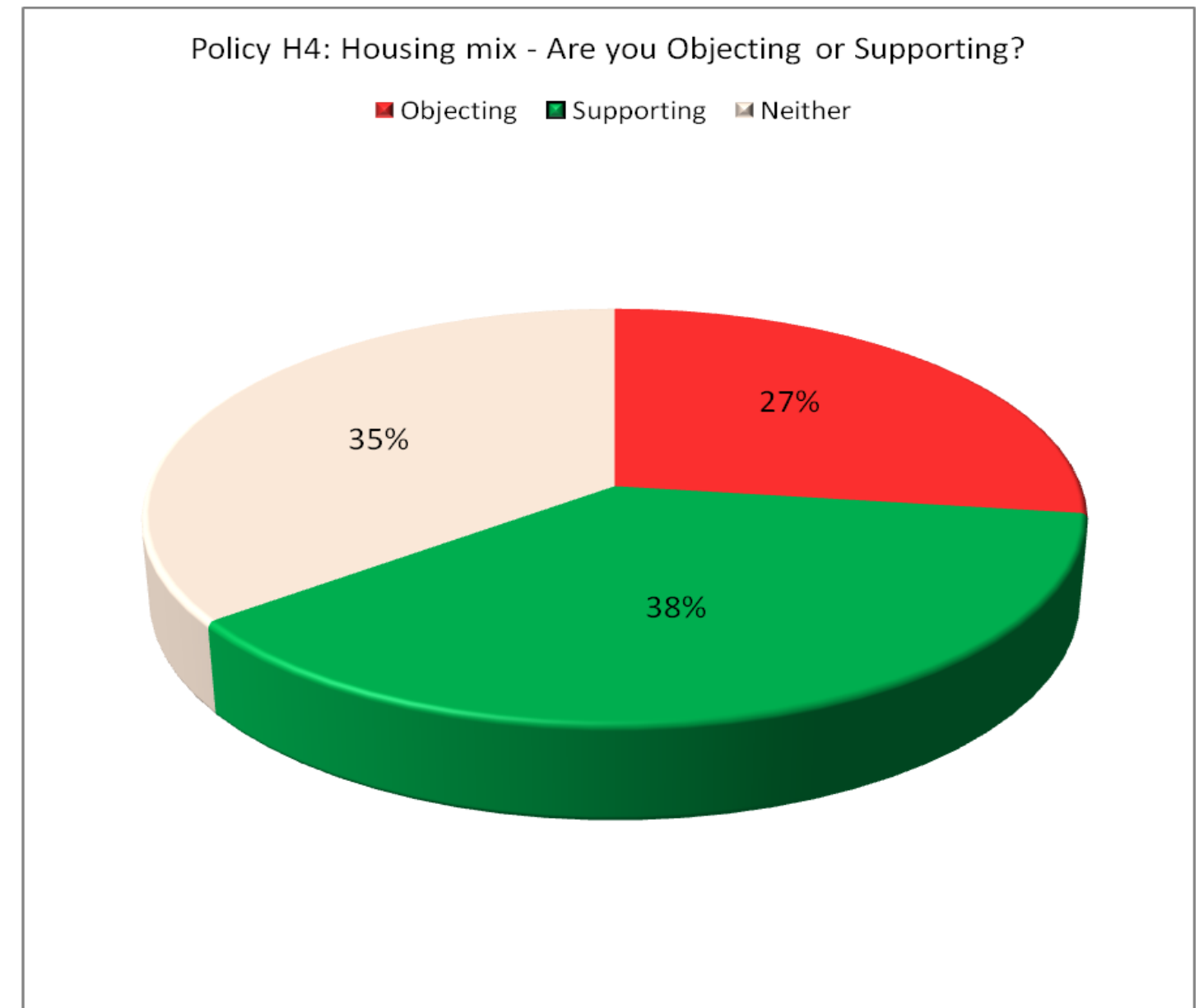


## Policy H4: Housing mix

The Minister for Planning and Environment proposes to amend Policy H4 to clarify that the latest evidence of housing need will be in the form of the Housing Needs Survey, as opposed to supplementary planning guidance.

### Questionnaire consultation results

	% Total	% Answer	Count
<b>Number of responses</b>	22%	-	48
<b>Objecting</b>	6%	27%	13
<b>Supporting</b>	8%	38%	18
<b>Neither</b>	8%	35%	17
<b>[No response]</b>	78%	-	171
<b>Total</b>	<b>100%</b>	<b>100%</b>	<b>219</b>



## Policy H4: Housing mix - comments

Ref	Name	Agent/ Organisation	Supporting/ Objecting	Reasons for answer	Minister's Response
IR(1) -91	Anonymous		Neither	should this also be looking at future needs - they may go down? Population??	It is proposed that Policy H4 will be based on latest evidence of need
IR(1) -5	L & M Howard		Neither	This Survey is fundamentally flawed and I am amazed anyone takes it seriously. It is a survey of wants, not needs. On an island this size, what people want, because immigration has been let rip, cannot be provided in any reasonable way.	The Housing Needs Survey provides a detailed picture of supply and demand resulting from the stated intentions of Jersey households. It also provides detailed analysis of affordability as well as the requirements of first-time buyers.
IR(1) -67	Mr James Godfrey	Royal Jersey Agricultural & Horticultural Society	Neither	There must be great care taken using any 'surveys' as evidence as these can be misleading - a good example being the 'lists' held by some parishes regarding demand for over 55 housing.	The Housing Needs Survey provides a detailed picture of supply and demand resulting from the stated intentions of Jersey households. It also provides detailed analysis of affordability as well as the requirements of first-time buyers.
IR(1) -85	N Melton		Neither	Unless we know how many people care coming in, and unless we can control Immigration how on earth do you know what you need?	The Housing Needs Survey results enables greater analysis to be undertaken to examine the effects of different scenarios of net migration.
IR(1) -6	Anonymous		Objecting	Another waste of time as the figures are always wrong !	The Housing Needs Survey provides a detailed picture of supply and demand resulting from the stated intentions of Jersey households. It also provides detailed analysis of affordability as well as the requirements of first-time buyers. It is acknowledged that the report provides estimates of potential housing requirement but is based on the best information available.
IR(1) -10	Anonymous		Objecting	first make a check on all empty properties in the Island and then make a decision	One in fourteen private dwellings (7%) were vacant at the time of the 2011 Census in Jersey (cf. 6% in 2001). Although there was no requirement for householders to give reasons for properties being vacant, some reasons were provided for around half of properties listed as vacant. Over a quarter (29%) were vacant due to being between tenants, and nearly a quarter (23%) were second or holiday homes. Around one in five were in the process of being built or renovated.
IR(1) -13	Anonymous		Objecting	The Housing Needs Survey is not an accurate statement on which to base "need". It is a Survey of what people "want" and we have to realise live in a small island which simply cannot reasonably accommodate everything that people might "want" in terms of housing. I would have to see far more rigorous "published evidence of need" to be able to support the proposed politically driven approach.	The Housing Needs Survey provides a detailed picture of supply and demand resulting from the stated intentions of Jersey households. It also provides detailed analysis of affordability as well as the requirements of first-time buyers.
IR(1) -87	Anonymous		Objecting	This seems to give a significant amount of individual power, whether delegated or not, to the Minister. A survey in itself whilst useful as an indicator, should not give anyone carte Blanche to make decisions or impose restrictions or requirements.	The Housing Needs Survey provides a detailed picture of supply and demand resulting from the stated intentions of Jersey households. It also provides detailed analysis of affordability as well as the requirements of first-time buyers. It is acknowledged that the report provides estimates of potential housing requirement but is based on the best information available and provides a basis upon which more informed decisions can be made.
IR(1) -90	Jayn Johnson		Objecting	This should be a local Parish decision, not an Island -wide one	This report provides estimates of Jersey's potential housing requirements in terms of the type, tenure and size of dwelling unit and the Minister will seek to use this to inform decisions about the mix of housing types provided in residential development to better meet the Island's needs. If additional evidence, that is similarly robust and representative, can be provided about parish-specific requirements in relation to the mix of housing types then the Minister will be minded to consider this.
IR(1) -176	Martin Whitley	La Comité du Commune Rurale St. Jean	Objecting	The Comité challenges the integrity of the Housing Needs Survey as it is only an estimate of housing supply and demand and therefore subjective. The frequency of the survey and the publication of its results introduces a time lag risk. The Housing Needs Survey results, and housing supply and demand, have to be intrinsically linked to the on-going debate over the islands population control.	The Housing Needs Survey provides a detailed picture of supply and demand resulting from the stated intentions of Jersey households. It also provides detailed analysis of affordability as well as the requirements of first-time buyers. It is acknowledged that the report provides estimates of potential housing requirement but is based on the best information available and provides a basis upon which more informed decisions can be made.
IR(1) -30	Mr Martin		Objecting	I am not convinced the evaluation of Housing need is researched to a level of accuracy.	The Housing Needs Survey provides a detailed picture of supply and demand resulting

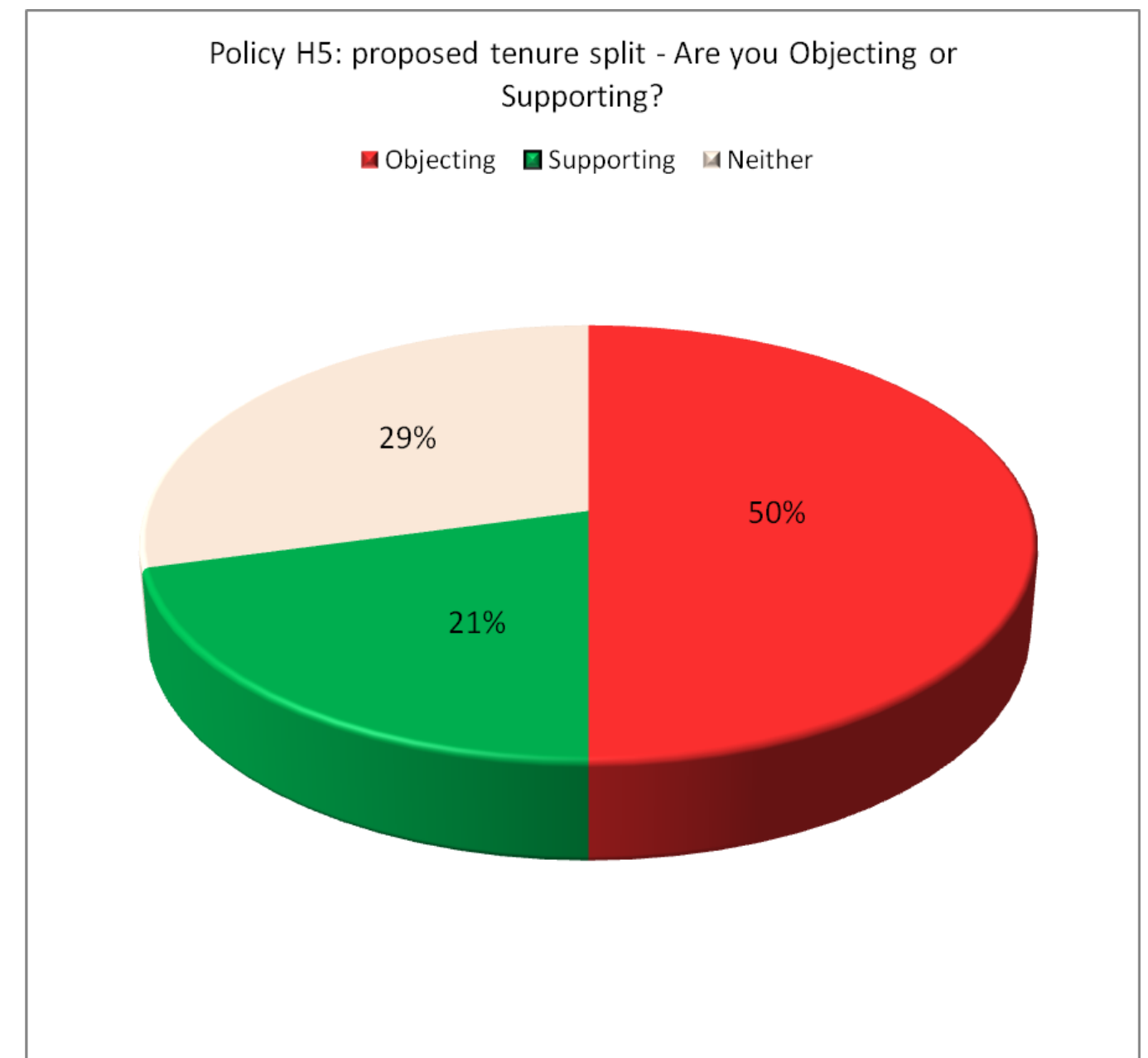
Ref	Name	Agent/ Organisation	Supporting/ Objecting	Reasons for answer	Minister's Response
	Whitley			The very concept of separation of need from value allows too much subjectivity.	from the stated intentions of Jersey households. It also provides detailed analysis of affordability as well as the requirements of first-time buyers. It is acknowledged that the report provides estimates of potential housing requirement but is based on the best information available.
IR(1) -23	Mr Peter Thorne		Objecting	While well-intended, the policy will not work in practice. The 'mix' at the planning permission stage, the time taken through the pre-contract and construction phases, will in all likelihood be different upon completion.	It is acknowledged that the report provides estimates of potential housing requirement over a three year period but is based on the best information available and is designed to ensure that the mix of home is better targeted to need.
IR(1) -16	Anonymous		Supporting	To have firm and objective evidence must be a positive thing if it will clearly identify the extent of development that is needed.	Comment noted.
IR(1) -114	Carlo Riva	The Association of Jersey Architects	Supporting	No comment	Comment noted.
IR(1) -25	Carlo Riva	Riva Architects Ltd	Supporting	No comment.	
IR(1) -49	Chris Lamy		Supporting	But again not a mix of social housing with affordable purchase housing.	Comment noted.
IR(1) -17	Mr John Shenton		Supporting	The policy should be flexible to respond to current needs and requirements.	It is acknowledged that the report provides estimates of potential housing requirement over a three year period but is based on the best information available and is designed to ensure that the mix of home is better targeted to need. The policy is designed to be flexible to respond to new evidence.
IR(1) -130	Mr Paul Harding	BDK Architects	Supporting	Supporting Policy H4 amendment as written.	Comment noted.
IR(1) -15	Mrs Rosemary Evans		Supporting	It might improve the current policy which does not seem to be working	Comment noted.

## Policy H5: proposed tenure split.

The Minister for Planning and Environment is proposing to amend Policy H5 to rezone three sites for the provision of Category A housing. It is proposed that, to better meet current housing needs, the required tenure split on all of these sites is 80% social rental and 20% affordable homes for purchase.

### Questionnaire consultation results

	% Total	% Answer	Count
<b>Number of responses</b>	22%	-	48
<b>Objecting</b>	11%	50%	24
<b>Supporting</b>	5%	21%	10
<b>Neither</b>	6%	29%	14
<b>[No response]</b>	78%	-	171
<b>Total</b>	<b>100%</b>	<b>100%</b>	<b>219</b>



**Policy H5: proposed tenure split – comments**

Ref	Name	Agent/ Organisation	Supporting/ Objecting	Reasons for answer	Minister's Response
IR(1) -100	Mrs Stephanie Steedman		Neither	Ensure split is viable	Most sites will have an agricultural land value and this will be considerably lower than the proposed affordable housing values and will encourage their viable development.
IR(1) -13	Anonymous		Objecting	My previous comments on tenure split (prefer 45/55 split) apply.	Comments noted but not evidenced by current needs
IR(1) -4	Anonymous		Objecting	should be more affordable homes	Comments noted: the entire yield from the site is proposed to be for affordable homes. The proposed split of 80% for social rents and 20% for purchase is based on current evidence.
IR(1) -90	Jayn Johnson		Objecting	Far too prescriptive and inflexible	Comment noted, but not currently evidenced. The delivery of affordable housing is an Island wide issue and each site will need to be dealt with equitably.
IR(1) -176	Martin Whitley	La Comité du Commune Rurale St. Jean	Objecting	This is too restrictive as per Policy H1 comments. The split is too rigid and the Comité believes more flexibility should apply to site specific proposals. The split should be considered on a needs basis. The Comité believes that this may create zero value of developed land as there will be very little profit in any scheme going forward due to this potential mix. Therefore, it may mean that no affordable homes come forward in the private sector.	Comment noted, but not currently evidenced. The delivery of affordable housing is an Island wide issue and each site will need to be dealt with equitably. Most sites will have an agricultural land value and this will be considerably lower than the proposed affordable housing values and will encourage their viable development.
IR(1) -123	Mike Jackson		Objecting	I wouldn't expect it to work in areas	Comments noted, but housing mixes have been successful on other rural housing developments and can be socially cohesive.
IR(1) -17	Mr John Shenton		Objecting	Please refer to previous comment re the 80/20 split. One would like to see detailed research that this creates the best living environment. The policy seems to be aimed at all sites no matter their surroundings, density or location relevant to amenities. Surely the policy must be sufficiently flexible to take all aspects into account and not just settle for a 80/20 split.	Comment noted, but not currently evidenced. The delivery of affordable housing is an Island wide issue and each site will need to be dealt with equitably.
IR(1) -32	Mr Michael Stein	MSPlanning Ltd	Objecting	Should be 55%/45% split	Comments noted but not evidenced by current needs
IR(1) -122	Mr Peter Troy	Troy Developments Ltd	Objecting	Should be 50/50 AT LEAST	Comments noted but not evidenced by current needs
IR(1) -48	President Graham J Le Lay	JERSEY FARMERS' UNION	Objecting	Where the construction of Category "A" affordable housing does take place we are not supportive of the proposal to amend Policy H5 and introduce a required tenure split of 80% social rental and 20% Category "A" affordable homes for purchase which we believe would make sites unviable. We therefore propose leaving the split as it is which we believe to be a fairer split. Having produced many sites thus far, we see no reason why this should not do so in the future.	Comment noted, but not currently evidenced. The delivery of affordable housing is an Island wide issue and each site will need to be dealt with equitably. Most sites will have an agricultural land value and this will be considerably lower than the proposed affordable housing values and will encourage their viable development.
IR(1) -16	Anonymous		Supporting	Provided planning think these sites are suitable (bearing in mind e.g. objections raised by TTS to St Ouen given remote location).	Comments noted, all sites have been subject to a site assessment.
IR(1) -114	Carlo Riva	The Association of Jersey Architects	Supporting	No comment	Comment noted
IR(1) -25	Carlo Riva	Riva Architects Ltd	Supporting	No comment.	Comment noted
IR(1) -49	Chris Lamy		Supporting	But again not with a mix of social housing with affordable purchased housing on the same site.	Comments noted, but housing mixes have been successful on other rural housing developments and can be socially cohesive.
IR(1) -30	Mr Martin Whitley		Supporting	Only supported if the Planning Department support village plans. Experience to date demonstrates the opposite.	The Minister for Planning and Environment supports the development of village plans and will seek to adopt them as supplementary planning guidance where they



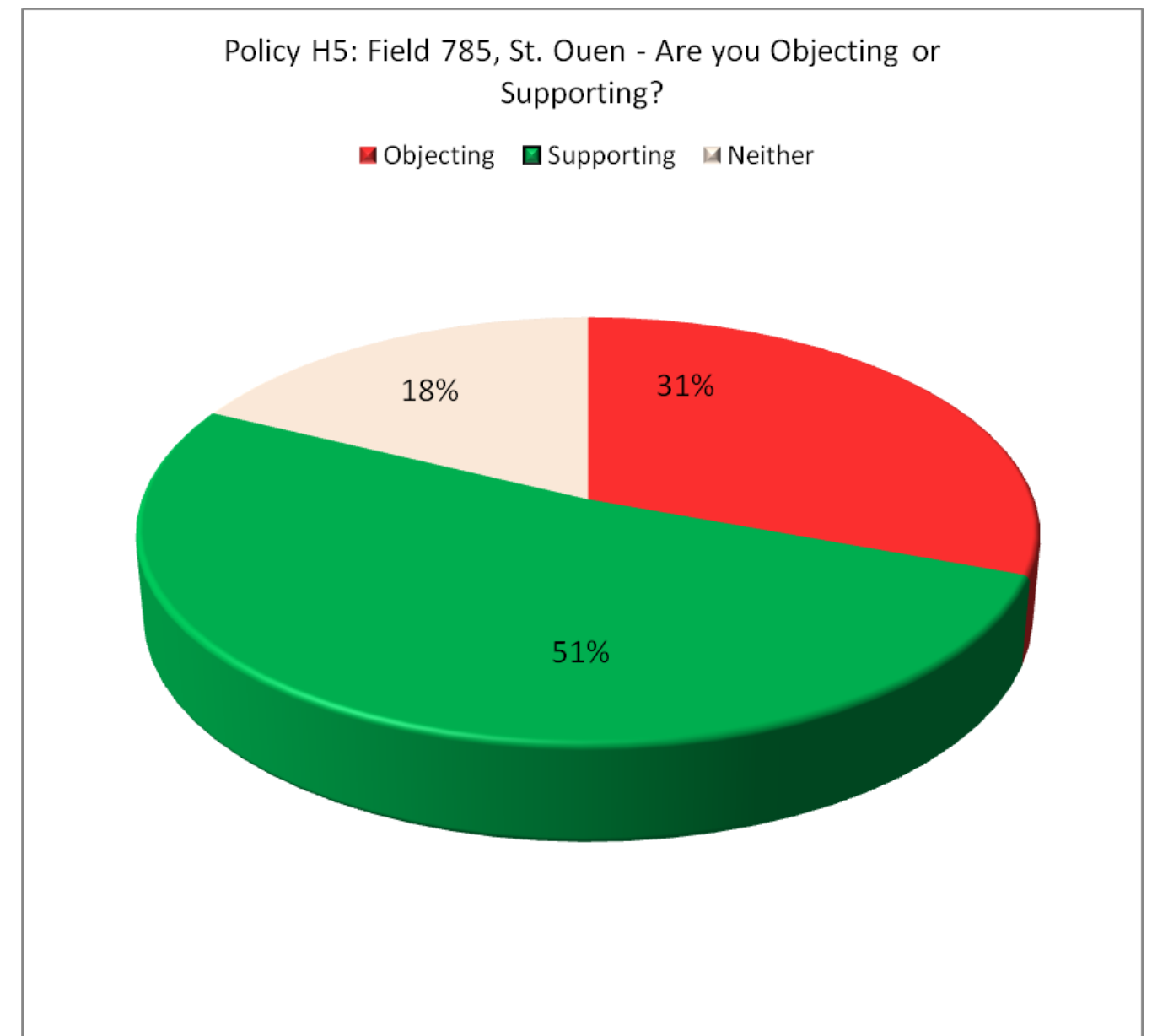
Ref	Name	Agent/ Organisation	Supporting/ Objecting	Reasons for answer	Minister's Response
				More support needed by qualified Planning staff and less civil service opinion.	complement and add value to the existing planning policy framework. The civil servants who advise the Minister on planning matters are qualified planners.
IR(1) -130	Mr Paul Harding	BDK Architects	Supporting	Supporting Policy H5 amendment as written.	Comment noted
IR(1) -23	Mr Peter Thorne		Supporting	The 80%/20% split should not be a policy but supplementary planning guidance as the mix will change quite regularly off the back of the biennial Housing Reviews.	Comment noted, although the split is related to specific sites that are expected to be delivered in the short term and so the need for a more flexible longer-term approach is negated.
IR(1) -26	Mrs Judy Martin		Supporting	again needs to be flexible	The proposed amendment is based on the latest evidence of need. The Strategic Housing Unit will control who accesses affordable housing through the gateway criteria.
IR(1) -15	Mrs Rosemary Evans		Supporting	Sensible	Comment noted

## Policy H5: Field 785, St. Ouen.

The Minister for Planning and Environment is proposing to re-zone Field 785, St. Ouen for affordable housing under [policy H5](#)

### Questionnaire consultation results

	% Total	% Answer	Count
<b>Number of responses</b>	28%	-	62
<b>Objecting</b>	9%	31%	19
<b>Supporting</b>	15%	52%	32
<b>Neither</b>	5%	18%	11
<b>[No response]</b>	72%	-	157
<b>Total</b>	<b>100%</b>	<b>10%</b>	<b>219</b>



**Policy H5: Field 785, St. Ouen - comments**

Ref	Name	Agent/ Organisation	Supporting/ Objecting	Reasons for answer	Minister's Response
IR(1) -87	Anonymous		Neither	I am unqualified to take a view as I don't know where this field is.	Comment noted.
IR(1) -177	Deputy John Le Fondré	States Member (St.Lawrence)	Neither	Provided this is supported by the Parish (Constable / Parish Assembly) and the Deputy, I can probably support the redevelopment of this site.	Comment noted.
IR(1) -65	Anonymous		Objecting	the high density of housing in the area	Policy GD3 of the 2011 Island Plan seeks to ensure that the highest reasonable density is achieved for all developments that is commensurate with good design. The character and form of the existing village settlement is sub-urban, consisting of detached and semi-detached family housing and consistent with the typical residential density of this type of settlement.
				the impact on traffic	TTS: do not support this site because of its remoteness from community facilities which will result in most journeys being made by car. If the land is rezoned certain road improvement works would be required to improve a local road junction.
				pressure on local resources such as schools	The current and future ability of local schools to accommodate anticipated demand for places is material and ESC has advised that there is capacity.
				the importance of maintaining green land - possibly for allotments	The Minister acknowledges the importance of protecting the countryside and has sought to identify those sites which have already been subject to some form of development on the edge of the existing built-up area as having the potential to contribute to the Island's housing needs.
IR(1) -39	Anonymous		Objecting	agricultural land	The Minister acknowledges the importance of protecting the countryside and has sought to identify those sites which have already been subject to some form of development on the edge of the existing built-up area as having the potential to contribute to the Island's housing needs.
IR(1) -13	Anonymous		Objecting	Green Zone, should be left alone. The 2011 Island Plan is for the whole Island and individual parishes should not be permitted to nibble away at it.	The Minister acknowledges the importance of protecting the countryside and has sought to identify those sites which have already been subject to some form of development on the edge of the existing built-up area as having the potential to contribute to the Island's housing needs.
				If revisions are required they should only be as part of the next Plan review, if only to give long suffering residents near sites like this some respite and certainty from processes like this one!	The Minister is proposing amendment to the 2011 Island Plan principally to deal with a projected shortfall in housing supply for affordable homes and to help address the issue of housing affordability.
IR(1) -4	Anonymous		Objecting	more encroachment	The Minister acknowledges the importance of protecting the countryside and has sought to identify those sites which have already been subject to some form of development on the edge of the existing built-up area as having the potential to contribute to the Island's housing needs.
IR(1) -7	Anonymous		Objecting	More green space disappearing.	The Minister acknowledges the importance of protecting the countryside and has sought to identify those sites which have already been subject to some form of development on the edge of the existing built-up area as having the potential to contribute to the Island's housing needs.
IR(1) -62	John Davis		Objecting	The purpose of field 785 and 622 in the rural parishes, sling with St Martin relates to the need to ensure the rural parishes don't have an ageing population. Les Landes school has had one of its largest Reception year intakes. Accordingly young families with children are well established in St Ouen. To build more sites will add additional pressure and therefore need for an additional school in the parish.	The current and future ability of local schools to accommodate anticipated demand for places is material and ESC has advised that there is capacity.
IR(1) -5	L & M Howard		Objecting	If it is the Green Zone it should remain there for at least the life of the 2011 Island Plan. If it is glasshouses, they should be cleared and the land returned to agricultural production, given the taxpayer has no doubt already subsidised the landowner with grants for just that purpose.	The Minister acknowledges the importance of protecting the countryside and has sought to identify those sites which have already been subject to some form of development on the edge of the existing built-up area as having the potential to contribute to the Island's housing needs.

Ref	Name	Agent/ Organisation	Supporting/ Objecting	Reasons for answer	Minister's Response
IR(1) -8	Mr Bob Henkhuzens		Objecting	The site should remain for agricultural purposes only. It is curious that the driver for the change is claimed to be a shortage of housing - a look at Friday's JEP will show pages and pages of houses and flats for sale.... The Island's government continues to fail to accept that the electorate are concerned about the increasing Island population - building more houses will not help to constrain this growth. Every piece of rural space that is lost will be lost forever. Furthermore for each piece that is lost, there will undoubtedly be a subsequent application to change the use of yet another piece of land next to one lost. A suspicion must surely be that the proposal is driven by the profit that will be made by the developer/land owner, and thus not concerned with the needs, rights and adverse effects on the majority of the current Island community, nor those of the neighbouring households. As regards this and the other proposals referred to in this consultation, the impact on traffic flows and the adequacy of and impacts on the roads and access to public services systems do not seem to be included as part of the assessment.	Noted, however the houses being offered for sale are not in the affordable price bracket. Although the Highway Engineers do not support the site because of its remoteness from community facilities, they have advised that if the land is rezoned then they recommend certain road improvement works to take place to manage the traffic impact.
				The site should remain for agricultural purposes only.	The Minister acknowledges the importance of protecting the countryside and safeguarding agricultural land but has sought to identify those sites which have already been subject to some form of development, albeit for agricultural purposes, on the edge of the existing built-up area as having the most potential to contribute to the Island's housing needs..
				It is curious that the driver for the change is claimed to be a shortage of housing - a look at Friday's JEP will show pages and pages of houses and flats for sale.... The Island's government continues to fail to accept that the electorate are concerned about the increasing Island population - building more houses will not help to constrain this growth. Every piece of rural space that is lost will be lost forever. Furthermore for each piece that is lost, there will undoubtedly be a subsequent application to change the use of yet another piece of land next to one lost. A suspicion must surely be that the proposal is driven by the profit that will be made by the developer/land owner, and thus not concerned with the needs, rights and adverse effects on the majority of the current Island community, nor those of the neighbouring households.	The decision to provide more affordable and social housing is a key action of the States Strategic Plan 2012. The latest evidence on affordability indicates that open market housing is beyond the reach of many people in Jersey (see: <a href="http://www.gov.je/Government/JerseyWorld/StatisticsUnit/Prices/Pages/HousingAffordability.aspx">http://www.gov.je/Government/JerseyWorld/StatisticsUnit/Prices/Pages/HousingAffordability.aspx</a> )
				As regards this and the other proposals referred to in this consultation, the impact on traffic flows and the adequacy of and impacts on the roads and access to public services systems do not seem to be included as part of the assessment.	The site assessment, at Appendix B of the proposed amendment, sets out the considerations relating to the potential impact of the development of these sites upon the local infrastructure. The current and future ability of local schools to accommodate anticipated demand for places is material and ESC has advised that there is capacity. TTS: do not support this site because of its remoteness from community facilities which will result in most journeys being made by car. If the land is rezoned certain road improvement works would be required to improve a local road junction.
IR(1) -191	Mr Charles Prouten		Objecting	I am writing in response to the proposed rezoning of field 785 in St. Ouen for category A housing. Although we have no objection to the plan we feel we must try to protect our property La Fontaine Farm which is directly adjoining to the east of field 785. Firstly, field 785 is 4-5 feet higher than our property, if 2 storey houses are built close to the boundary they will overlook our home and will be able to see directly into our kitchen window. The window is 8 feet wide and the kitchen is a room in which we spend much of our time. This will greatly infringe on our privacy and enjoyment of this property. I feel that a permanent physical barrier will be needed to prevent this, such as an earth mound, concrete walls or substantial fencing. You may say that trees and shrubs will be planted along the boundary but as with our experience of Clos de Vautier which was built next to field 783 at the rear of our property, this is not sufficient. Some trees died, many were trampled by children and some even cut down by the tenants/owners. They also do very little to stop noise pollution and trespassing all of which has affected the enjoyment of our space at the rear of	In the event that this site is rezoned, the size and specific siting of homes on each site will be determined through the planning process having regard to all material planning considerations, such as the protection of the amenities of adjacent residents. The development of any existing buildings on neighbouring properties will be subject to the same planning considerations to ensure that residents can enjoy a reasonable level of amenity in their homes.

Ref	Name	Agent/ Organisation	Supporting/ Objecting	Reasons for answer	Minister's Response
				<p>our property where we used to spend a lot of our leisure time. I therefore ask that if houses have to be built in field 784 that they are not built too close to the boundary, not too high and that some sort of physical barrier is put in between them and our property.</p> <p>Secondly, we have a large granite barn which faces west towards field 785 which we hope to develop in the near future. Will this barn be deemed as overlooking the proposed housing? Stopping us developing it even though the building was there long before the proposed properties which are likely to overlook us! Some sort of guarantee that this will not happen would be an advantage.</p> <p>I hope you will take notice of these points and although I realise building has to go on, surely it cannot be a great cost to other properties which were there many years before and which we have put a lot of financial commitment to.</p>	
IR(1) -64	Mr David Brown		Objecting	<p>The over development of this once rural area continues to degrade the general locale in St Ouen. The addition of yet another closely packed box type estate with no regard to the massive increase in vehicular access on what is already a very dangerous junction, is hardly what is needed in this once peaceful area.</p> <p>The States would be derelict in its duties of care if it attempted to place yet another road junction in between the current estate outlet and Rue de Trodez and so, without compulsory purchase and knocking down other properties I fail to see how the addition of possibly 100 more cars could do anything but endanger the local community as well as the local school and its students, many of whom, attempt to walk down this already narrow road. There being no possibility of widening the road I fail to see how this plan can be supported.</p> <p>One child run down is not worth the pressure to squeeze more houses into such a crowded area.</p>	<p>The site assessment, at Appendix B of the proposed amendment, sets out the considerations relating to the potential impact of the development of these sites upon the local infrastructure.</p> <p>The current and future ability of local schools to accommodate anticipated demand for places is material and ESC has advised that there is capacity.</p> <p>TTS: do not support this site because of its remoteness from community facilities which will result in most journeys being made by car. If the land is rezoned certain road improvement works would be required to improve a local road junction.</p>
IR(1) -67	Mr James Godfrey	Royal Jersey Agricultural & Horticultural Society	Objecting	The access is insufficient.	TTS: do not support this site because of its remoteness from community facilities which will result in most journeys being made by car. If the land is rezoned certain road improvement works would be required to improve a local road junction.
IR(1) -130	Mr Paul Harding	BDK Architects	Objecting	<p>In relation to Field 785, St Ouen the Site Assessment in Appendix B identifies this site is " remote from facilities and amenities ", going onto conclude in the Traffic section the site is " in a very isolated location ". The assessment also determines road improvement works would be required at junction of La Rue a La Pendue &amp; La Rue des Cosnets before this site became viable to receive housing, which will be damaging to the character of this area.</p> <p>We question the appropriateness of rezoning such sites as this one for Category A Affordable Housing and suggest there are plenty of more suitable sites available elsewhere which are better related to facilities and amenities.</p>	Whilst it is acknowledged that the site is remote from some facilities, it is an existing glasshouse complex which is on the edge of an existing community, in walking distance to and existing primary school and could be reasonably integrated into the built-up area.
IR(1) -23	Mr Peter Thorne		Objecting	<p>The site location does not satisfy Policy SP1.</p> <p>A site closer to the nucleus of St Ouen's Village would be far better.</p>	<p>The Minister does not accept that the proposed zoning of this site does not satisfy Policy SP1: SP1 ;(2) &amp; (3) could support the proposal.</p> <p>It is, however, acknowledged that whilst the site is remote from some facilities, it is an existing glasshouse complex which is on the edge of an existing community, in walking distance to and existing primary school and could be reasonably integrated into the built-up area.</p>
IR(1) -206	Paul Le Marrec		Objecting	<p>I object to the proposed rezoning of green zone land specifically Fields 622 and 785 in St Ouen and 402 in St. Martin.</p> <p>To rezone such land prior to the 2014 Housing Needs Survey is premature given the projected surplus of A and B category housing already identified for the period to 2020. In addition, an independent assessment of the demand for properties in the specific locations should be undertaken.</p>	The Minister's proposed amendment which seeks to provide additional housing supply is based on the latest evidence of housing supply, demand and affordability provided by the 2012 Housing Needs Survey (undertaken as part of JASS); the Housing Affordability Report and the latest Residential Land Availability report: any response made in relation to this data is not considered to be premature and is required to be undertaken if the Island's housing needs are to be eased.



Ref	Name	Agent/ Organisation	Supporting/ Objecting	Reasons for answer	Minister's Response
				Prior to any further loss of rural land alternative sites in the built up area should be considered; including the potential redevelopment of existing vacant (and potentially vacant) offices given the significant planned office developments currently in train at the Esplanade and other sites.	The thrust of the Spatial Strategy of the 2011 Island Plan remains unaltered by the Minister's proposed amendments such that most of the Island's development needs should be met from within the existing built-up area: the proposed rezoning of land would, in total, provide about 350 homes out of a total supply of over 3,500.
IR(1) -48	President Graham J Le Lay	JERSEY FARMERS' UNION	Objecting	<p>One of the main objectives of the Jersey Farmers' Union is to maintain a Policy of preserving agricultural land to ensure the continuance of a viable Agricultural / Horticultural Industry for the benefit of farmers and growers and the Island as a whole. There is currently a strong demand for agricultural land throughout the Island. This can be evidenced by all viable agricultural land, be it large areas or small pockets of land previously being uncultivated, now being utilised. All grades of land from prime agricultural land, secondary quality land, pastureland and meadowland can serve a purpose within the Industry; be it for the cultivation of all crops to bovine grazing for the Dairy Industry.</p> <p>The supply of agricultural land is finite and this must be safeguarded. Farmers and growers are the guardians of the countryside and a viable Agricultural Industry is the most cost-effective way of managing the environment. The preservation and protection of agricultural land will encourage a sustainable and diverse Agricultural Industry and a vibrant Industry produces high quality produce and creates employment. A potential future world food shortage has been widely documented and should this materialise, the Industry will be required to help ensure the Island becomes as self-sufficient as possible.</p> <p>The Union would therefore like to object to Policy H5: Housing in Rural Centres - the re-zoning of the following sites to provide Category "A" affordable housing on the above-mentioned grounds and the fact that we feel there are sufficient brown field sites which can be utilised prior to any green field sites being taken.</p>	The Minister acknowledges the importance of protecting the countryside and safeguarding agricultural land but has sought to identify those sites which have already been subject to some form of development, albeit for agricultural purposes, on the edge of the existing built-up area as having the most potential to contribute to the Island's housing needs..
IR(1) -54	A Le Bouler		Supporting	Green house site, so if redundant, suitable for development	Comment noted.
IR(1) -114	Carlo Riva	The Association of Jersey Architects	Supporting	No comment	Comment noted.
IR(1) -25	Carlo Riva	Riva Architects Ltd	Supporting	No comment.	Comment noted.
IR(1) -49	Chris Lamy		Supporting	Solely for social housing.	The housing needs assessment identifies a need for both social rented housing and affordable homes for purchase.
IR(1) -170	Deputy James Reed	States Member (St Ouen)	Supporting	<p>I fully support the development of field 785 which has already been identified in previous Island Plans as suitable for housing.</p> <p>This glasshouse site borders an existing development which offers a mix of social and first time buyer accommodation. It is worth pointing out that this site is more than a mile away from what many would term as essential parish amenities, and although people in the area can access public transport the service is limited. This means that anyone living in the area needs to be relatively mobile and own or have access to a car.</p> <p>This site would certainly not meet the needs of the more elderly in our community which is why I still support the use of Field 622 for this purpose.</p>	Comment noted.
IR(1) -45	J Le Main		Supporting	I would support this proposal given again, this is land which is already built upon.	Comment noted.
IR(1) -176	Martin Whitley	La Comité du Commune Rurale St.	Supporting	This would seem to be the conversion of a former greenhouse site for affordable housing and sits comfortably with the built up area.	Comment noted.

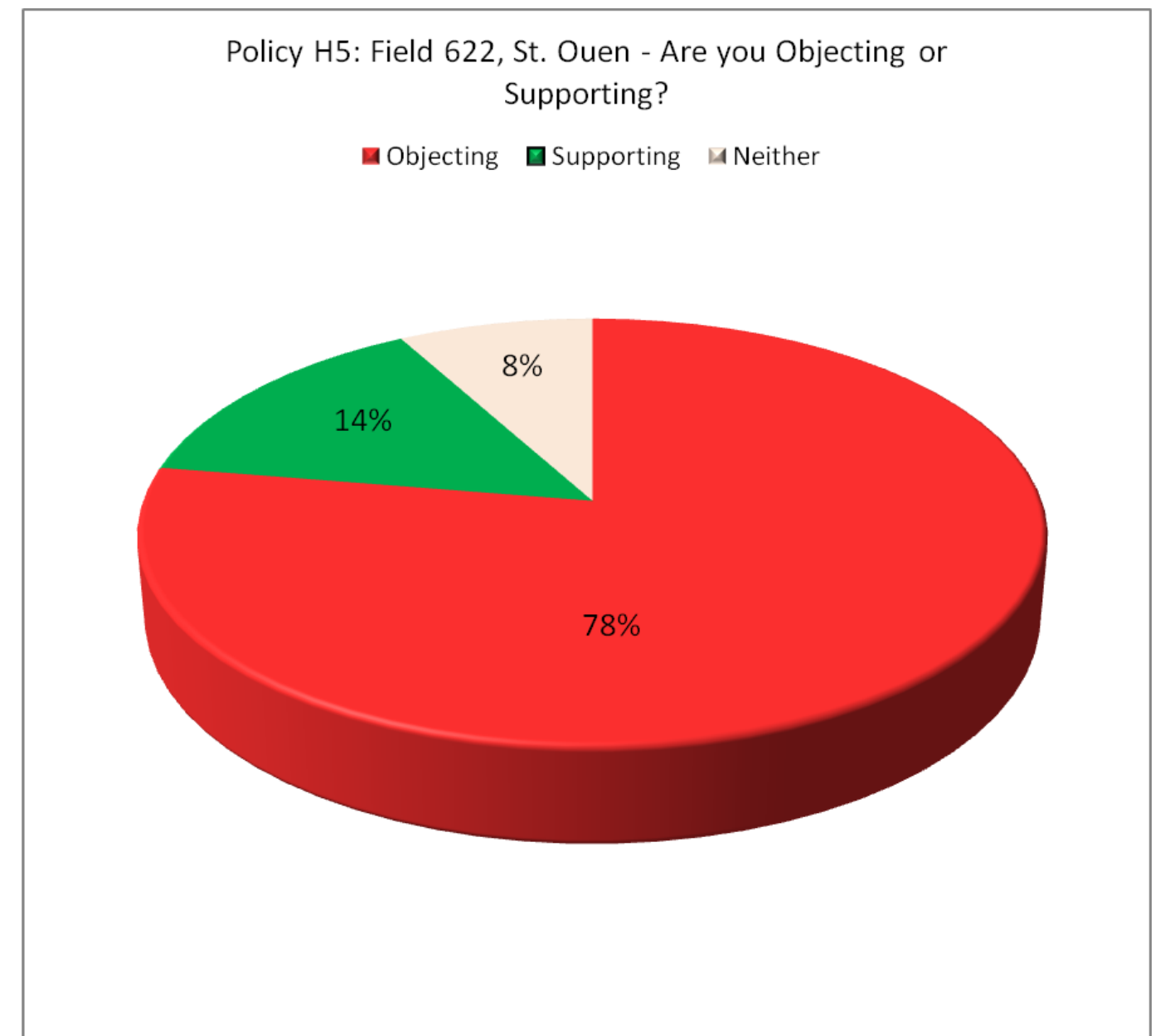
Ref	Name	Agent/ Organisation	Supporting/ Objecting	Reasons for answer	Minister's Response
		Jean			
IR(1) -142	Mr & Mrs Frazier	MSPlanning Ltd	Supporting	<p>There is little doubt that Field 785 is a suitable site for affordable housing both in terms of its overall suitability having regard to the spatial strategy, access, development constraints, landscape sensitivity and land use, and because it will be able to deliver a good number of affordable housing for the Parish and which can be delivered within a relatively short timeframe. Therefore, removal of this site from the island Plan, as which occurred during the States Debate, would be counterproductive for the island, because, as the Inspectors concluded in their remarks in 2011 "we have heard enough to convince us not just that the problem is not being solved but that in all likelihood it is becoming (and will continue to become) worse.</p> <p>Here we are in 2013 - the situation has become worse - and it would therefore be folly not to re-zone this site as the severity of the situation, particularly for young people, who are struggling to find acceptable accommodation, must not be under-estimated.</p>	Comment noted.
IR(1) -71	Mr & Mrs N & K Horman		Supporting	<p>This field, I presume, houses redundant green houses. Whilst I do not agree that it should be a foregone conclusion that it should be an obvious choice for development, it at least does not involve loss of an open green field.</p> <p>In the event absolutely necessary, it is certainly deemed a better choice than 622 for that reason.</p>	Comment noted.
IR(1) -47	Mr A Vardon		Supporting	A field which is already built upon.	Comment noted.
IR(1) -33	Mr Gary Le Brocq		Supporting	This land is already built on, and will more than provide St Ouen's contribution to Social rented housing quota for the Island (taking into account the established provision already in existence in addition)	Comment noted.
IR(1) -17	Mr John Shenton		Supporting	This site would appear to meet the basic criteria for development of affordable home.	Comment noted.
IR(1) -32	Mr Michael Stein	MSPlanning Ltd	Supporting	Makes sense to use redundant glasshouse site adjacent to Built Up Area	Comment noted.
IR(1) -26	Mrs Judy Martin	States Member (St. Helier No.1)	Supporting	they need young people to buy in this parish and this could help	Comment noted.
IR(1) -15	Mrs Rosemary Evans		Supporting	Reluctantly the development should never have been allowed	Comment noted.
IR(1) -121	Susie Pinel	States Member (St. Clement)	Supporting	Some of the rural areas should accept some more development to avoid continuous spread of urbanisation of St. Helier and surrounding Parishes.	Comment noted.

## Policy H5: Field 622, St. Ouen

The Minister for Planning and Environment is proposing to re-zone Field 622, St. Ouen for affordable housing under [policy H5](#).

### Questionnaire consultation results

	% Total	% Answer	Count
<b>Number of responses</b>	57%	-	125
<b>Objecting</b>	44%	78%	97
<b>Supporting</b>	8%	14%	18
<b>Neither</b>	5%	8%	10
<b>[No response]</b>	43%	-	94
<b>Total</b>	<b>100%</b>	<b>100%</b>	<b>219</b>



## Policy H5: Field 622, St. Ouen – comments

Ref	Name	Agent/ Organisation	Supporting/ Objecting	Reasons for answer	Minister's Response
IR(1) - 89	A Achler		Objecting	<p>This is a productive agricultural field which is used for potatoes and grazing year round. It has been designated green zone for many years and forms a good natural barrier between the village of St Ouen and the marshland area along Route du Marais.</p> <p>If part of this field is rezoned, it is obvious that the remaining surrounding fields will also eventually be developed and this will change the character of the village enormously.</p> <p>I therefore object to any development in this green zone field.</p>	<p>The Minister acknowledges the importance of protecting the countryside and safeguarding agricultural land and is only prepared to continue to consider the release of greenfield land on the edge of existing rural settlements where;</p> <ul style="list-style-type: none"> <li>the sponsors of the site's development are willing and can demonstrate that they are able to develop the site for the creation of homes that contribute towards the Island's housing needs, as evidenced by the Housing Gateway and;</li> <li>it is demonstrated that there are no other viable development opportunities to meet the Parish's aspirations within the existing Built-up Area boundary</li> </ul>
IR(1) -54	A Le Boulter		Objecting	Strongly object. Why take half a field? This is a much needed break in an already overly built up area.	See response to IR(1) - 89
IR(1) -212	A Manning		Objecting	Please no more building on green belt fields control population growth instead	See response to IR(1) - 89
IR(1) -63	Alison Davis		Objecting	<p>The reason I am objecting to this site being built on is the impact on the surrounding area.</p> <p>St Ouen is a unique parish with green fields within the village area and should be retained, particularly land of good agricultural quality, where crops need to be grown to feed the people of Jersey.</p> <p>The access from this green lane is very dangerous particularly on the Route de Vinchelez end, it is a total blind corner and until traffic calming is successful then this access should never be considered.</p> <p>I am sure there are other areas with existing buildings more appropriate to build on.</p> <p>Whilst the site assessment refers to their being no concerns with impact on the schools, my daughter has started at Les Landes in Reception and her class is I understand, the largest they have had for some years and the comments about Les Quennevais being capable concerns me given recent reports in the media. Thank you.</p>	<p>The Minister acknowledges the importance of protecting the countryside and safeguarding agricultural land and is only prepared to continue to consider the release of greenfield land on the edge of existing rural settlements where;</p> <ul style="list-style-type: none"> <li>the sponsors of the site's development are willing and can demonstrate that they are able to develop the site for the creation of homes that contribute towards the Island's housing needs, as evidenced by the Housing Gateway and;</li> <li>it is demonstrated that there are no other viable development opportunities to meet the Parish's aspirations within the existing Built-up Area boundary.</li> </ul> <p>The site assessment, at Appendix B of the proposed amendment, sets out the considerations relating to the potential impact of the development of these sites upon the local infrastructure. The current and future ability of local schools to accommodate anticipated demand for places is material and ESC has advised that there is capacity.</p>
IR(1) -46	Allyson Bisson		Objecting	<p>The Island Development Committee has already refused this field three times for Parishoners old people housing. I cannot see how the president can put this in the island plan for social housing bearing in mind his previous objections. It seems very contradictory.</p> <p>Also the area is only small and the access is onto the main road with little visibility.</p>	<p>The issues raised by the Planning Inspector at the public inquiry into the development of F.622 to provide homes for the elderly of the parish remain to be addressed.</p> <p>The Minister is, therefore, only prepared to continue to consider the release of greenfield land on the edge of existing rural settlements where;</p> <ul style="list-style-type: none"> <li>the sponsors of the site's development are willing and can demonstrate that they are able to develop the site for the creation of homes that contribute towards the Island's housing needs, as evidenced by the Housing Gateway and;</li> <li>it is demonstrated that there are no other viable development opportunities to meet the Parish's aspirations within the existing Built-up Area boundary</li> </ul>
IR(1) -38	Amanda Lees-Baker		Objecting	<p>I am against any development on green zone agricultural land. This field is actively farmed and of a good square size for modern farm machinery.</p> <p>I refer you to the refusal by Mr Bushby's on the recent Public Inquiry into developing this field.</p>	See response to IR(1) - 46
IR(1) -196	Ann Creedon		Objecting	<p>I believe that there should be no relaxation in rules governing the rezoning of green field sites and I wish to object to the proposal to rezone Field 622 for the purpose of social housing.</p> <p>This land has been farmed and grazed for many years and has indeed been so this year, 2013. The Royal Jersey Agricultural and Horticultural Society have expressed their concern over the loss of any farm land. We are going to need farm land to sustain the food needs of the population.</p>	See response to IR(1) - 89

Ref	Name	Agent/ Organisation	Supporting/ Objecting	Reasons for answer	Minister's Response
				The Jersey Heritage Trust has supported in writing the view that the site of Field 622 is of historical interest.	The site has not been recommended for any form of formal heritage designation by Jersey Heritage (ie a Listed building or place) as part of the recent historic environment review. On this basis any historic significance of the site remains to be substantiated.
IR(1) -95	Ann Richards		Objecting	This green field site has been rejected for planning three times already. It should remain a green field site and other brown site within the Parish should be developed.	See response to IR(1) - 46
IR(1) -44	C Bishop		Objecting	Why would you consider rezoning half a well used field of agricultural value which is green zone? I object to this as I believe better sites which are a better fit in terms of scale and location exist for such a purpose. This particular field is accessed via a small green lane onto busy traffic either end. Further, there is the issue of the marsh land being so close. Alternatives must be considered.	The Minister acknowledges the importance of protecting the countryside and safeguarding agricultural land and is only prepared to continue to consider the release of greenfield land on the edge of existing rural settlements where; <ul style="list-style-type: none"> <li>the sponsors of the site's development are willing and can demonstrate that they are able to develop the site for the creation of homes that contribute towards the Island's housing needs, as evidenced by the Housing Gateway and;</li> <li>it is demonstrated that there are no other viable development opportunities to meet the Parish's aspirations within the existing Built-up Area boundary.</li> </ul> The site assessment, at Appendix B of the proposed amendment, sets out the considerations relating to the potential impact of the development of these sites upon the local infrastructure.
IR(1) -9	C Breuilly		Objecting	I have already lodged my objections to the application by the Parish of St Ouen to build 'Homes for the Elderly' on Field 622 and this is now subject to the results of the recent Public Enquiry and I am surprised that the Minister can raise discussion of rezoning this field at least until the findings are made known. Many objections have been raised regarding the ecological impact on the area including the marsh on Hydrangea Avenue, the fact that this is currently an agricultural field in permanent use and currently in the Green Zone. This would mean an increase in the built up area of St Ouen's Village and loss of more agricultural land in a lovely country parish. Vehicles from any development would be coming out on to Rue de la Croute which is a narrow lane and this would increase the danger on this lane and the exit on to La Route du Vinchelez. The entrance to the development of this field would also be right opposite the entrance to a proposed housing development at Fosse au Bois Farm. This would mean an increase in traffic from both entrances on to what is currently a small country lane and right where the speed limit changes to 15mph and should therefore be a Green Lane. The rezoning of this field has been discussed many times and has been previously refused for the reasons stated above and I do not see that these reasons have changed and I hope that no undue pressure is being put on the Planning Department to meet the requirements of the Parish of St Ouen. On a personal note, both these entrances are right next to or opposite my property and I am concerned about any increase in traffic on a safety and noise level. It would affect the quality of my life living on a country lane in a lovely parish.	The issues raised by the Planning Inspector at the public inquiry into the development of F.622 to provide homes for the elderly of the parish remain to be addressed. The inspector's report was issued after the Minister has published his proposals to amend the Island Plan. The Minister is, therefore, only prepared to continue to consider the release of greenfield land on the edge of existing rural settlements where; <ul style="list-style-type: none"> <li>the sponsors of the site's development are willing and can demonstrate that they are able to develop the site for the creation of homes that contribute towards the Island's housing needs, as evidenced by the Housing Gateway and;</li> <li>it is demonstrated that there are no other viable development opportunities to meet the Parish's aspirations within the existing Built-up Area boundary.</li> </ul> The site assessment, at Appendix B of the proposed amendment, sets out the considerations relating to the potential impact of the development of these sites upon the local infrastructure.
IR(1) -114	Carlo Riva	The Association of Jersey Architects	Supporting	No comment	Noted
IR(1) -25	Carlo Riva	Riva Architects Ltd	Supporting	No comment.	Noted
IR(1) -49	Chris Lamy		Objecting	This is part a ten vergeé, highly productive agricultural field. It is the last truly green bastion before the Les Marais MARSHLANDS. Field 632 which was originally proposed some seven years ago for the elderly but with an unwilling seller was shelved. It is by far the better site in size and position than field 622 for the creation of twenty small bungalows for elderly	The Minister acknowledges the importance of protecting the countryside and safeguarding agricultural land and is only prepared to continue to consider the release of greenfield land on the edge of existing rural settlements where; <ul style="list-style-type: none"> <li>the sponsors of the site's development are willing and can demonstrate that they are able to develop the site for the creation of homes that contribute towards the Island's housing needs,</li> </ul>



Ref	Name	Agent/ Organisation	Supporting/ Objecting	Reasons for answer	Minister's Response
				people over the age of sixty five. The owner is now a willing seller and with the implementation of the already needed road traffic calming procedures this site is near to all the amenities and is ideally suited.	as evidenced by the Housing Gateway and; <ul style="list-style-type: none"> <li>where it is demonstrated that there are no other viable development opportunities to meet the Parish's aspirations within the existing Built-up Area boundary.</li> </ul> The same consideration would, therefore, apply in relation to any proposed development of F.632.
IR(1) -79	Claire Drummond		Objecting	Inappropriate use of green zone	See response to IR(1) - 89
IR(1) -53	Claire Le Brocq		Objecting	I object to this proposal on the same grounds given in relation to the Parish's previous applications for permission to develop the site for sheltered accommodation for the elderly (recently refused again after a public inquiry). To reiterate the basis of my objection: - 1. The east boundaries of fields 622 and 623 were declared in 1973/4 to be the end of the building line of the St Ouen's village development by the first ombudsman panel ever held. They declared the area a 'buffer zone' such that no development would be allowed westwards beyond this line because it would be classed as an extension into the countryside and that the area was to be classed as a very sensitive area due to the close proximity and importance of the marsh on Le Marais. This important buffer simply must remain.	Since 1974 three Island development plans have been approved by the States in 1987, 2002 and 2011 each of which supersedes that which went before it: the materiality of any decision made in 1974 is thus limited but nevertheless, forms part of the planning history of the site. The marsh at Le Marais has no formal status of designation relative to its ecological interest. The impact of any development on this site will, however, need to be carefully researched and evaluated and any adverse effect upon the area's ecological value avoided, mitigated or offset.
				2. Rue de la Croute is a very narrow green lane and access onto the main roads at either end is extremely hazardous. This also means access issues for emergency services. The impact of additional traffic on such a small narrow lane is also inappropriate. In case reference 2007/03, a field was not considered appropriate for rezoning on these grounds.	The use of the site for housing is supported by TTS: the site is near to a relatively frequent bus route and facilities and amenities are within reasonable walking and cycling distance. In the event that this site is rezoned for housing development, it is recognised that there would need to be an improvement to the junction of La Rue de la Croute and La Route de Vinchelez and possibly some localised widening of La Rue de la Croute.
				3. Drainage is an issue as the water table is high and this will result in flooding in the surrounding area affecting the Marsh and wildlife. .	The site assessment, at Appendix B of the proposed amendment, sets out the considerations relating to the potential impact of the development of this site upon the local infrastructure including that relating to the need to address drainage issues. The developer of the site, should it be rezoned, will be required to ensure that the local infrastructure is capable of dealing with existing issues and able to accommodate the requirement for increased foul and surface water drainage capacity. The impact of any development on this site will need to be carefully researched and evaluated and any adverse effect upon the area's ecological value avoided, mitigated or offset.
				4. The field is higher than the road. The development would require extensive excavations, proving costly and potentially problematic for surrounding properties in close proximity.	The developer of the site, should it be rezoned, will be required to produce a site waste management plan dealing with matters of excavation and the use of spoil.
				5. The Island Plan policy allows for the consideration of rezoning only when there are no other alternatives. This is not the case here. There have been many alternatives cited, including 584, 585 as well as close by redundant glass house sites. All offering easy access to the local amenities.	The Minister acknowledges the importance of protecting the countryside and safeguarding agricultural land and is only prepared to continue to consider the release of greenfield land on the edge of existing rural settlements where it is demonstrated that there are no other viable development opportunities to meet the Parish's aspirations within the existing Built-up Area boundary.
				6. We have had correspondence with Jersey Heritage which supports and endorses the argument for 'the site being of historical interest'.	The site has not been recommended for any form of formal heritage designation by Jersey Heritage (ie a Listed building or place) as part of the recent historic environment review. On this basis any historic significance of the site remains to be substantiated.
				7. As with Field 621 in Noirmont, the Field provides a 'valuable break in the existing built-up area'.	The comparison with Field 621, St Brelade is inappropriate and flawed: F.622 is not currently within the BUA. F.621 represented a 'gap' site within an existing BUA.

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				<p>8. The loss of agricultural land (which is leased and used all year round) and the potential impact of traffic (as supported by the decision not to progress the rezoning of sites referenced 2007/01 - and 2007/02).</p> <p>9. The proximity of the largest worked Agricultural Unit in the Parish.</p> <p>10. The Island Plan provisions of C13 &amp; 5 serve to safeguard agricultural land. This field is of a size and scale that makes it incredibly valuable and therefore worked agricultural land, a view shared by the Department of Agriculture and endorsed by their representation at the recent Public Inquiry.</p>	<p>The Minister acknowledges the importance of protecting the countryside and safeguarding agricultural land and is only prepared to continue to consider the release of greenfield land on the edge of existing rural settlements where;</p> <ul style="list-style-type: none"> <li>the sponsors of the site's development are willing and can demonstrate that they are able to develop the site for the creation of homes that contribute towards the Island's housing needs, as evidenced by the Housing Gateway and;</li> <li>where it is demonstrated that there are no other viable development opportunities to meet the Parish's aspirations within the existing Built-up Area boundary.</li> </ul>
				<p>11. One of only two reasons for which planning case reference P/2008/0540 was refused in August 2008 in the same location was on the grounds that it is 'an area of open and natural land within an environmentally sensitive location.....the creation of a new residential curtilage around the structure would result in the creeping domestication, and permanent loss, of an area of this open land which would be harmful to the natural character of the immediate vicinity. For this reason, it is considered that the application fails to satisfy the requirements of Policies G2 and C5 of the Jersey Island Plan'.</p> <p>In further consideration of the C5 policy in the context of La Rue De La Croute, the same case cited that the 'area has a high level of protection and there is a general presumption against new development' These statements clearly endorse the argument against development on this field.</p>	<p>In reviewing parts of the Island Plan to address the issue of the need for affordable homes, the Minister is able to consider the designation of land within the Island Plan afresh.</p> <p>In so doing, the Minister acknowledges the importance of protecting the countryside and safeguarding agricultural land and is only prepared to continue to consider the release of greenfield land on the edge of existing rural settlements where;</p> <ul style="list-style-type: none"> <li>the sponsors of the site's development are willing and can demonstrate that they are able to develop the site for the creation of homes that contribute towards the Island's housing needs, as evidenced by the Housing Gateway and;</li> <li>where it is demonstrated that there are no other viable development opportunities to meet the Parish's aspirations within the existing Built-up Area boundary.</li> </ul>
				<p>12. What will the future hold for the western element of Field 622 and indeed the Field numbered 623 in front of it? Both very well utilised large expanses of green zone of great agricultural and environmental value and significance.</p> <p>Our precious countryside simply cannot be carved up in such a manner.</p>	<p>The Island Plan period, which extends up to 2020, defines the parameters of development up until that time when the Plan and its content will be reviewed relative to the requirements of the Island at that time.</p>
				<p>I therefore cannot fail to believe that Field 622 is totally inappropriate for this development or indeed rezoning at all. Rezoning such a large, well used agricultural field which has such historical significance and environmental sensitivity simply cannot be justified.</p> <p>For all these reasons and supported by the avenues exhausted before getting to this point and given the planning department's rejection of other sites on common and far fewer grounds, one hopes the conclusion will be that Field 622 is simply not appropriate or viable for such a proposal or indeed rezoning for development of any kind</p>	<p>Comments noted.</p>
IR(1) -174	Connétable Michael Paddock	Parish of St. Ouen	Supporting	<p>The Parish is encouraged to note that the Planning Department has put forward the rezoning of Field 622 as part of their proposed interim review. The aims of the Parish of St. Ouen are similar to that of the department in that the rezoning of part of Field 622 to provide affordable homes is in the interest of not only the Parish, but also the island.</p> <p>You will be aware that this field was subject to a planning application for the construction of 19 over 55's rental units and subsequent public enquiry, however the outcome was negative. The reasons for refusal were primarily to do with lack of supporting documentation to justify the need, insufficient analysis of alternative sites and that the Parish did not undertake a village plan.</p> <p>The Parish still believe that there is an overwhelming demand for these units as there are a large number of people on the waiting list of the current parochial sheltered accommodation facilities.</p>	<p>The Minister acknowledges that the release of this site for residential development is sponsored by the Parish of St Ouen.</p> <p>The Minister for Planning and Environment is concerned to ensure, however, that residential development contributes towards the Island's need for affordable homes as proposed by his amendment to the 2011 Island Plan: this changes the definition of Cat A homes and access to them, which is based on people's income level (i.e. median income or below), and which is managed by the Strategic Housing Unit by assessment through the Housing Gateway.</p> <p>The Minister is only minded to continue to consider the release of valuable greenfield land for this purpose where he is convinced that:</p> <ul style="list-style-type: none"> <li>the sponsors of the site's development are willing and can demonstrate that they are able to develop the site for the creation of homes that contribute towards the Island's housing needs, as evidenced by the Housing Gateway and;</li> <li>it is demonstrated that there are no other viable development opportunities to meet the Parish's aspirations within the existing Built-up Area boundary.</li> </ul> <p>Policy H5 of the 2011 Island Plan already requires that evidence of need is demonstrated through the Housing Gateway. This does not preclude the occupation of any homes by parishioners or</p>

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					<p>those with connections to the parish, but only where they qualify through the Housing Gateway operated by the Strategic Housing Unit.</p> <p>Policy H5 also requires that any proposals to rezone land outwith the BUA are set within the context of a Village Plan.</p> <p>The Minister supports the strategy of seeking to ensure that elderly members of our communities can stay living in their own homes, supported by the networks with which they are familiar and which can address health needs, for as long as possible, and indeed this is an objective of the States Strategic Plan 2012 and a critical plank in the Island's new health strategy (Health and Social Services: a new way forward P.82/2012). It is relevant to note that the health strategy seeks to increase the number of service users being cared outside of a hospital or residential care setting and seeks to enhance community services to develop and deliver care to an individual's home.</p> <p>Since 2007 all new homes in Jersey have been built to local Lifetime Homes standards (amended in 2012), which includes improved provision for access to, use and adaptation of dwellings to better meet the requirements of an ageing society and which better enables people to remain in their own homes for as long as possible: this is required through Building Bye-Laws.</p> <p>In addition to this response to the needs of an ageing society in all new homes, there is a healthy level of provision of development schemes specifically for the over-55s (for sale and rent) on sites throughout the Island currently: at the beginning of the year there were outstanding commitments of some 350 homes specifically for the over-55s. These may provide additional features over and above the existing Jersey Lifetime Home standard (such as an additional bedroom), or just be a site-specific collection of new homes exclusively for people aged over-55.</p> <p>This does not include planned redevelopments and refurbishments of existing Housing Department sites, which are producing numbers of affordable social rented units aimed at older, less mobile members of the community. There will also be significant opportunities for private 'windfall' developments throughout the built-up areas of the Island where private developers can address identified housing demand.</p> <p>The Minister also supports the proper planning of communities and the development of community infrastructure necessary to sustain them in a manner which seeks to ensure that places are sustainably developed. The Minister remains to be convinced that the accretion of sites on the edge of the built-up area for the exclusive development of low density homes for the elderly represents the best way to plan for the ageing society in a way that ensures that elderly members of the community can best engage and receive the support that they need from the local communities of which they are part and the Island's health services.</p> <p>The Minister will, therefore, need to ensure that communities have sought to explore all alternatives in seeking to plan for the needs of the ageing society from within existing built-up areas, in a way that makes best use of land and buildings and which takes account of enhanced community health provision, before consideration is given to the release of greenfield land for this purpose.</p>
				<p>The Parish still believe that Field 622 is the most ideal site for sheltered accommodation in order to meet the demand, noting that the only alternative sites within the built up zone are very small or currently occupied by working farms.</p> <p>The Parish feel that if an alternative site was to be reviewed, it would also be within the green zone and, of the sites the Parish has reviewed, none have the benefits of Field 622.</p>	<p>The Minister is only minded to continue to consider the release of valuable greenfield land for this purpose where he is convinced that it is demonstrated that there are no other viable development opportunities to meet the Parish's aspirations within the existing Built-up Area boundary.</p>
				<p>The Parish would reconfirm that it has a desire to develop 19 no two bedroom, over 55's rental units, which are effectively Category A housing and therefore the Parish support the proposition of the Planning Department, however feel that creating further units on the site would be an overdevelopment and that for any other use other than Category A, over 55's housing would not be supported.</p>	<p>Policy GD3 of the 2011 Island Plan seeks to ensure that the highest reasonable density is achieved for all developments that is commensurate with good design.</p> <p>As stated at Appendix B, the site assessment have been undertaken thus far have been carried out to identify and consider the planning issues that are particular to each site and to provide a <i>potential indication</i> of housing yield: they are by no means definitive and, as stated, the actual number of homes on each site will be determined through the planning process having regard to all material planning considerations, such as GD1 and GD7. It is considered, however, that this site could accommodate between 19-32 dwellings.</p>

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					<p>The Minister for Planning and Environment is concerned to ensure that residential development contributes towards the Island's need for affordable homes as proposed by his amendment to the 2011 Island Plan: this changes the definition of Cat A homes and access to them, which is based on people's income level (i.e. median income or below), and which is managed by the Strategic Housing Unit by assessment through the Housing Gateway.</p> <p>This does not preclude the occupation of any homes by parishioners or those with connections to the parish, or by people over-55, but only where they qualify through the Housing Gateway operated by the Strategic Housing Unit.</p> <p>Should there not be sufficient demand from elderly St Ouennais, (as defined by assessment through the Housing Gateway) then any units to be provided on the site, either for affordable purchase and/or social rent, would be open to occupation/purchase by others from outwith the parish who may be younger than 55.</p>
				<p>The Parish is willing to work within the Housing Gateway and has received confirmation from the Housing Minister that the tenant selection can be filtered to meet the demand from Parishioners of St. Ouen.</p>	<p>The Minister for Planning and Environment is concerned to ensure that residential development contributes towards the Island's need for affordable homes as proposed by his amendment to the 2011 Island Plan: this changes the definition of Cat A homes and access to them, which is based on people's income level (i.e. median income or below), and which is managed by the Strategic Housing Unit by assessment through the Housing Gateway.</p> <p>This does not preclude the occupation of any homes by parishioners or those with connections to the parish, or by people over-55, but only where they qualify through the Housing Gateway operated by the Strategic Housing Unit.</p> <p>Should there not be sufficient demand from elderly St Ouennais, (as defined by assessment through the Housing Gateway) then any units to be provided on the site, either for affordable purchase and/or social rent, would be open to occupation/purchase by others from outwith the parish, with no connection to St. Ouen, who may be younger than 55.</p>
				<p>To summarise: The Parish is in support of the rezoning of Field 622, there is a justifiable need, a review of the existing sites has been undertaken and the Parish support the rezoning for Category A, over 55's housing for nineteen units only. We would be obliged if you could consider the above comments during the consultation process, however if you require any further clarification, please do not hesitate to contact us.</p>	<p>See responses above.</p>
IR(1) -94	Dave Richards		Objecting	<p>I object to development on a green zone site when alternative non green zone sites are available in the Parish of St. Ouen.</p>	<p>The Minister acknowledges the importance of protecting the countryside and safeguarding agricultural land and is only prepared to continue to consider the release of greenfield land on the edge of existing rural settlements where it is demonstrated that there are no other viable development opportunities to meet the Parish's aspirations within the existing Built-up Area boundary.</p>
IR(1) -164	Debra Le Geyt		Objecting	<p>I am writing to you with regard to planned review of the 2011 Island Plan - Field 622 - St Ouen re- zoning from Green Zone. I believe this is the wrong decision to make as I feel protection of Jersey's green zone is of high importance. I know that over past years proposals to re-zone have been rejected.</p> <p>There must be other areas that can be utilised for building more wisely.</p> <p>In regard to my above comments I would like to register my rejection to the above proposal.</p>	<p>The Minister acknowledges the importance of protecting the countryside and safeguarding agricultural land and is only prepared to continue to consider the release of greenfield land on the edge of existing rural settlements where it is demonstrated that there are no other viable development opportunities to meet the Parish's aspirations within the existing Built-up Area boundary.</p>



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IR(1) -170	Deputy James Reed	States Member (St.Ouen)	Supporting	<p>Extract from attached letter</p> <p>Plans submitted by the Parish to provide sheltered accommodation on 622, which I hasten to add are similar to those already owned by the Parish, were subject to a Public enquiry lead by an independent public inspector who came to the conclusion that field 622 should not be rezoned for sheltered or over 55 housing as there were too many questions that remained unanswered to allow Island Plan policies to be breached. I can therefore understand why some may wish to see the field removed from the list of sites to be included in the Island Plan review, however questions still remain which need to be answered before the Minister or indeed the Parish is able to reach any final decision on the matter.</p> <p>In particular, I would expect the Minister to take account of all matters raised by the Inspector in his report, especially those highlighted in the summary of conclusions, as I believe there are lessons to be learnt, which may not only help the Parish but also improve the proposed Island Plan review currently underway.</p>	<p>The issues raised by the Planning Inspector at the public inquiry into the development of F.622 to provide homes for the elderly of the parish remain to be addressed. The inspector's report was issued after the Minister has published his proposals to amend the Island Plan. It will remain a material consideration as to how the Minister will take his proposals forward.</p> <p>The Minister is, therefore, only prepared to continue to consider the release of greenfield land on the edge of existing rural settlements where;</p> <ul style="list-style-type: none"> <li>the sponsors of the site's development are willing and can demonstrate that they are able to develop the site for the creation of homes that contribute towards the Island's housing needs, as evidenced by the Housing Gateway and;</li> <li>it is demonstrated that there are no other viable development opportunities to meet the Parish's aspirations within the existing Built-up Area boundary.</li> </ul>
				<p>The first point worth noting is that the inspector believed that main arguments against the proposed development could have been overcome if there had been far greater and better co-operation between the Parish of St Ouen, the department of the Environment, Planning department, the Housing department and local objectors.</p> <p>The inspector also makes the comment that before the planning application was submitted a rigorous examination of alternative sites, supported by a rigorous examination of the need and requirement for sheltered housing in St Ouen should have been undertaken, as both are required by the IP policy.</p>	<p>The Minister is only prepared to continue to consider the release of greenfield land on the edge of existing rural settlements where;</p> <ul style="list-style-type: none"> <li>the sponsors of the site's development are willing and can demonstrate that they are able to develop the site for the creation of homes that contribute towards the Island's housing needs, as evidenced by the Housing Gateway and;</li> <li>it is demonstrated that there are no other viable development opportunities to meet the Parish's aspirations within the existing Built-up Area boundary.</li> </ul>
				<p>He then goes on to say that the missing information can be resolved by answering a number of key questions including;</p> <ul style="list-style-type: none"> <li>What is the up-to-date accurate sheltered housing requirement for St Ouen, other nearby Parishes and the Island as a whole. Whether the figures can be confirmed by the Housing department and Gateway</li> <li>What is the most appropriate way of meeting the sheltered housing requirement especially in rural parishes</li> </ul>	<p>The Minister's proposed amendment which seeks to provide additional housing supply is based on the latest evidence of housing supply, demand and affordability provided by the 2012 Housing Needs Survey (undertaken as part of JASS); the Housing Affordability Report and the latest Residential Land Availability report: this indicates that there is considered to currently be a reasonable level of supply of sheltered housing throughout the Island, albeit that there is no new provision specifically within the parish of St Ouen.</p> <p>The Minister for Planning and Environment is concerned to ensure that residential development contributes towards the Island's pressing need for affordable homes as proposed by his amendment to the 2011 Island Plan: this changes the definition of Cat A homes and access to them, which is based on people's income level (i.e. median income or below), and which is managed by the Strategic Housing Unit by assessment through the Housing Gateway.</p> <p>This does not preclude the occupation of any homes by parishioners or those with connections to the parish, or by people over-55, but only where they qualify through the Housing Gateway operated by the Strategic Housing Unit.</p> <p>The Minister supports the strategy of seeking to ensure that elderly members of our communities can stay living in their own homes, supported by the networks with which they are familiar and which can address health needs, for as long as possible, and indeed this is an objective of the States Strategic Plan 2012 and a critical plank in the Island's new health strategy (Health and Social Services: a new way forward P.82/2012). It is relevant to note that the health strategy seeks to increase the number of service users being cared outside of a hospital or residential care setting and seeks to enhance community services to develop and deliver care to an individual's home.</p> <p>Since 2007 all new homes in Jersey have been built to local Lifetime Homes standards (amended in 2012), which includes improved provision for access to, use and adaptation of dwellings to better meet the requirements of an ageing society and which better enables people to remain in</p>



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					<p>their own homes for as long as possible: this is required through Building Bye-Laws.</p> <p>In addition to this response to the needs of an ageing society in all new homes, there is a healthy level of provision of development schemes specifically for the over-55s (for sale and rent) on sites throughout the Island currently: at the beginning of the year there were outstanding commitments of some 350 homes specifically for the over-55s. These may provide additional features over and above the existing Jersey Lifetime Home standard (such as an additional bedroom), or just be a site-specific collection of new homes exclusively for people aged over-55.</p> <p>This does not include planned redevelopments and refurbishments of existing Housing Department sites, which are producing numbers of affordable social rented units aimed at older, less mobile members of the community. There will also be significant opportunities for private 'windfall' developments throughout the built-up areas of the Island where private developers can address identified housing demand.</p> <p>The Minister also supports the proper planning of communities and the development of community infrastructure necessary to sustain them in a manner which seeks to ensure that places are sustainably developed. The Minister remains to be convinced that the accretion of sites on the edge of the built-up area for the exclusive development of low density homes for the elderly represents the best way to plan for the ageing society in a way that ensures that elderly members of the community can best engage and receive the support that they need from the local communities of which they are part and the Island's health services.</p> <p>The Minister will, therefore, need to ensure that communities have sought to explore all alternatives in seeking to plan for the needs of the ageing society from within existing built-up areas, in a way that makes best use of land and buildings and which takes account of enhanced community health provision, before consideration is given to the release of greenfield land for this purpose.</p>
				<p>And finally, if there is to be growth and new development in and around St Ouen, where should it be located and when should it take place.</p> <p>Obviously, the Parish has to take some responsibility for not providing detailed answers to these questions however it is interesting to note that in section 180 of his report the inspector makes the point that these questions shouldn't be left to a single Parish to answer and without the close co-operation and engagement of the relevant departments of the States of Jersey. He further emphasises this point in the Inspector's note, by commenting that "I am surprised that these questions were not answered during the preparation and examination of the Island Plan. The pursuit of these questions is the normal way to manage the orderly and sensible development of an Island such as Jersey."</p> <p>The is perhaps the most challenging comment, as the Inspector is not only commenting on the Parish application but offering his view on what he believes to be essential information necessary to support further development across the Island.</p>	<p>The questions posed by the inspector are dealt with by the Spatial Strategy of the Plan which seeks to ensure that most of the Island's development needs are to be met from within the existing built-up area boundaries, which is why they are drawn so tightly around St Ouen's Village.</p>
				<p>In summary, I fervently hope that as the Minister reviews the current Island Plan he will take on board the comments of the Independent inspector and not only help the Parish answer the questions posed but also support the Parish in their desire to provide for those in our community.</p> <p>Until further work is undertaken and alternative sites investigated, I am of the belief that field 622 should be rezoned to allow the Parish to provide affordable rental units which can be occupied for the more elderly of our community. Let us not forget that unlike many urban parishes, St Ouen does not have many brown field sites which can be used or are suitable for housing. This invariably means that green fields will need to be rezoned in order to meet the needs of the community both now and in the future.</p> <p>Although I do not advocate building in green fields and wish to see the countryside protected I accept that there will be times when land will need to be rezoned for housing. The Parish has a duty to continue to provide housing for those in need especially the more elderly of our community and I therefore</p>	<p>The Minister acknowledges the importance of protecting the countryside and safeguarding agricultural land and is only prepared to continue to consider the release of greenfield land on the edge of existing rural settlements where;</p> <ul style="list-style-type: none"> <li>the sponsors of the site's development are willing and can demonstrate that they are able to develop the site for the creation of homes that contribute towards the Island's housing needs, as evidenced by the Housing Gateway and;</li> <li>it is demonstrated that there are no other viable development opportunities to meet the Parish's aspirations within the existing Built-up Area boundary.</li> </ul> <p>The Minister supports the strategy of seeking to ensure that elderly members of our communities can stay living in their own homes, supported by the networks with which they are familiar and which can address health needs, for as long as possible, and indeed this is an objective of the States Strategic Plan 2012 and a critical plank in the Island's new health strategy (Health and Social Services: a new way forward P.82/2012). It is relevant to note that the health strategy seeks to increase the number of service users being cared outside of a hospital or residential care setting and seeks to enhance community services to develop and deliver care to an individual's</p>

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				would like to register my support for the inclusion of field 622 in the revision of the Island Plan.	<p>home.</p> <p>Since 2007 all new homes in Jersey have been built to local Lifetime Homes standards (amended in 2012), which includes improved provision for access to, use and adaptation of dwellings to better meet the requirements of an ageing society and which better enables people to remain in their own homes for as long as possible: this is required through Building Bye-Laws.</p> <p>In addition to this response to the needs of an ageing society in all new homes, there is a healthy level of provision of development schemes specifically for the over-55s (for sale and rent) on sites throughout the Island currently: at the beginning of the year there were outstanding commitments of some 350 homes specifically for the over-55s. These may provide additional features over and above the existing Jersey Lifetime Home standard (such as an additional bedroom), or just be a site-specific collection of new homes exclusively for people aged over-55.</p> <p>This does not include planned redevelopments and refurbishments of existing Housing Department sites, which are producing numbers of affordable social rented units aimed at older, less mobile members of the community. There will also be significant opportunities for private 'windfall' developments throughout the built-up areas of the Island where private developers can address identified housing demand.</p> <p>The Minister also supports the proper planning of communities and the development of community infrastructure necessary to sustain them in a manner which seeks to ensure that places are sustainably developed. The Minister remains to be convinced that the accretion of sites on the edge of the built-up area for the exclusive development of low density homes for the elderly represents the best way to plan for the ageing society in a way that ensures that elderly members of the community can best engage and receive the support that they need from the local communities of which they are part and the Island's health services.</p> <p>The Minister will, therefore, need to ensure that communities have sought to explore all alternatives in seeking to plan for the needs of the ageing society from within existing built-up areas, in a way that makes best use of land and buildings and which takes account of enhanced community health provision, before consideration is given to the release of greenfield land for this purpose.</p>
IR(1) -177	Deputy John Le Fondré		Neither	<p>Generally I am not supportive of greenfield development.</p> <p>If this is a site which is strongly supported by the Parish (including by Parish Assembly), Constable and Deputy. I may be persuaded, but at present I would not be supportive. I would note that this field (in particular) does seem to be attracting opposition from residents.</p>	See response to IR(1) - 89
IR(1) -194	Dolan Laurence		Objecting	<p>I am writing in regards to your planned review of the 2011 Island Plan, specifically the inclusion of Field 622 - St. Ouen for re-zoning from a "Green Zone" I very much wish to register my objection to this proposal</p> <p>I, along with many Islanders, feel that the protection of Jersey's Green Zones is extremely important. It is my understanding that over the last couple of years, proposals to re-zone &amp; develop Field 622 have been rejected. I also understand that the previous Minister rejected the re-zoning of Field 622 and the Public Inquiry in 2013 also advised against re-zoning. How much money has been spent on this matter?</p> <p>There are "Non Green Zone" areas that have been unused for a number of years. Could these not be used for development?</p> <p>Though to be honest, as a proud Islander, I feel that Jersey is rapidly reaching its peak in terms of development. Surely there are many properties in need to renovation that could be used for social housing.</p> <p>We truly need to keep Jersey's countryside free from further development before we become a concrete jungle - if that happens then I for one would leave this beautiful Island I am proud to call home!</p>	See response to IR(1) - 89

Ref	Name	Agent/ Organisation	Supporting/ Objecting	Reasons for answer	Minister's Response
IR(1) -195	Douglas Creedon		Objecting	<p>I wish to object to plans to re-zone Green Zones sites with particular reference to Field 622 for the following reasons.</p> <p>On a general note I do not believe that Green Zones should be sacrificed for any reason. In 1973/4 the very first Ombudsman Panel ever held in relation to planning and development declared that, "no development westward of the eastern boundaries of Fields 622 and 623 would be allowed as it was an incursion into the countryside and that the area was to be classed as very sensitive environmentally due to the proximity and importance of the Marsh." In short, a single "buffer zone" was to be created.</p> <p>The marsh has not moved so the buffer zone must remain. Any domestic development on this field will have a dramatic effect on drainage into the marsh and could result in flooding.</p>	<p>Since 1974 three Island development plans have been approved by the States in 1987, 2002 and 2011 each of which supersedes that which went before it: the materiality of any decision made in 1974 is thus limited but nevertheless, forms part of the planning history of the site.</p> <p>The impact of any development on this site will need to be carefully researched and evaluated and any adverse effect upon the area's ecological value avoided, mitigated or offset.</p>
				<p>If the eastern half of 622 is developed it renders the western half unsuitable for farming. The Minister has recently refused building permission on this site for elderly housing. It, therefore, seems extraordinary that he is now suggesting that the same land should be used for social housing.</p>	<p>See response to IR(1) - 89</p>
IR(1) -217	E Le Brocq		Objecting	<p>This is a green field site. Green field means green field which means no development.</p>	<p>See response to IR(1) - 89</p>
				<p>We have Dandara 242 at Westmount, Rouge Bouillon Police and Ambulance site; Girls College site; Gas Works site; How much more, deal with the problems of allowing more and more people in.</p>	<p>The decision to provide more affordable and social housing is a key action of the States Strategic Plan 2012.</p> <p>The latest evidence on affordability indicates that open market housing, which includes some of the sites referred to, is beyond the reach of many people in Jersey (see: <a href="http://www.gov.je/Government/JerseyWorld/StatisticsUnit/Prices/Pages/HousingAffordability.aspx">http://www.gov.je/Government/JerseyWorld/StatisticsUnit/Prices/Pages/HousingAffordability.aspx</a>)</p>
IR(1) -40	E Morin		Objecting	<p>This field has already been rejected for housing, I feel that there are more suitable sites in St Ouen. The fields next to the hospice shop have better access to a main road with high visibility.</p>	<p>See response to IR(1) - 89</p>
				<p>Increasing the number of cars passing through a narrow green lane and with restricted visibility to the main road doesn't make sense.</p>	<p>In the event that this site is rezoned for housing development, it is recognised that there would need to be an improvement to the junction of La Rue de la Croute and La Route de Vinchelez and possibly some localised widening of La Rue de la Croute.</p>
				<p>I believe this field was to be a buffer for the marsh land and should not be developed from an environmental perspective.</p>	<p>The impact of any development on this site will need to be carefully researched and evaluated and any adverse effect upon the area's ecological value avoided, mitigated or offset.</p>
IR(1) -57	H Surcouf		Objecting	<p>I object strongly to more green fields been given up for predominately social housing.. Residents of St Ouen have paid a premium to live in a rural parish and slowly but surely their rural landscape is being eaten away by ever increasing development.</p>	<p>The Minister is only prepared to continue to consider the release of greenfield land on the edge of existing rural settlements where;</p> <ul style="list-style-type: none"> <li>the sponsors of the site's development are willing and can demonstrate that they are able to develop the site for the creation of homes that contribute towards the Island's housing needs, as evidenced by the Housing Gateway and;</li> <li>it is demonstrated that there are no other viable development opportunities to meet the Parish's aspirations within the existing Built-up Area boundary.</li> </ul> <p>The impact of the release of land for development upon the landscape character of the area, which is an asset enjoyed by all islanders, is material to the Minister's consideration.</p>
				<p>In this instance I understand this proposed site to be in a marsh area, have we not learnt lessons from La Providence?</p>	<p>The Minister considers that the development of the La Providence demonstrates that new housing can be successfully provided adjacent to wet meadows and that, as a direct result of the development, the local infrastructure can be enhanced to address existing drainage issues and to cope with additional demand, and that the quality of and access to wildlife areas can be enhanced through planning gain.</p>
				<p>I also understand that this site was not deemed suitable for development when put forward for a 'retirement village' so this new proposal totally contradicts that decision.</p>	<p>The issues raised by the Planning Inspector at the public inquiry into the development of F.622 to provide homes for the elderly of the parish remain to be addressed. The inspector's report was issued after the Minister has published his proposals to amend the Island Plan. It will remain a</p>

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					material consideration as to how the Minister will take his proposals forward.
IR(1) -45	J Le Main		Objecting	<p>I am not in agreement with this proposal given it is a large field in the green zone which has agricultural value and environmental sensitivity given its proximity to the marsh land on neighbouring hydrangea avenue.</p> <p>Unlike the preceding sites proposed, it has not been built on and provides a welcome break in an already incredibly densely populated area.</p> <p>The access is a narrow green lane which leads on to two very busy roads. It also does not make sense to propose half a field? I am confident more suitable sites exist.</p>	See response to IR(1) - 89
IR(1) -78	J Rebours		Objecting	<p>I strongly object to this proposition.</p> <p>To take a beautiful green field in this location does not make any sense at all. Like many of the comments that have come before mine, there are ample alternatives and I quite agree that this proposal should instead be for the rezoning of a field which is not used for agriculture and certainly not on this scale. The area is too built up already and I honestly cannot believe that it makes any sense at all to suggest half a field.</p>	See response to IR(1) - 89
IR(1) -167	Jennifer Fahy		Objecting	<p>I am writing in connection with your planned review of the 2011 Island Plan and the inclusion of Field 622 in St. Ouen for re-zoning from "Green Zone".</p> <p>I wish to register with you my strongest objection to this proposal on a number of grounds, namely:- 1) Over the last three years, proposals to re-zone and develop in Field 622 have been turned down or rejected on a number of occasions.</p>	In reviewing parts of the Island Plan to address the issue of the need for affordable homes, the Minister is able to consider the designation of land within the Island Plan afresh.
				<p>2) The previous Minister rejected the re-zoning of Field 622 and a subsequent Examination in Public in 2011 and Public Inquiry in 2013 likewise advised against re-zoning. How many more times does this have to go before a public forum? How much more public funding is going to be thrown at this issue?</p>	<p>The issues raised by the Planning Inspector at the public inquiry into the development of F.622 to provide homes for the elderly of the parish remain to be addressed. The inspector's report was issued after the Minister had published his proposals to amend the Island Plan. It will remain a material consideration as to how the Minister will take his proposals forward.</p> <p>Previous decisions will also be material to further consideration of the matter although the Minister is not bound by them.</p>
				<p>3) This is a productive agricultural field, designated as "Green Zone" and any alteration to this designation will not only violate the Green Zone status but loose the production of a large field. The Island must preserve it's land bank and agricultural production.</p> <p>4) There are several alternative sites available in St. Ouen, including brown field sites, derelict glass house sites and others. To develop in a Green Zone site whilst these other "Non Green Zone" sites have not been used, would be idiotic and raise questions as to the motive.</p>	<p>The Minister acknowledges the importance of protecting the countryside and safeguarding agricultural land and is only prepared to continue to consider the release of greenfield land on the edge of existing rural settlements where;</p> <ul style="list-style-type: none"> <li>the sponsors of the site's development are willing and can demonstrate that they are able to develop the site for the creation of homes that contribute towards the Island's housing needs, as evidenced by the Housing Gateway and;</li> <li>it is demonstrated that there are no other viable development opportunities to meet the Parish's aspirations within the existing Built-up Area boundary.</li> </ul>
				<p>5) The residents neighbouring Field 622 have tolerated nearly four years of uncertainty and the threat to their local environment. To continue this process would be unacceptable and unfair.</p>	The Island Plan period, which extends up to 2020, defines the parameters of development up until that time when the Plan and its content will be reviewed relative to the requirements of the Island at that time.
				<p>6) The need for social housing or sheltered housing in St. Ouen has not been proven. The last Public Inquiry on Field 622 called into question the information submitted to that inquiry.</p>	The Minister acknowledges the importance of protecting the countryside and safeguarding agricultural land and is only prepared to continue to consider the release of greenfield land on the edge of existing rural settlements where the sponsors of the site's development are willing and can demonstrate that they are able to develop the site for the creation of homes that contribute towards the Island's housing needs, as evidenced by the Housing Gateway.



Ref	Name	Agent/ Organisation	Supporting/ Objecting	Reasons for answer	Minister's Response
				7) You have already rejected the Parish of St. Ouen's application to build in Field 622 so why are you now proposing to develop the same field? This makes no sense.	The Minister acknowledges that the release of this site for residential development is sponsored by the Parish of St Ouen. The Minister for Planning and Environment is concerned to ensure, however, that residential development contributes towards the Island's need for affordable homes as proposed by his amendment to the 2011 Island Plan: this changes the definition of Cat A homes and access to them, which is based on people's income level (i.e. median income or below), and which is managed by the Strategic Housing Unit by assessment through the Housing Gateway.
				8) The protection of our "Green Zones" is extremely important. Why designate areas as "Green Zone" if they are continually re-designated? Keep our Green Zones and use lesser category sites. I repeat there are alternative sites in St. Ouen.	The Minister is only prepared to continue to consider the release of greenfield land on the edge of existing rural settlements where it is demonstrated that there are no other viable development opportunities to meet the Parish's aspirations within the existing Built-up Area boundary.
IR(1) -62	John Davis		Objecting	The purpose of field 785 and 622 in the rural parishes, sling with St Martin relates to the need to ensure the rural parishes don't have an ageing population. Les Landes school has had one of its largest Reception year intakes. Accordingly young families with children are well established in St Ouen. To build more sites will add additional pressure and therefore need for an additional school in the parish.	The current and future ability of local schools to accommodate anticipated demand for places is material and ESC has advised that there is capacity.
IR(1) -5	L & M Howard		Objecting	I am surprised that this should be proposed at all, given the recent Public Inquiry has yet to report. In any event, it is apparently Green Zone and should remain as such for at least the life of the 2011 Plan. Perhaps Planning might consider the needs of the residents in the area for a change?	The issues raised by the Planning Inspector at the public inquiry into the development of F.622 to provide homes for the elderly of the parish remain to be addressed. The inspector's report was issued after the Minister had published his proposals to amend the Island Plan. It will remain a material consideration as to how the Minister will take his proposals forward.
				Additionally, why re-zone 1/2 a field? The whole thing should be used for badly needed food production. It was to be hoped that we had moved on from such ad-hoc re-zonings but it seems lessons have yet to be learned.	See response to IR(1) - 89
IR(1) -41	Lauren Bishop		Objecting	I strongly object to the proposed re-zoning of this green zone when there are many other alternative and indeed more suitable areas for this. We must protect our environment - the area is green zone for a reason.	See response to IR(1) - 89
IR(1) -176	Martin Whitley	La Comité du Commune Rurale St. Jean	Objecting	This is clear erosion of the green zone.	See response to IR(1) - 89
IR(1) -93	Matthew Sutton		Objecting	There appears to be parish politics at play here. This is GREEN ZONE and should not nee developed whilst other more suitable sites are available.	See response to IR(1) - 89
IR(1) -123	Mike Jackson		Objecting	It's a green field	See response to IR(1) - 89
IR(1) -75	Mr & Mrs C & A Vibert		Objecting	We fundamentally disagree with development of a substantial and viable green field when totally unnecessary.	See response to IR(1) - 89
IR(1) -71	Mr & Mrs N & K Horman		Objecting	In contrast to most of the other sites proposed, which are mostly green house sites, this is 'part' of a large green field. It stands out like a sore thumb to the other sites proposed. Therefore how this has come to be considered worthy of being proposed for rezoning for development is inconceivable.	The Minister acknowledges that the release of this site for residential development is sponsored by the Parish of St Ouen. The Minister for Planning and Environment is concerned to ensure, however, that residential development contributes towards the Island's need for affordable homes as proposed by his amendment to the 2011 Island Plan: this changes the definition of Cat A homes and access to them, which is based on people's income level (i.e. median income or below), and which is managed by the Strategic Housing Unit by assessment through the Housing Gateway. The Minister is only minded to continue to consider the release of valuable greenfield land for this purpose where he is convinced that: <ul style="list-style-type: none"> <li>the sponsors of the site's development are willing and can demonstrate that they are able to develop the site for the creation of homes that contribute towards the Island's housing needs, as evidenced by the Housing Gateway and;</li> <li>it is demonstrated that there are no other viable development opportunities to meet the</li> </ul>



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					Parish's aspirations within the existing Built-up Area boundary.
				This area in St Ouens is already far too 'built on' and a field of this nature is a pleasant and necessary break, not to mention the potential impact on the neighbouring marsh land.	The impact of any development on this site will need to be carefully researched and evaluated and any adverse effect upon the area's ecological value avoided, mitigated or offset.
				To see the volume of pedestrian and vehicle flow that would ensue from a small green lane onto two such busy roads would also be a great concern. I do consider there to be far better alternative locations for a development of this scale and kind, surely one which at least does not involve chopping an agricultural field in half!	See above
IR(1) -47	Mr A Vardon		Objecting	I am not in agreement with this particular proposal. This has, I believe, been rejected on more than one occasion for a low lying bungalow development for the elderly and for good reason so I am surprised to see it featured here. We must preserve our green zone to the extent possible and this large open field is used for agricultural purposes all year. Surely there are more suitable alternative sites?	See response to IR(1) - 89
IR(1) -96	Mr Andrew Le Brun		Objecting	The consultation paper does not explain: Why it is proposed to rezone Field 622 so soon after adoption of the 2011 Island Plan (which designated the whole of the field as Green Zone).	<p>Since the approval of the 2011 Island Plan the economic downturn has continued to affect the housing market and people's ability to meet their housing needs, with consequential implications for the local development industry. New data about housing needs and affordability has lead to a review of the demand for homes and the type of affordable homes that the Island Plan can enable.</p> <p>An important element of the proposed revision to the Plan is a new definition of Category A housing which seeks to ensure that the Island Plan better meets the housing needs of those people who have most difficulty gaining access to homes. This is coupled with a new mechanism to ensure that homes provided are better targeted and accessible to those most in need.</p> <p>The proposed revision to the Plan also sets out a new mechanism for the delivery of affordable homes. It is proposed that the 2011 Island Plan Policy H3, which requires a proportion of private housing development to be provided as affordable housing, is set aside and replaced with one that seeks to deliver truly affordable homes on States owned land and on private land that is specifically zoned for this purpose.</p> <p>The review of the 2011 Island Plan has identified possible sites for affordable housing that meet the criteria of the spatial strategy and replaces the alternative village plan process. The initial site assessment, public consultation and examination will inform the Minister's decision on whether to include the site in a rezoning proposition to the States.</p>
				<p>Why the Minister wishes to rezone land that is not the subject of a Village Plan (and which, by implication, has not been identified by the municipality as supporting and enhancing the critical mass of, and diversity in, the local parish population).</p> <p>Why the presumption against the loss of good (and productive) agricultural land has been set aside.</p>	<p>The Minister acknowledges that the release of this site for residential development is sponsored by the Parish of St Ouen.</p> <p>The Minister is only minded to continue to consider the release of valuable greenfield land for this purpose where he is convinced that:</p> <ul style="list-style-type: none"> <li>the sponsors of the site's development are willing and can demonstrate that they are able to develop the site for the creation of homes that contribute towards the Island's housing needs, as evidenced by the Housing Gateway and;</li> <li>it is demonstrated that there are no other viable development opportunities to meet the Parish's aspirations within the existing Built-up Area boundary.</li> </ul>
IR(1) -113	Mr Bernard Cooper		Objecting	I would like to object to the rezoning of Field No. 622 in St Ouen for affordable housing in the Green Zone... the field is in constant use for agricultural needs and is used for the production of Jersey Royals and Winter grazing.	<p>The Minister acknowledges that the release of this site for residential development is sponsored by the Parish of St Ouen.</p> <p>The Minister is only minded to continue to consider the release of valuable greenfield land for this purpose where he is convinced that:</p> <ul style="list-style-type: none"> <li>the sponsors of the site's development are willing and can demonstrate that they are able to</li> </ul>

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					<p>develop the site for the creation of homes that contribute towards the Island's housing needs, as evidenced by the Housing Gateway and;</p> <ul style="list-style-type: none"> <li>it is demonstrated that there are no other viable development opportunities to meet the Parish's aspirations within the existing Built-up Area boundary.</li> </ul>
				Rue de la Croute is a narrow Green Lane with poor access and would be even more hazardous if a development was approved, there is no opportunity to improve safety with road widening or pavements and would have restrictive access for emergency services.	In the event that this site is rezoned for housing development, it is recognised that there would need to be an improvement to the junction of La Rue de la Croute and La Route de Vinchelez and possibly some localised widening of La Rue de la Croute.
				<p>The impact on the local environment due to building in the Green Zone would mean that we would lose an important "Wildlife Corridor" with the level of biodiversity that allows wildlife to move along the hedgerows, walls and banks, furthermore development would alter the high water table, which in turn would affect drainage to the marsh on Rue Marais and surroundings.</p> <p>The use of this land in the Green Zone would result in loss of agricultural land, landscape character and also have a detrimental effect on the environmental features in the area and requires the highest level of protection from development.</p>	The impact of any development on this site will need to be carefully researched and evaluated and any adverse effect upon the area's ecological value avoided, mitigated or offset.
IR(1) -8	Mr Bob Henkhuzens		Objecting	<p>Applications for a change of use as regards greenhouses that are no longer used, are likely to have some reasonable cause for review on a case by case basis. However this proposal does not fall in that category whatsoever. This proposal is quite simply to change a green agricultural field into a housing site. The site should remain for agricultural purposes only.</p> <p>As regards this particular site, it is even more important to recognise that every piece of rural space that is lost will be lost forever. Furthermore for each piece that is lost, there will undoubtedly be a subsequent application to change the use of yet another piece of land next to one lost. Clearly the next proposal will be to build on the field immediately to the south and the one immediately to the west.</p>	<p>The Minister acknowledges that the release of this site for residential development is sponsored by the Parish of St Ouen.</p> <p>The Minister is only minded to continue to consider the release of valuable greenfield land for this purpose where he is convinced that:</p> <ul style="list-style-type: none"> <li>the sponsors of the site's development are willing and can demonstrate that they are able to develop the site for the creation of homes that contribute towards the Island's housing needs, as evidenced by the Housing Gateway and;</li> <li>it is demonstrated that there are no other viable development opportunities to meet the Parish's aspirations within the existing Built-up Area boundary.</li> </ul>
				The proposal has gathered some political impetus only because it is concerned with the construction of retirement homes - thus it is presented here under "false pretences".	<p>The Minister supports the proper planning of communities and the development of community infrastructure necessary to sustain them in a manner which seeks to ensure that places are sustainably developed. The Minister remains to be convinced that the accretion of sites on the edge of the built-up area for the exclusive development of low density homes for the elderly represents the best way to plan for the ageing society in a way that ensures that elderly members of the community can best engage and receive the support that they need from the local communities of which they are part and the Island's health services.</p> <p>The Minister will, therefore, need to ensure that communities have sought to explore all alternatives in seeking to plan for the needs of the ageing society from within existing built-up areas, in a way that makes best use of land and buildings and which takes account of enhanced community health provision, before consideration is given to the release of greenfield land for this purpose.</p>
				As regards this and the other proposals referred to in this consultation, the impact on traffic flows and the adequacy of and impacts on the roads and access to public services systems do not seem to be included as part of the assessment.	In the event that this site is rezoned for housing development, it is recognised that there would need to be an improvement to the junction of La Rue de la Croute and La Route de Vinchelez and possibly some localised widening of La Rue de la Croute.
IR(1) -64	Mr David Brown		Objecting	<p>This development is wholly inappropriate for the location. I am not sure where anyone thinks the 100+ cars are going to enter and leave this tightly packed location. If the entry and access is in the only available place then the States would be creating a sure fire accident Black Spot it being a largely blind junction by virtue of its oblique angle to the main road.</p> <p>Probably not an official turning point but this is also where the local buses often attempt a 3 point (usually more !) turn.</p>	<p>In the event that this site is rezoned for housing development, it is recognised that there would need to be an improvement to the junction of La Rue de la Croute and La Route de Vinchelez and possibly some localised widening of La Rue de la Croute.</p> <p>The provision of pedestrian facilities is also a material consideration and the Minister is advised by the Parish of St Ouen that a pedestrian link from Field 622 to La Petite Fosse can be provided.</p>

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				Almost as bad as the cars would be the foot flow from such an estate as people attempt to cross at the above mentioned forthcoming Black Sport (from the side with no pavement) to endeavour to make it to the other side - which I would point out - equally doesn't have a pavement ! Until you have walked further down on the WRONG side of the road (ie not facing the traffic). So a bridge or underpass would be the safest option and I cant see that being either economically viable or particularly visually desirable.	
IR(1) -33	Mr Gary Le Brocq		Objecting	<p>This will now be the 4th time this field has been put forward for rezoning/development. If it was suitable for development, would it have been refused so many times? Clearly not. It is totally unacceptable to carve up a large well utilised and therefore valuable agricultural field in this manner. The reasons for which are endless. To name but a few, the access/visibility for traffic entering into the small green lane either side, the proximity to the marsh land on hydrangea avenue, the fact that this is 'green zone' and has no buildings on it whatsoever. There are other sites proposed that are greenhouse sites for example. They would make sense, this simply does not.</p> <p>This is a welcome (and indeed environmentally essential) break in an incredibly densely populated part of the parish. The planning ombudsman back in the 70's claimed the buildings to the east of the field to be the last buildings to be allowed in this area because of the environmental impact on the marsh. That marsh has not moved so why would this judgement no longer apply?</p> <p>A much needed and welcome break in a parish which is meant to be 'rural'. It has been refused on several occasions for a low lying single storey development for the elderly so why on earth this field features in this proposal is inconceivable. There are many alternatives and in keeping with the previous planning indications when the village developments were originally contemplated/built, it is clear that the land to the north of the main village (for example field no's 585 &amp; 584) would be a more obvious and feasible extension to the villages that already exist.</p> <p>These were 'lesser protected' before the IP for good reason, they are ripe for development. Development on either field on the scale proposed could be self contained rather than carving up a much larger field 622! Also the alternatives would not impact on the environment, nor encroach on any of the neighbouring properties in any way. They would provide good traffic access/visibility and afford ample opportunity for 'traffic calming' measures, such as pedestrian crossings' if required. 622 must remain green zone, the Marsh cannot be picked up and moved (!) and one simply cannot ignore the planning stance back in the 70's on this.</p>	See response to IR(1) -53
IR(1) -36	Mr GJ Le Main		Objecting	<p>I object to any form of development in this area on the same grounds as the original planning decisions made in the 70's, the basis of which should be upheld. This was due to the proximity of the marsh and of course maintained that any extension of the village should/would organically creep north bound of the original village.</p> <p>Better alternatives exist in that area (fields 584 &amp; 585) and these should be considered for this purpose as a more obvious and appropriate solution.</p>	See response to IR(1) -53
IR(1) -67	Mr James Godfrey	Royal Jersey Agricultural & Horticultural Society	Objecting	This is an important agricultural field that directly affects the viability of the last remaining dairy herd in the parish of St Ouen. It also forms part of a very viable block of agricultural land and, if permitted, will likely lead to creeping development of the rest.	<p>Comments noted</p> <p>The Minister is only minded to continue to consider the release of valuable greenfield land for this purpose where he is convinced that:</p> <ul style="list-style-type: none"> <li>the sponsors of the site's development are willing and can demonstrate that they are able to develop the site for the creation of homes that contribute towards the Island's housing needs, as evidenced by the Housing Gateway and;</li> <li>it is demonstrated that there are no other viable development opportunities to meet the Parish's aspirations within the existing Built-up Area boundary.</li> </ul>

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IR(1) -37	Mr Jason Lees-Baker		Objecting	<p>NE2.1 As a general rule any development on Green zone will adversely affect the natural environment whilst development on an agricultural field also damages the economy of the rural environment.</p> <p>NE2.7 Development of the Green Zone is in direct contravention of the Commitment the Island has made in relation to the Convention on Biological Diversity.</p> <p>NE2.9 The proposed development will potentially cause an adverse impact to the natural environment in respect of loss of fields and meadows; loss of trees and hedgerows; intrusion of building and materials; the pollution of water courses and damage to food chains.</p> <p>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 have an adverse impact on agriculture. I am not aware that an Environmental impact study has been commissioned. Without such a study will the Planning and Environment Minister and the Inspector be able to accurately determine the extent of adverse environmental impact?</p> <p>NE2.76 'E1 North West Headland (St Ouen) forms an important part of the green zone and any incursion into it is specifically mentioned as a threat to the natural environment.</p>	<p>In reviewing parts of the Island Plan to address the issue of the need for affordable homes, the Minister is able to consider the designation of land within the Island Plan afresh. In so doing, the Minister must balance and weigh the social, economic and environmental considerations that apply in each case.</p> <p>In the event that this site is rezoned for residential development, the impact of any development on this site will need to be carefully researched and evaluated and any adverse effect upon the area's ecological value avoided, mitigated or offset.</p>
				<p>NE2.11 and ERE1 The rural economy strategy sets out to protect agricultural land and is opposed to the loss of good agricultural land. There is a presumption against the permanent loss of good agricultural land for development or other purposes. Field 622 is a square gently sloping actively farmed large agricultural field. The proposal is to utilise over half of the field and this will result in the ruination of the entire field for agricultural purposes.</p> <p>NE2.15 Public attitude has hardened against further development of housing on green field sites as set out in Imagine Jersey 2035 (gov.je) and the Island Plan Strategic Options Green Paper (consult. Gov.je). The proposed development in the green zone is directly opposed to such public opinion and thus Jersey political will. As demonstrated by the number of objectors to the proposal. (166).</p> <p>NE2.85 There is no benefit to the rural economy, either agriculture or tourism in exchange for the loss of agricultural land.</p>	<p>The Minister acknowledges the importance of protecting the countryside and safeguarding agricultural land and is only prepared to continue to consider the release of greenfield land on the edge of existing rural settlements where;</p> <ul style="list-style-type: none"> <li>the sponsors of the site's development are willing and can demonstrate that they are able to develop the site for the creation of homes that contribute towards the Island's housing needs, as evidenced by the Housing Gateway and;</li> <li>it is demonstrated that there are no other viable development opportunities to meet the Parish's aspirations within the existing Built-up Area boundary.</li> </ul>
IR(1) -17	Mr John Shenton		Supporting	This site would appear to meet the criteria for affordable homes	Noted
IR(1) -215	Mr L R Le Brocq		Objecting	<p>Please, please, no more buildings on green sites. There are sites that are available, but not on a large field like this.</p>	<p>The Minister acknowledges the importance of protecting the countryside and safeguarding agricultural land and is only prepared to continue to consider the release of greenfield land on the edge of existing rural settlements where;</p> <ul style="list-style-type: none"> <li>the sponsors of the site's development are willing and can demonstrate that they are able to develop the site for the creation of homes that contribute towards the Island's housing needs, as evidenced by the Housing Gateway and;</li> <li>it is demonstrated that there are no other viable development opportunities to meet the Parish's aspirations within the existing Built-up Area boundary.</li> </ul>
				<p>I have tried to get information on how many houses are in the pipeline as I feel they should be completed before any more development (1) Girls College, (2) West Mount, (3) Trinity, (4) Gas Work, (5) Rouge Bouillon, (6) Sion Chapel to name a few.</p>	<p>Data on the latest residential land availability is available here: ( see Residential Land Availability (@ Jan 2013)</p> <p><a href="http://www.gov.je/SiteCollectionDocuments/Planning%20and%20building/IRPI%20BT6%20-%20Residential%20Land%20Availability%20Report%20-%20January%202013.%2020131101%20mm.pdf">http://www.gov.je/SiteCollectionDocuments/Planning%20and%20building/IRPI%20BT6%20-%20Residential%20Land%20Availability%20Report%20-%20January%202013.%2020131101%20mm.pdf</a> . )</p>



Ref	Name	Agent/ Organisation	Supporting/ Objecting	Reasons for answer	Minister's Response
				The States have let population growth get out of control and in my opinion this is putting a great pressure on your dept, this is the problem. I am a St Ouennais. I was born in the Parish.	Comment noted.
IR(1) -103	Mr M Palmer		Objecting	This site has already been turned down three times, twice following a public Inquiry. The States need to listen to the professional views of the Inspectors that they employed. Development on agricultural green zone sites should be stopped.	The issues raised by the Planning Inspector at the public inquiry into the development of F.622 to provide homes for the elderly of the parish remain to be addressed. The inspector's report was issued after the Minister had published his proposals to amend the Island Plan. It will remain a material consideration as to how the Minister will take his proposals forward.
IR(1) -193	Mr Mark Miles		Objecting	I would be interested to know why this field is being considered for Social housing , when first and foremost it is green zone and actively used by the or one of the last remaining Diary farmers in St Ouen, secondly St Ouen's own application for a more considerate and sympathetic housing scheme for the aged was knocked back on the basis it is green zone. This smacks of hypocrisy !!! I strongly object to this proposed development.	See response to IR(1) -170
IR(1) -109	Mr Mathew Costard		Objecting	<p>I have studied the interim review of the 2011 Island Plan on-line, and strongly OBJECT to that part of Policy H5 (Housing in Rural Centres ) which relates to the proposed re-zoning and development of Field 622, La Rue de la Croute, St. Ouen.</p> <p>My objection is principally on the ground that the proposed Category A development would be an unacceptable intrusion into what is currently Green Zone. In short, it would cause "serious harm to the landscape character of the area" as defined by Policy NE7.</p> <p>As I recall, some time ago an Ombudsman panel stated that no further development should occur west of the east boundary of Field 622, as the area is considered to be very sensitive in view of its close proximity to the Le Marais marshland. I believe that the proposed development would be ecologically harmful, in that it would involve significant drainage works, owing to the high water table.</p> <p>The proposed development would urbanise what is essentially an area of attractive rural character. The east side of the village has already seen a great deal of development over the past 40 years, but it is at least contained at present, and the built up environment in the vicinity of the Parish Hall is largely mitigated by the more open outlook on the west side. Building on Field 622 would destroy that balance and it would inevitably create a precedent for further infill, "creeping" towards La Route du Marais.</p> <p>Field 622 has been actively and productively farmed for centuries, and the Island cannot afford to lose such fine agricultural land. Even if the development were restricted to a 4 vergeé section of the field, as proposed, it would make the remaining part uneconomical to farm, thus paving the way for further housing expansion within the existing field boundary.</p>	<p>In reviewing parts of the Island Plan to address the issue of the need for affordable homes, the Minister is able to consider the designation of land within the Island Plan afresh. In so doing, the Minister must balance and weigh the social, economic and environmental considerations that apply in each case.</p> <p>The Minister acknowledges the importance of protecting the countryside and safeguarding agricultural land and is only prepared to continue to consider the release of greenfield land on the edge of existing rural settlements where;</p> <ul style="list-style-type: none"> <li>the sponsors of the site's development are willing and can demonstrate that they are able to develop the site for the creation of homes that contribute towards the Island's housing needs, as evidenced by the Housing Gateway and;</li> <li>it is demonstrated that there are no other viable development opportunities to meet the Parish's aspirations within the existing Built-up Area boundary.</li> </ul> <p>In the event that this site is rezoned for residential development, the impact of any development on this site will need to be carefully researched and evaluated and any adverse effect upon the area's ecological value avoided, mitigated or offset.</p>
				In addition to the aesthetic and ecological issues that I have raised, the location of Field 622 renders the proposed development unsuitable on practical grounds; it is approached by a narrow green lane with awkward vehicular access, whilst the junctions of the lane on to La Route de Vinchelez and La Route du Marais are hazardous. In order to improve that access it would be necessary to widen and/or realign the lane (presumably, on the La Route de Vinchelez side), thus further undermining the rural character and cohesiveness of the area.	In the event that this site is rezoned for housing development, it is recognised that there would need to be an improvement to the junction of La Rue de la Croute and La Route de Vinchelez and possibly some localised widening of La Rue de la Croute.



Ref	Name	Agent/ Organisation	Supporting/ Objecting	Reasons for answer	Minister's Response
				On 27 August 2013, a planning application submitted by the Parish of St. Ouen for homes for the elderly on Field 622 was (after two earlier rejections) finally turned down. This came after three years of lobbying by parishioners, on the grounds that the development would be an intrusion in the Green Zone. That decision is, I believe, highly material in the context of the proposed Category A development. I trust that this objection will be given serious consideration.	The issues raised by the Planning Inspector at the public inquiry into the development of F.622 to provide homes for the elderly of the parish remain to be addressed. The inspector's report was issued after the Minister had published his proposals to amend the Island Plan. It will remain a material consideration as to how the Minister will take his proposals forward.
IR(1) -32	Mr Michael Stein	MSPlanning Ltd	Supporting	In spite it being a green field site, the demand for affordable housing justifies its re-zoning	Noted
IR(1) -130	Mr Paul Harding	BDK Architects	Neither	No comments on two sites (Field 622, St Ouen & Field 402, St Martin), but Objecting about Field 785, St. Ouen.	Noted
IR(1) -224	Mr Paul Le Brocq		Objecting	Leave as agricultural land - why for 6 years want to develop. Local don't want it.	In reviewing parts of the Island Plan to address the issue of the need for affordable homes, the Minister is able to consider the designation of land within the Island Plan afresh. In so doing, the Minister must balance and weigh the social, economic and environmental considerations that apply in each case.
IR(1) -23	Mr Peter Thorne		Supporting	I support strongly. This site is far and away the best site, particularly given its location close to the village centre.	Noted
IR(1) -35	Mr Robert Blackmore		Objecting	This field has been rejected three times at great expense for building primarily because it is in the Green Zone and is certainly not suitable for a larger scale project like affordable housing.	<p>The Minister acknowledges the importance of protecting the countryside and safeguarding agricultural land and is only prepared to continue to consider the release of greenfield land on the edge of existing rural settlements where;</p> <ul style="list-style-type: none"> <li>the sponsors of the site's development are willing and can demonstrate that they are able to develop the site for the creation of homes that contribute towards the Island's housing needs, as evidenced by the Housing Gateway and;</li> <li>it is demonstrated that there are no other viable development opportunities to meet the Parish's aspirations within the existing Built-up Area boundary.</li> </ul>
IR(1) -225	Mr Stephen Poidevin		Objecting	Leave St Ouen's as it is. No more building, it is countryside not a city. Enough housing to sell on the market, let alone all the housing applications recently passed from large building companies. To build more houses people can not afford.	<p>The decision to provide more affordable and social housing is a key action of the States Strategic Plan 2012.</p> <p>The latest evidence on affordability indicates that open market housing, which includes some of the sites referred to, is beyond the reach of many people in Jersey (see: <a href="http://www.gov.je/Government/JerseyWorld/StatisticsUnit/Prices/Pages/HousingAffordability.aspx">http://www.gov.je/Government/JerseyWorld/StatisticsUnit/Prices/Pages/HousingAffordability.aspx</a>)</p>
IR(1) -34	Mr Tony Wilkinon		Objecting	Field 622 is green zone and a productive agricultural field. Alternative non-green-field sites exist for this development. I am also concerned about the already limited access near Rue de la Croute and the potential impact on the marsh along Hydrangea Avenue. More generally, it will render the current (and future) designation of green zone redundant.	See response to IR(1) -109

Ref	Name	Agent/ Organisation	Supporting/ Objecting	Reasons for answer	Minister's Response
IR(1) -214	Mrs Antoinette Keylock		Objecting	<p>If sheltered housing for the elderly was rejected on the grounds of 'green zone', how can a proposal for 'social housing' be appropriate?</p> <p>As an 80 year old candidate for sheltered housing, with a lease due to expire in my currently rented accommodation in 3 ½ years, where do you propose to build 'sheltered homes' if turned down in field 622?</p>	<p>The Minister for Planning and Environment is concerned to ensure that residential development contributes towards the Island's pressing need for affordable homes as proposed by his amendment to the 2011 Island Plan: this changes the definition of Cat A homes and access to them, which is based on people's income level (i.e. median income or below), and which is managed by the Strategic Housing Unit by assessment through the Housing Gateway.</p> <p>This does not preclude the occupation of any homes by parishioners or those with connections to the parish, or by people over-55, but only where they qualify through the Housing Gateway operated by the Strategic Housing Unit.</p> <p>The Minister also considers that the building of new homes is not the only way to deal with the needs of the ageing society and that there is a need to review the potential adaption of existing homes and the potential to redevelop the parish's existing stock to increase the level of sheltered accommodation that might be available in the parish.</p> <p>The Minister supports the strategy of seeking to ensure that elderly members of our communities can stay living in their own homes, supported by the networks with which they are familiar and which can address health needs, for as long as possible, and indeed this is an objective of the States Strategic Plan 2012 and a critical plank in the Island's new health strategy (Health and Social Services: a new way forward P.82/2012). It is relevant to note that the health strategy seeks to increase the number of service users being cared outside of a hospital or residential care setting and seeks to enhance community services to develop and deliver care to an individual's home.</p> <p>Since 2007 all new homes in Jersey have been built to local Lifetime Homes standards (amended in 2012), which includes improved provision for access to, use and adaptation of dwellings to better meet the requirements of an ageing society and which better enables people to remain in their own homes for as long as possible: this is required through Building Bye-Laws.</p> <p>In addition to this response to the needs of an ageing society in all new homes, there is a healthy level of provision of development schemes specifically for the over-55s (for sale and rent) on sites throughout the Island currently: at the beginning of the year there were outstanding commitments of some 350 homes specifically for the over-55s. These may provide additional features over and above the existing Jersey Lifetime Home standard (such as an additional bedroom), or just be a site-specific collection of new homes exclusively for people aged over-55.</p> <p>This does not include planned redevelopments and refurbishments of existing Housing Department sites, which are producing numbers of affordable social rented units aimed at older, less mobile members of the community. There will also be significant opportunities for private 'windfall' developments throughout the built-up areas of the Island where private developers can address identified housing demand.</p> <p>The Minister also supports the proper planning of communities and the development of community infrastructure necessary to sustain them in a manner which seeks to ensure that places are sustainably developed. The Minister remains to be convinced that the accretion of sites on the edge of the built-up area for the exclusive development of low density homes for the elderly represents the best way to plan for the ageing society in a way that ensures that elderly members of the community can best engage and receive the support that they need from the local communities of which they are part and the Island's health services.</p> <p>The Minister will, therefore, need to ensure that communities have sought to explore all alternatives in seeking to plan for the needs of the ageing society from within existing built-up areas, in a way that makes best use of land and buildings and which takes account of enhanced community health provision, before consideration is given to the release of greenfield land for this purpose.</p>
IR(1) -26	Mrs Judy Martin		Supporting	hey need young people to buy in this parish and this could help	Comment noted.
IR(1) -31	Mrs Lucy Blackmore		Objecting	This will never return to green land again. I don't feel it is something that there is a huge need for in the area. The roads will not be able to deal with this sort of traffic.	See response to IR(1) -37

Ref	Name	Agent/ Organisation	Supporting/ Objecting	Reasons for answer	Minister's Response
IR(1) -201	Mrs Madeleine Poole		Objecting	<p>This large agricultural field is used throughout the year for agricultural purposes and as stated by Mr. David Bushby in the Public Enquiry report submitted 7th August 2013, the field is of good agricultural soil. It is essential that the Island maintains a strong land bank of productive agricultural land and field 622 falls into this category.</p> <p>St.Ouen has Brown Zone sites suitable for development and these should be utilised for development.</p>	<p>The Minister acknowledges the importance of protecting the countryside and safeguarding agricultural land and is only prepared to continue to consider the release of greenfield land on the edge of existing rural settlements where;</p> <ul style="list-style-type: none"> <li>the sponsors of the site's development are willing and can demonstrate that they are able to develop the site for the creation of homes that contribute towards the Island's housing needs, as evidenced by the Housing Gateway and;</li> <li>it is demonstrated that there are no other viable development opportunities to meet the Parish's aspirations within the existing Built-up Area boundary.</li> </ul>
				<p>Field 622 has been subjected to two public inquiries, at considerable expense to the Island tax payer. In both cases Field 622 was rejected by the Inspectors for rezoning. It was also rejected by the previous Planning Minister, Senator Cohen. It has been rejected as a significant departure from policies H5 and NE7.</p> <p>The professional view of two independent Inspectors seems to have been totally ignored by your department.</p>	<p>Whilst the planning inspectors who reviewed the 2011 Island Plan recommended that the Minister should not zone the site for residential development at that time, they did consider that the site <i>'relates well to the village and in the event of the preparation of a Village Plan, it might provide a suitable site for consideration for affordable housing to meet local needs'</i>.</p> <p>The issues raised by the Planning Inspector at the public inquiry into the development of F.622 to provide homes for the elderly of the parish remain to be addressed. The inspector's report was issued after the Minister had published his proposals to amend the Island Plan. It will remain a material consideration as to how the Minister will take his proposals forward.</p> <p>The professional views of planning inspectors are not, therefore, ignored: they are weighed carefully along with all other material considerations.</p>
				<p>Your department now considers that Field 622 should be re-submitted for Social Housing at the Island Review which will be taking place shortly. ANOTHER Inspector will be required, again at great expense to the tax payer, to oversee this next enquiry. I wish to attend any future public inquiry and have the opportunity to speak as an objector to any proposed development in Field 622. I state again my strong objection to this proposed development.</p>	<p>The Minister is required to engage the services of a planning inspector when a planning application represents a major departure from the Island Plan and when he wishes to amend the Island Plan: these are requirements under law.</p> <p>A process of administration that is open, transparent and subject to independent and impartial scrutiny, and which enables stakeholders to engage in it, will inevitably entail cost</p>
IR(1) -101	Mrs N Palmer		Objecting	We need greenfield sites to remain intact to support the agricultural industry.	See response to IR(1) - 89
IR(1) -15	Mrs Rosemary Evans		Objecting	It is using agricultural land	See response to IR(1) - 89
IR(1) -222	Mrs V Remon		Supporting	As one of the Senior Citizens of the Parish (and you will see occupying one of the Clos de Mahaut development) I would like to emphasize the urgent need for more sheltered accommodation in the Parish as there are over 70 people on the waiting list. I would therefore ask you to reconsider your decision and rezone field 622, La Rue de la Croute, St Ouen, for that purpose.	Comment noted
IR(1) -126	Neil & Heather Broom		Objecting	We are writing to register our objection to the development of field 622 in Rue de la Croute, St. Ouen as this is part of the green zone and should not be re-zoned. If this is made a precedent, then where does re-zoning stop, and what is the point of the island plan? We are both residents of St. Ouen and eligible to vote in elections.	See response to IR(1) - 89
IR(1) -132	Nicholas Poole		Objecting	<p>I write to submit my strong objections to the proposed rezoning and development of Field 622, St. Ouen.</p> <p>This large agricultural field is used throughout the year for agricultural purposes and as stated by Mr. David Bushby in the Public Enquiry report submitted 7 th August 2013, the field is of good agricultural soil. It is essential that the Island maintains a strong land bank of productive agricultural land and field 622 falls into this category. St.Ouen has Brown Zone sites suitable for development and these should be utilised for development.</p> <p>Field 622 has been subjected to two public inquiries, at considerable expense to the Island tax payer. In both cases Field 622 was rejected by the Inspectors for rezoning. It was also rejected by the previous Planning Minister, Senator Cohen. It has been rejected as a significant departure from policies H5 and NE7. The professional view of two independent Inspectors seems to have been totally ignored by your department.</p>	See response to IR(1) -201

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				<p>Your department now considers that Field 622 should be re-submitted for Social Housing at the Island Review which will be taking place shortly. ANOTHER Inspector will be required, again at great expense to the tax payer, to oversee this next enquiry.</p> <p>I wish to attend any future public inquiry and have the opportunity to speak as an objector to any proposed development in Field 622. I state again my strong objection to this proposed development.</p>	
IR(1) -216	P A Le Brocq		Objecting	<p>The States need to bring in population laws. When will the Planning office learn to listen to the people who count and do not want any more building on green zones such as field No 622 - It has already been rejected on more than once before.</p> <p>Very soon thanks to the Planning Office, Jersey will be very soon one big building mass - no fields left for gazing animals. Too many people and cars spoiling our lovely island.</p> <p>Listen not ignore the people of St Ouen.</p>	<p>The Island Plan simply seeks to respond to the direction provided by the States Strategic Plan and does not determine policy related to population and immigration.</p> <p>The decision to provide more affordable and social housing is a key aim of the States Strategic Plan 2012.</p> <p>The latest evidence on affordability indicates that open market housing is beyond the reach of many people in Jersey (see: <a href="http://www.gov.je/Government/JerseyWorld/StatisticsUnit/Prices/Pages/HousingAffordability.aspx">http://www.gov.je/Government/JerseyWorld/StatisticsUnit/Prices/Pages/HousingAffordability.aspx</a>)</p>
IR(1) -210	P Le Saux		Objecting	<p>See attached letters I understand that I have to put my name forward before the 28th September 2013 to enable me to speak at any future public enquiries or meetings that might arise with reference to field 622 St. Ouen.</p> <p>I assume that we, the residents of La Croute will be able to use our paperwork and findings that we have used in the last two Public Inquiries that we have attended, together with any new information that we might consider as being appropriate for future Public Inquiries at a later date.</p>	<p>Details about the forthcoming Examination in Public will be provided by the Planning Inspectors to potential participants in due course.</p>
				<p>Please can you explain to me why we have to have another Public Inquiry after all field 622 has been rejected three times since 2007.</p>	<p>In reviewing parts of the Island Plan to address the issue of the need for affordable homes, the Minister is able to consider the designation of land within the Island Plan afresh.</p> <p>The Minister is required to hold a public inquiry or an Examination in Public when a planning application represents a major departure from the Island Plan and when he wishes to amend the Island Plan: these are requirements under law.</p> <p>Whilst the planning inspectors who reviewed the 2011 Island Plan recommended that the Minister should not zone the site for residential development at that time, they did consider that the site <i>'relates well to the village and in the event of the preparation of a Village Plan, it might provide a suitable site for consideration for affordable housing to meet local needs'</i>.</p> <p>The issues raised by the Planning Inspector at the public inquiry into the development of F.622 to provide homes for the elderly of the parish remain to be addressed. The inspector's report was issued after the Minister had published his proposals to amend the Island Plan. It will remain a material consideration as to how the Minister will take his proposals forward.</p>
IR(1) -227	Patricia Hunter		Objecting	<p>I understand that field 622 is under threat of being rezoned for social housing. Can you please advise me as to how it is possible to change the use of a green field site when there are other sites in the parish that could be utilised and it is not in the Island Plan.</p> <p>I am sure you wish to be totally transparent about such changes and I should like the committee to explain how it is possible that such huge changes can be justified, especially as field 622 was rejected for any housing (including for the elderly) only a few months ago.</p> <p>I find it very difficult to understand how a field planning application which has been turned down twice for a project to which funds have been generously donated can suddenly be considered for another type of housing i.e. now "Social Housing" which was never part of the initial plan as this was strictly for housing for "the Elderly". Therefore when I comment on systems being transparent one should not have to be confused by sudden change of thinking without all involved being taken into consideration.</p>	<p>The Minister's proposed amendment which seeks to provide additional housing supply is based on the latest evidence of housing supply, demand and affordability provided by the 2012 Housing Needs Survey (undertaken as part of JASS); the Housing Affordability Report and the latest Residential Land Availability report: this indicates that there is considered to currently be a reasonable level of supply of sheltered housing throughout the Island, albeit that there is no new provision specifically within the parish of St Ouen.</p> <p>The Minister for Planning and Environment is concerned to ensure that residential development contributes towards the Island's pressing need for affordable homes as proposed by his amendment to the 2011 Island Plan: this changes the definition of Cat A homes and access to them, which is based on people's income level (i.e. median income or below), and which is managed by the Strategic Housing Unit by assessment through the Housing Gateway.</p> <p>This does not preclude the occupation of any homes by parishioners or those with connections to the parish, or by people over-55, but only where they qualify through the Housing Gateway operated by the Strategic Housing Unit.</p>



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				<p>As far as I can see this is causing much unhappiness with almost a split in views of ratepayers which in my view should be avoided at all costs. I think that another problem has been caused quite unintentionally by previous decisions having been carried out in the parish without all the facts being put down on paper. In the old days this system seemed to work but in current times this is totally out of date as many people, and particularly ratepayers, like to see and know what decisions are being made on their behalf. Therefore there should be a proper parish plan for St. Ouen in which all proposed development is considered and once made, this should be stuck to so that anyone buying property knows exactly how to go ahead and should not have disputes suddenly thrust upon them.</p> <p>Also it is very important that public money is not wasted on reconsidering previously turned down projects. As we know there are other sites in the parish which could be considered for future planning such as dilapidated green house sites and perhaps the area around the old telephone exchange may become available which would in any case have better access and should a green zone have to be rezoned it would not cause so much stress to the ratepayers (and I imagine our new Connétable ) of St. Ouen.</p> <p>I am most grateful to know that you are concerned by the views of an ordinary ratepayer of this beautiful agricultural parish.</p>	<p>The Minister acknowledges the importance of protecting the countryside and safeguarding agricultural land and is only prepared to continue to consider the release of greenfield land on the edge of existing rural settlements where;</p> <ul style="list-style-type: none"> <li>the sponsors of the site's development are willing and can demonstrate that they are able to develop the site for the creation of homes that contribute towards the Island's housing needs, as evidenced by the Housing Gateway and;</li> <li>it is demonstrated that there are no other viable development opportunities to meet the Parish's aspirations within the existing Built-up Area boundary.</li> </ul>
IR(1) -92	Paul Green		Objecting	I object to the development of Field 622. It is a green field site and used throughout the year for agriculture. Brown field sites in the Parish should be developed and green field sites preserved for agriculture..	See response to IR(1) - 89
IR(1) -206	Paul Le Marrec		Objecting	<p>I object to the proposed rezoning of green zone land specifically Fields 622 and 785 in St Ouen and 402 in St. Martin.</p> <p>To rezone such land prior to the 2014 Housing Needs Survey is premature given the projected surplus of A and B category housing already identified for the period to 2020. In addition, an independent assessment of the demand for properties in the specific locations should be undertaken.</p>	<p>The Minister's proposed amendment which seeks to provide additional housing supply is based on the latest evidence of housing supply, demand and affordability provided by the 2012 Housing Needs Survey (undertaken as part of JASS); the Housing Affordability Report and the latest Residential Land Availability report: any response made in relation to this data is not considered to be premature and is required to be undertaken if the Island's housing needs are to be eased.</p>
				<p>Prior to any further loss of rural land alternative sites in the built up area should be considered; including the potential redevelopment of existing vacant (and potentially vacant) offices given the significant planned office developments currently in train at the Esplanade and other sites.</p>	<p>The thrust of the Spatial Strategy of the 2011 Island Plan remains unaltered by the Minister's proposed amendments such that most of the Island's development needs should be met from within the existing built-up area: the proposed rezoning of land would, in total, provide about 350 homes out of a total supply of over 3,500.</p> <p>Also see response to IR(1) – 89 about the need to demonstrate that no suitable land within the existing BUA cannot meet the need for this development.</p>
IR(1) -209	Peter G Hougueuz		Objecting	I am writing to you to ask that my name is put forward to enable me to take part in any future public enquiries or meetings with reference to Field 622, St.Ouen.	Details about the forthcoming Examination in Public will be provided by the Planning Inspectors to potential participants in due course.
IR(1) -50	Philip Bolton		Objecting	Environmental sensitivity!	Comment noted
IR(1) -48	President Graham J Le Lay	JERSEY FARMERS' UNION	Objecting	<p>See Attached letter dated 10th September 2014 One of the main objectives of the Jersey Farmers' Union is to maintain a Policy of preserving agricultural land to ensure the continuance of a viable Agricultural / Horticultural Industry for the benefit of farmers and growers and the Island as a whole. There is currently a strong demand for agricultural land throughout the Island. This can be evidenced by all viable agricultural land, be it large areas or small pockets of land previously being uncultivated, now being utilised. All grades of land from prime agricultural land, secondary quality land, pastureland and meadowland can serve a purpose within the Industry; be it for the cultivation of all crops to bovine grazing for the Dairy Industry.</p> <p>The supply of agricultural land is finite and this must be safeguarded. Farmers and growers are the guardians of the countryside and a viable Agricultural Industry is the most cost-effective way of managing the environment. The preservation and protection of agricultural land will encourage a sustainable and diverse Agricultural Industry and a vibrant Industry produces high quality</p>	See response to IR(1) - 89



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				produce and creates employment. A potential future world food shortage has been widely documented and should this materialise, the Industry will be required to help ensure the Island becomes as self-sufficient as possible. The Union would therefore like to object to Policy H5: Housing in Rural Centres - the re-zoning of the following sites to provide Category "A" affordable housing on the above-mentioned grounds and the fact that we feel there are sufficient brown field sites which can be utilised prior to any green field sites being taken.	
IR(1) -104	R Barthorp		Objecting	Inappropriate site; poor access; green belt land should be sacrosanct; detrimental effect on marshland to west; setting precedent for development of last few areas of greenfield land near to St. Ouens village	See response to IR(1) -109
IR(1) -203	Sandra Fox		Objecting	As I will be away from the Island on Tuesday 24th September and unable to attend the meeting at St Ouen Parish Hall, I wish to place on record my objection to the plans for Field 622. My objection is based on the fact that field 622 is designated as green zone and is a productive agricultural field. Rue de la Croute has very limited access and any development could and most probably would have a detrimental effect on the marsh along Hydranga Avenue. I feel that the £80,000 paid by the parish in pursuing a planning application is excessive and feel that this money could have been put to better use within the parish.	The Parish meeting does not form part of this consultation process however the concern is noted. See response to IR(1) -109
IR(1) -205	Simon Bonn		Objecting	I would just like to raise my serious concerns that the Parish are not following due process in consulting the parishioners over the re zoning of this field. It cannot be right that a Parish meeting to discuss the question is cancelled at the last moment , preventing cases against the proposed re zoning being properly considered. An independent ombudsman should be available to assess cases such as these where planning and the Parish are bent on pursuing their own agendas. But in any event there can be no case passed if parishioners have not had been listened to and their voice respected.	The Minister is unable to comment on the process adopted by the Parish to seek the views of parishioners. This is entirely separate to any process, required under law, which the Minister must adhere to in seeking to amend the Island Plan. The Minister is seeking to amend the Island Plan to principally address the need for affordable homes: this proposal will go through a process of public consultation and independent review by planning inspectors before being considered by the States.
				It also seems strange that the existence of a brown field site that would meet any requirements for housing development is not being actively considered first. I am writing not as a resident but as a voter and long time resident of the island determined to see the green field system respected, and due process observed.	See response to IR(1) -109
IR(1) -127	Tamara Nance		Objecting	I am writing to you today because I am growing very concerned about the continual pressure for the Planning Department to rezone field 622 in St Ouen. I feel strongly that this field should be retained as agricultural land and not used for development of any kind. As this working field is within the green zone the impact of housing, especially densely populated social housing, will have a devastating impact on the surrounding farm land. If this development goes ahead there will be a serious threat in the future to all green zoned fields.	See response to IR(1) - 89
				We have to assess who the social housing is for and if this really is the right course of action to take for the country parishes in light of the Islands over population primarily due to immigration.	The Island Plan simply seeks to respond to the direction provided by the States Strategic Plan and does not determine policy related to population and immigration. The decision to provide more affordable and social housing is a key action of the States Strategic Plan 2012. The latest evidence on affordability indicates that open market housing is beyond the reach of many people in Jersey (see: <a href="http://www.gov.je/Government/JerseyWorld/StatisticsUnit/Prices/Pages/HousingAffordability.aspx">http://www.gov.je/Government/JerseyWorld/StatisticsUnit/Prices/Pages/HousingAffordability.aspx</a> )
IR(1) -52	Victoria Mills		Objecting	It is not within keeping of the local area and there are better sites that could be	See response to IR(1) - 89

Ref	Name	Agent/ Organisation	Supporting/ Objecting	Reasons for answer	Minister's Response
				used. There are direct properties that would be affected by the increased levels of noise and traffic and it would also impact upon their right of enjoyment of their properties. This is not the right field for its intended use and better locations could be found elsewhere.	
IR(1) -65	Anonymous		Objecting	the high density of housing in the area already	The Minister does consider that the density of housing in the area is high.
				the impact on traffic	In the event that this site is rezoned for housing development, it is recognised that there would need to be an improvement to the junction of La Rue de la Croute and La Route de Vinchelez and possibly some localised widening of La Rue de la Croute.
				pressure on local resources such as schools	The current and future ability of local schools to accommodate anticipated demand for places is material and ESC has advised that there is capacity.
				the importance of maintaining green land - possibly for allotments	See response to IR(1) - 89
IR(1) -39	Anonymous		Objecting	agricultural land	See response to IR(1) - 89
IR(1) -4	Anonymous		Objecting	another field gone	See response to IR(1) - 89
IR(1) -88	Anonymous		Objecting	Bad use of an agricultural field	See response to IR(1) - 89
IR(1) -80	Anonymous		Objecting	Being a resident of Rue de la Croute, I am very concerned at this proposal. I did not object to this site being used for sheltered housing but am not in favour of this being used for Social Housing. One of the reasons for the sheltered housing development being turned down was the apparent lack of demand for this type of housing. I am not aware that there is a demand for social housing in St. Ouen and cannot see that this would be justified.	The decision to provide more affordable and social housing is a key action of the States Strategic Plan 2012. The latest evidence on affordability indicates that open market housing is beyond the reach of many people in Jersey (see: <a href="http://www.gov.je/Government/JerseyWorld/StatisticsUnit/Prices/Pages/HousingAffordability.aspx">http://www.gov.je/Government/JerseyWorld/StatisticsUnit/Prices/Pages/HousingAffordability.aspx</a> )
				Furthermore, as already acknowledged there are concerns about vehicular access and the exit onto Route de Vinchelez which is hazardous. A social housing development would mean far more vehicles using this exit than for sheltered housing and I cannot see how this can be achieved without major changes. This is after all situated in a Green Lane.	In the event that this site is rezoned for housing development, it is recognised that there would need to be an improvement to the junction of La Rue de la Croute and La Route de Vinchelez and possibly some localised widening of La Rue de la Croute.
				My other concern is that if this is approved, it will open the door for further development on the western part of this field and also on Field 623 to the south. I am therefore wholeheartedly opposed to this proposal.	Comments noted.
IR(1) -87	Anonymous		Objecting	Has this not field not been the subject of several attempts to develop? On each occasion there have been successful objections because it is unsuitable for a variety of reasons. I note that a number of people have been inspired to object, and I will not attempt to rehash their eloquent reasoning.	Noted
IR(1) -7	Anonymous		Objecting	If you keep filling in green spaces around Jersey there will be no more green spaces left! Keep Jersey green.	See response to IR(1) - 89
IR(1) -56	Anonymous		Objecting	Loss of valuable green zone when more suitable alternatives exist. Why would the fields alongside the Hospice shop in St Ouen not be considered? They do not have the access or environment issues Field 622 has.	See response to IR(1) - 89
IR(1) -110	Anonymous		Objecting	Not a suitable for Social Housing, will cause increased traffic in a rural zone, additional public transport would be needed, as bus service is currently very limited to St Ouen.	The location of the field (adjacent to the built-up area and close to existing amenities and facilities) meets many of the Island Plan spatial strategy criteria. There is considered, by TTS, to be a reasonable public transport service in close proximity to this site.
				Further decrease in agricultural land which could be used for produce and live stock.	See response to IR(1) - 89
IR(1) -61	Anonymous		Objecting	There are other far more suitable locations within this parish that should be considered. Field 622 is a green field and as a non jersey person I am shocked	See response to IR(1) - 89

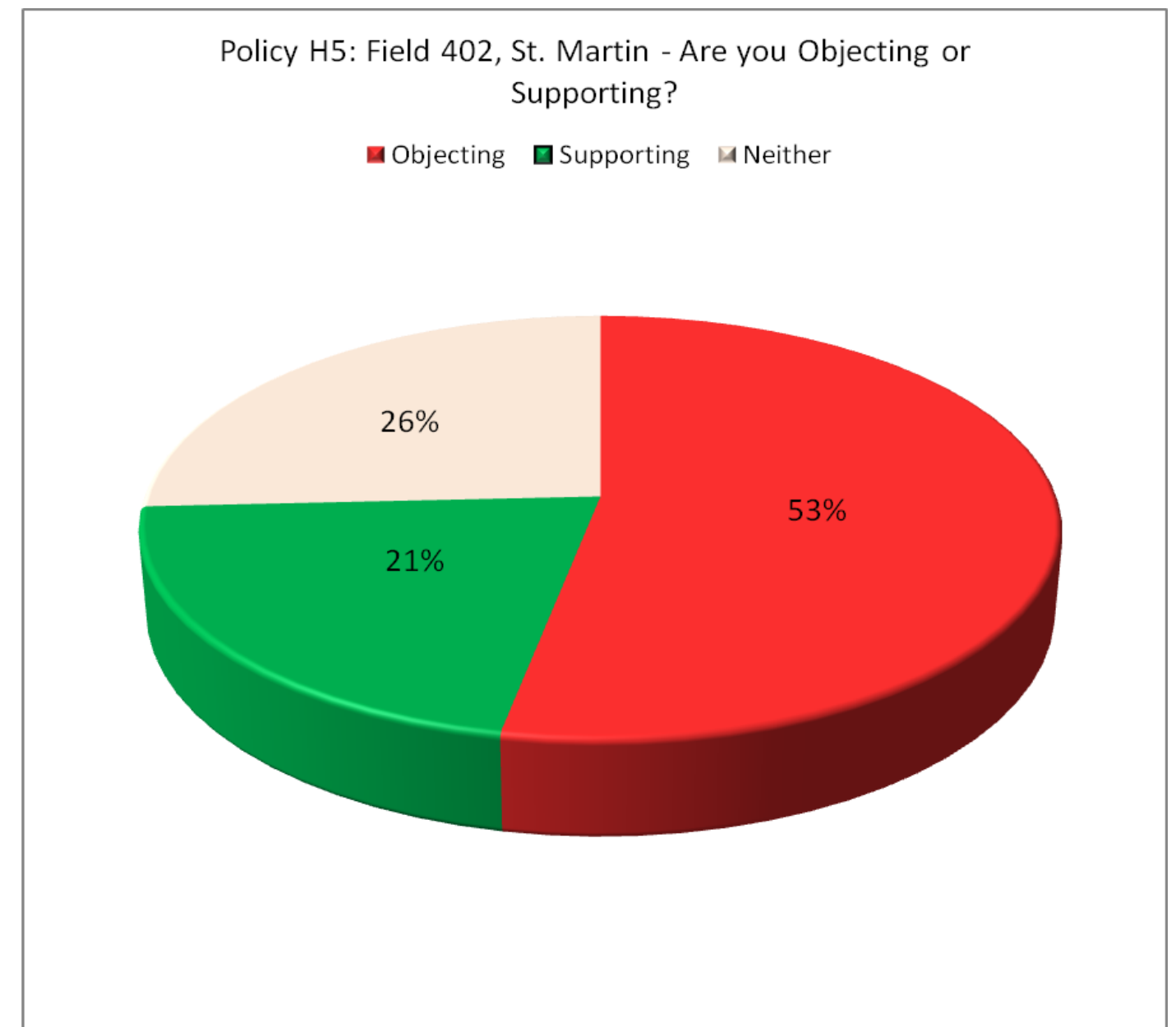
Ref	Name	Agent/ Organisation	Supporting/ Objecting	Reasons for answer	Minister's Response
				at the Islands seeming lack of regard for the beauty of this very rare jewel. Having seen both Plemont and Portelet I cease to be surprised by the planning that is passed.	
IR(1) -13	Anonymous		Objecting	Unfortunately you don't have a button for "Strongly Objecting". I do not see how a proposal to re-zone half a field can have seriously been put forward and undermines the credibility of this entire "consultation" process.	See response to IR(1) - 89
IR(1) -60	Anonymous		Objecting	We have now endured 3 declined objections in a six year period, 3 times this has been declined based on lack of reasonable basis for agreement. Why is this the only field that has been considered all this time no other other field has been considered even if a development were required. Why has no other field ever been considered at any time during this period .	See response to IR(1) - 89
IR(1) -105	Anonymous		Objecting	We must protect green fields at all costs - develop brown field sites first.	See response to IR(1) - 89

## Policy H5: Field 402, St. Martin

The Minister for Planning and Environment is proposing to re-zone Field 402, St. Martin for affordable housing under [policy H5](#)

### Questionnaire consultation results

	% Total	% Answer	Count
<b>Number of responses</b>	30%	-	66
<b>Objecting</b>	16%	53%	35
<b>Supporting</b>	6%	21%	14
<b>Neither</b>	8%	26%	17
<b>[No response]</b>	70%	-	153
<b>Total</b>	<b>100%</b>	<b>100%</b>	<b>219</b>



## Policy H5: Field 402, St. Martin - Comments

Ref	Name	Agent/ Organisation	Supporting/ Objecting	Reasons for answer	Minister's Response
IR(1) -87	Anonymous		Neither	I don't know where this is, so feel unqualified to take a view either way.	Comments noted.
IR(1) -131	Connétable Michel Le Troquer	States Member (Parish of St. Martin)	Neither	<p>See Letter Dated 21st September for full details of representation.</p> <p>It is accepted that affordable housing on Jersey will always be a problem due to size of the Island and the continued immigration issues. I am very sceptical that the challenge of having suitable and sufficient housing on the Island will ever be achieved. I appreciate the difficulty that you have in trying to provide affordable homes and I have indeed struggled like very many people still do today when starting out and getting onto the property ladder for the first time. The task you face is unenviable and even with the support on the Chief Minister, the Council of Ministers and all States Members is near impossible as we continue with this ever increasing population. Radical thinking is needed. I understand the onerous task of trying to please everyone and the need to find suitable sites for social rented houses.</p> <p>The St Martins Housing Association has a proven track record and experience in providing rural type homes in a country parish and has learned much from their first project off Rue de la Haye. This submission to the consultation is not forwarded to refuse or object to development in the Parish of St Martin. I believe parishioners would be more receptive to the St Martin's Housing Association proposals than those being put forward but will be seeking the views of parishioners in the near future, possibly by way of a Parish Assembly. There has been insufficient time to hold a Parish Assembly on the proposals that you have put forward but of course each and every parishioner has had the opportunity to make representations to you during the consultation period. I fear it will only be when the plans are passed and the diggers move on site that the objections will commence.</p> <p>I am aware that there are concerns that the current proposals and amendments make no provision of retirement or sheltered type homes. However I assume that once again a Parish would have to bring forward a proposition and proven need to you in order to seek the re-zoning of land.</p> <p>Again I accept the need to protect the countryside and "Green Zones" on the Island and the additional amenities and facilities required to cater for an increased population in the small rural parishes but that is problem to be faced on another day. It would appear that if an elderly couple in the Parish wish to sell their home or have to move out of rented accommodation then they will need to seek sheltered housing outside of the Parish in which they may have lived for many years. At this moment in time we are only able to provide 27 such units of suitable rented accommodation yet I would be delighted to build another complex if we were able to re-zone land that was to become available at an affordable price.</p> <p>I understand the difficulty you face of allowing additional development in small hamlets, developments that go on to become larger and larger and then need a variety of shops and facilities to cater for the greater numbers within those communities, ie; areas in St Peter, St John and St Ouen. I do not believe that St Martin falls into that category at this time.</p> <p>I thank you for your time in accepting this representation and I know that the Parish Officers as well as the St Martin's Housing Association would welcome the opportunity of working with Officers from your department in order to find a way forward.</p>	<p>The release of this site for residential development is sponsored by the Parish of St Martin. The Minister for Planning and Environment is concerned to ensure, however, that residential development contributes towards the Island's need for affordable homes.</p> <p>The Minister is only minded to continue to consider the release of valuable greenfield land for this purpose where he is convinced that:</p> <ul style="list-style-type: none"> <li>the sponsors of the site's development are willing and can demonstrate that they are able to develop the site for the creation of homes that contribute towards the Island's housing needs, as evidenced by the Housing Gateway and;</li> <li>it is demonstrated that there are no other viable development opportunities to meet the Parish's aspirations within the existing Built-up Area boundary.</li> </ul> <p>Policy H5 of the 2011 Island Plan already requires that evidence of need is demonstrated through the Housing Gateway. This does not preclude the occupation of any homes by parishioners or those with connections to the parish, but only where they qualify through the Housing Gateway operated by the Strategic Housing Unit.</p> <p>Policy H5 also requires that any proposals to rezone land outwith the BUA are set within the context of a Village Plan.</p>
IR(1) -177	Deputy John Le Fondré	States Member (St. Lawrence)	Neither	<p>Generally I am not supportive of greenfield development.</p> <p>If this is a site which is strongly supported by the Parish (including by Parish Assembly), Constable and Deputy. I may be persuaded, but at present I would not be supportive.</p>	<p>The Minister acknowledges the importance of protecting the countryside and safeguarding agricultural land and is only prepared to consider the release of greenfield land on the edge of existing rural settlements where;</p> <ul style="list-style-type: none"> <li>the sponsors of the site's development are willing and can demonstrate that they are able to</li> </ul>



Ref	Name	Agent/ Organisation	Supporting/ Objecting	Reasons for answer	Minister's Response
					<p>develop the site for the creation of homes that contribute towards the Island's housing needs, as evidenced by the Housing Gateway and;</p> <ul style="list-style-type: none"> <li>where it is demonstrated that there are no other viable development opportunities to meet the Parish's aspirations within the existing Built-up Area boundary.</li> </ul>
IR(1) -117	Deputy Steve Luce	States Member (St. Martin)	Neither	<p>I would wish to address the Inspector. As well as being the Deputy for St. Martin, I am still the Chairman of the St. martin's Village Development Committee.</p> <p>We have had our own Parish led plans for this field for a number of years. The Planning Department were aware of our views before this review of the Island Plan was published.</p> <p>I would wish to put the case for the retention of this field for Parish led affordable homes.</p>	<p>The release of this site for residential development is sponsored by the Parish of St Martin. The Minister for Planning and Environment is concerned to ensure, however, that residential development contributes towards the Island's need for affordable homes.</p> <p>The Minister is only minded to continue to consider the release of valuable greenfield land for this purpose where he is convinced that:</p> <ul style="list-style-type: none"> <li>the sponsors of the site's development are willing and can demonstrate that they are able to develop the site for the creation of homes that contribute towards the Island's housing needs, as evidenced by the Housing Gateway and;</li> <li>it is demonstrated that there are no other viable development opportunities to meet the Parish's aspirations within the existing Built-up Area boundary.</li> </ul> <p>Policy H5 of the 2011 Island Plan already requires that evidence of need is demonstrated through the Housing Gateway. This does not preclude the occupation of any homes by parishioners or those with connections to the parish, but only where they qualify through the Housing Gateway operated by the Strategic Housing Unit.</p> <p>Policy H5 also requires that any proposals to rezone land outwith the BUA are set within the context of a Village Plan.</p>
IR(1) -130	Mr Paul Harding	BDK Architects	Neither	No comments on two sites (Field 622, St Ouen & Field 402, St Martin), but Objecting about Field 785, St. Ouen.	Comments noted.
IR(1) -89	A Achler		Objecting	yet another agricultural field being sacrificed for development!	See responses to IR(1) – 131 and - 177 above
IR(1) -202	A.J Belhomme		Objecting	<p>I understand members of the public have been given an opportunity of commenting upon certain proposed revisions to the 2011 Island Plan. I am grateful for that opportunity. My observations are limited to the proposed re-zoning of Field 402, St Martin, for affordable housing (Policy H5).</p> <p>By way of background I am the owner/occupier of 3, Le Jardin de la Reine, St Martin. Le Jardin de la Reine is a small development of six houses which adjoins (in part) Field 402 and adjacent woodland.</p> <p>In my view Field 402 is wholly unsuitable for development of the type envisaged. In addition, the proposed development is contrary to the context and setting of the site. Field 402 is surrounded on two sides by mature trees which to some extent shade the field. These would no doubt be felled if development was permitted. Additionally, the field is bordered by an area of attractive mature woodland which is not only part of the integral rural landscape of St Martin but also provides an essential green backdrop zone to the houses which form part of Le Jardin de la Reine. The woodland area houses a population of birds and (to the best of my knowledge) squirrels whose habitat would be devastated in the event of development (in particular because it is proposed access to the site would be from La Grande Route de Faldouet).</p>	<p>Comments noted.</p> <p>The site assessment at Appendix B of the Minister's proposed amendment acknowledges that the site contains and is screened by a number of mature trees and that the potential impact of the development of the site requires further consideration. Any adverse effect upon the site's ecological value may need to be mitigated or offset.</p>
				<p>Given the likely loss of trees on the site any new development would clearly be visible from some distance (in particular from the area of the Parish church).</p> <p>I have read the "Affordable Housing Site Assessment" relating to Field 402 and have the following specific observations: 1. Under the heading "Spatial Strategy" it is stated that the site is "adjacent to the village of St Martin". Insofar as there exists a "village of St Martin" the site cannot be said to be adjacent to it. Specifically, there is a much larger agricultural field which separates Field 402 from the area surrounding the Parish church. The proposed development therefore appears to run contrary to Policy H5; and 2.</p>	<p>The site is adjacent to the existing Built-up Area boundary, as set out in the 2011 Island Plan, that defines the extent of the settlement that is centred on the Parish Church.</p> <p>The impact of the development of this site upon the landscape character of the area is a material consideration in relation to both short and long views.</p>

Ref	Name	Agent/ Organisation	Supporting/ Objecting	Reasons for answer	Minister's Response
				The Assessment properly concedes that the loss of a 1.5 acre agricultural field is significant	The significance of this loss to agriculture has been raised with EMRE.
IR(1) -38	Amanda Lees-Baker		Objecting	I am against building on any actively farmed green zone fields.	See responses to IR(1) – 131 and - 177 above
IR(1) -65	Anonymous		Objecting	the high density of housing in the area already	The Minister does consider that the density of housing in the area is high..
				the impact on traffic	The existing road network has adequate capacity and adequate visibility can be achieved for vehicle entering onto the highway. The site is close to a frequent bus service.
				pressure on local resources such as schools	The current and future ability of local schools to accommodate anticipated demand for places is material and ESC has advised that there is capacity.
				the importance of maintaining green land - possibly for allotments	The Minister is only minded to continue to consider the release of valuable greenfield land for this purpose where he is convinced that: <ul style="list-style-type: none"> <li>the sponsors of the site's development are willing and can demonstrate that they are able to develop the site for the creation of homes that contribute towards the Island's housing needs, as evidenced by the Housing Gateway and;</li> <li>it is demonstrated that there are no other viable development opportunities to meet the Parish's aspirations within the existing Built-up Area boundary.</li> </ul>
IR(1) -39	Anonymous		Objecting	agricultural land	See responses to IR(1) – 131 and - 177 above
IR(1) -13	Anonymous		Objecting	Another inexplicable proposal, presumably the Parish "want it" and that is more than sufficient justification to propose it, After the 2011 Plan review this is beyond depressing.	See responses to IR(1) – 131 and - 177 above
IR(1) -4	Anonymous		Objecting	another open area built on there has already been an extension to maufant village enough is enough	See responses to IR(1) – 131 and - 177 above
IR(1) -7	Anonymous		Objecting	Yet another green space being filled in and a loss of wildlife habitat.	See responses to IR(1) – 131, 177 and - 202 above
IR(1) -45	J Le Main		Objecting	As with 622, this field does not appear to be an obvious choice unlike the glasshouse sites proposed.	See responses to IR(1) – 131 and - 177 above
IR(1) -90	Jayn Johnson		Objecting	See attached letter for full representation As the landowner, I was appalled at the proposal to rezone the site for 80% social rental homes and the rest as affordable housing and would not be willing to sell to anyone intending to do this. This is not what I want and it ignores the long standing plan by myself and the St Martin Housing Association to provide houses for first-time buyers from the Parish.	See responses to IR(1) – 131 and - 177 above
IR(1) -5	L & M Howard		Objecting	Please just leave the Green Zone alone and let the land be worked for food production. We have more than sufficient land available for building during the life of the 2011 Island Plan without continual attempts to eat away at the countryside.	See responses to IR(1) – 131 and - 177 above
IR(1) -176	Martin Whitley	La Comité du Commune Rurale St. Jean	Objecting	This is clear erosion of the green zone.	See responses to IR(1) – 131 and - 177 above
IR(1) -123	Mike Jackson		Objecting	It's a green field	See responses to IR(1) – 131 and - 177 above
IR(1) -8	Mr Bob Henkhuzens		Objecting	As per the earlier propositions, this is yet another outrageous plan to take yet another bite out of the rural environment ... most of the earlier comments apply...	See responses to IR(1) – 131 and - 177 above
IR(1) -67	Mr James Godfrey	Royal Jersey Agricultural &	Objecting	This is creeping development into the Green Zone.	See responses to IR(1) – 131 and - 177 above

Ref	Name	Agent/ Organisation	Supporting/ Objecting	Reasons for answer	Minister's Response
		Horticultural Society			
IR(1) -37	Mr Jason Lees-Baker		Objecting	<p>NE2.1 As a general rule any development on Green zone will adversely affect the natural environment whilst development on an agricultural field also damages the economy of the rural environment.</p> <p>NE2.7 Development of the Green Zone is in direct contravention of the Commitment the Island has made in relation to the Convention on Biological Diversity.</p> <p>NE2.9 The proposed development will potentially cause an adverse impact to the natural environment in respect of loss of fields and meadows; loss of trees and hedgerows; intrusion of building and materials; the pollution of water courses and damage to food chains.</p> <p>NE2.11 and ERE1 The rural economy strategy sets out to protect agricultural land and is opposed to the loss of good agricultural land. There is a presumption against the permanent loss of good agricultural land for development or other purposes.</p> <p>NE2.15 Public attitude has hardened against further development of housing on green field sites as set out in Imagine Jersey 2035 (gov.je) and the Island Plan Strategic Options Green Paper (consult. Gov.je). The proposed development in the green zone is directly opposed to such public opinion and thus Jersey political will. As demonstrated by the number of objectors to the proposal. (166).</p> <p>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 have an adverse impact on agriculture. I am not aware that an Environmental impact study has been commissioned. Without such a study will the Planning and Environment Minister and the Inspector be able to accurately determine the extent of adverse environmental impact?</p> <p>NE2.85 There is no benefit to the rural economy, either agriculture or tourism in exchange for the loss of agricultural land.</p>	See responses to IR(1) – 131 and - 177 above
IR(1) -15	Mrs Rosemary Evans		Objecting	It is using agricultural land	See responses to IR(1) – 131 and - 177 above
IR(1) -206	Paul Le Marrec		Objecting	<p>I object to the proposed rezoning of green zone land specifically Fields 622 and 785 in St Ouen and 402 in St. Martin.</p> <p>To rezone such land prior to the 2014 Housing Needs Survey is premature given the projected surplus of A and B category housing already identified for the period to 2020. In addition, an independent assessment of the demand for properties in the specific locations should be undertaken.</p>	<p>The Minister's proposed amendment which seeks to provide additional housing supply is based on the latest evidence of housing supply, demand and affordability provided by the 2012 Housing Needs Survey (undertaken as part of JASS); the Housing Affordability Report and the latest Residential Land Availability report: any response made in relation to this data is not considered to be premature and is required to be undertaken if the Island's housing needs are to be eased.</p>
				<p>Prior to any further loss of rural land alternative sites in the built up area should be considered; including the potential redevelopment of existing vacant (and potentially vacant) offices given the significant planned office developments currently in train at the Esplanade and other sites.</p>	<p>The thrust of the Spatial Strategy of the 2011 Island Plan remains unaltered by the Minister's proposed amendments such that most of the Island's development needs should be met from within the existing built-up area: the proposed rezoning of land would, in total, provide about 350 homes out of a total supply of over 3,500.</p> <p>Also see response to IR(1) – 131 about the need to demonstrate that no suitable land within the existing BUA cannot meet the need for this development.</p>
IR(1) -48	President Graham J Le Lay	JERSEY FARMERS' UNION	Objecting	<p>See Attached letter dated 10th September 2014 One of the main objectives of the Jersey Farmers' Union is to maintain a Policy of preserving agricultural land to ensure the continuance of a viable Agricultural / Horticultural Industry for the benefit of farmers and growers and the Island as a whole. There is currently a strong demand for agricultural land throughout the Island. This can be evidenced by all viable agricultural land, be it large areas or small pockets of land previously being uncultivated, now being utilised. All grades of land from prime agricultural land, secondary quality land, pastureland and meadowland can serve a purpose within the Industry; be it for the cultivation</p>	See responses to IR(1) – 131 and - 177 above

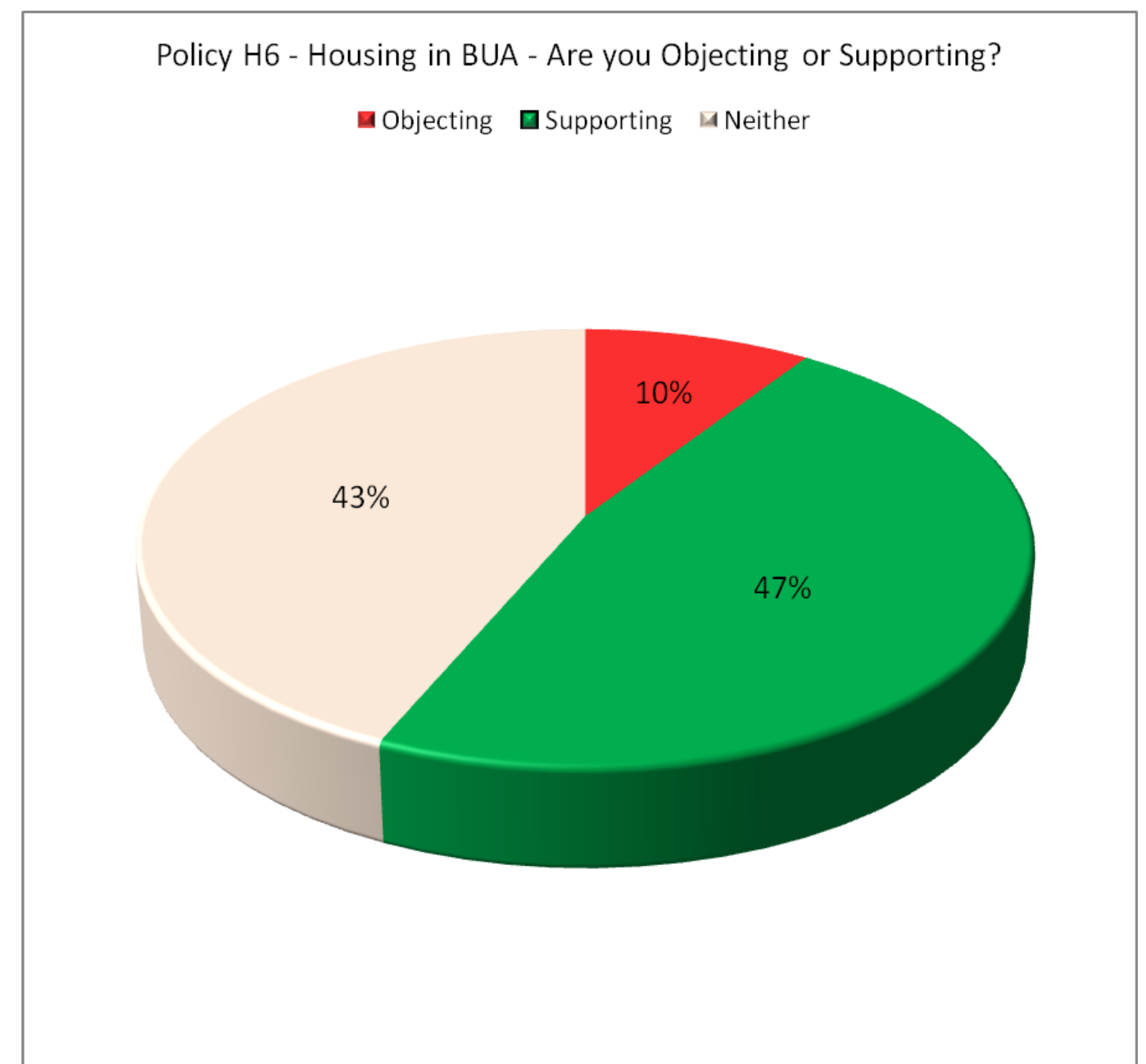
Ref	Name	Agent/ Organisation	Supporting/ Objecting	Reasons for answer	Minister's Response
				<p>of all crops to bovine grazing for the Dairy Industry.</p> <p>The supply of agricultural land is finite and this must be safeguarded. Farmers and growers are the guardians of the countryside and a viable Agricultural Industry is the most cost-effective way of managing the environment. The preservation and protection of agricultural land will encourage a sustainable and diverse Agricultural Industry and a vibrant Industry produces high quality produce and creates employment. A potential future world food shortage has been widely documented and should this materialise, the Industry will be required to help ensure the Island becomes as self-sufficient as possible.</p> <p>The Union would therefore like to object to Policy H5: Housing in Rural Centres - the re-zoning of the following sites to provide Category "A" affordable housing on the above-mentioned grounds and the fact that we feel there are sufficient brown field sites which can be utilised prior to any green field sites being taken.</p>	
IR(1) -114	Carlo Riva	The Association of Jersey Architects	Supporting	No comment	Comments noted.
IR(1) -25	Carlo Riva	Riva Architects Ltd	Supporting	No comment.	Comments noted.
IR(1) -49	Chris Lamy		Supporting	Perfect for social housing.	Comments noted.
IR(1) -17	Mr John Shenton		Supporting	This site would appear to meet the general criteria for affordable homes on a 80/20 split.	Comments noted.
IR(1) -32	Mr Michael Stein	MSPlanning Ltd	Supporting	In spite it being a green field site, the demand for affordable housing justifies its re-zoning	Comments noted.
IR(1) -23	Mr Peter Thorne		Supporting	A good use for an overgrown, former commercial site, and close to the village centre.	Comments noted.
IR(1) -26	Mrs Judy Martin	States Member (St. Helier No.1)	Supporting	hey need young people to buy in this parish and this could help	Comments noted.
IR(1) -121	Susie Pinel	States Member (St. Clement)		This area has been researched as Affordable/first time buyers/shared equity and should remain as such	Comments noted.

## Policy H6 - Housing in BUA

The Minister proposes amending paragraph 6.128 and adding an additional paragraph to policy H6 as follows: 6.128 For clarity, all residential development - including new buildings; conversions; refurbishment; extensions and alterations; and redevelopment - regardless of its location, **whether that be within the Built-up Area or in the countryside**, will also be required to provide an adequate standard of accommodation.

### Questionnaire consultation results

	% Total	% Answer	Count
<b>Number of responses</b>	24%	-	53
<b>Objecting</b>	2%	9%	5
<b>Supporting</b>	11%	47%	25
<b>Neither</b>	11%	43%	23
<b>[No response]</b>	76%	-	166
<b>Total</b>	<b>100%</b>	<b>100%</b>	<b>219</b>





## Policy H6 - Housing in BUA - comments

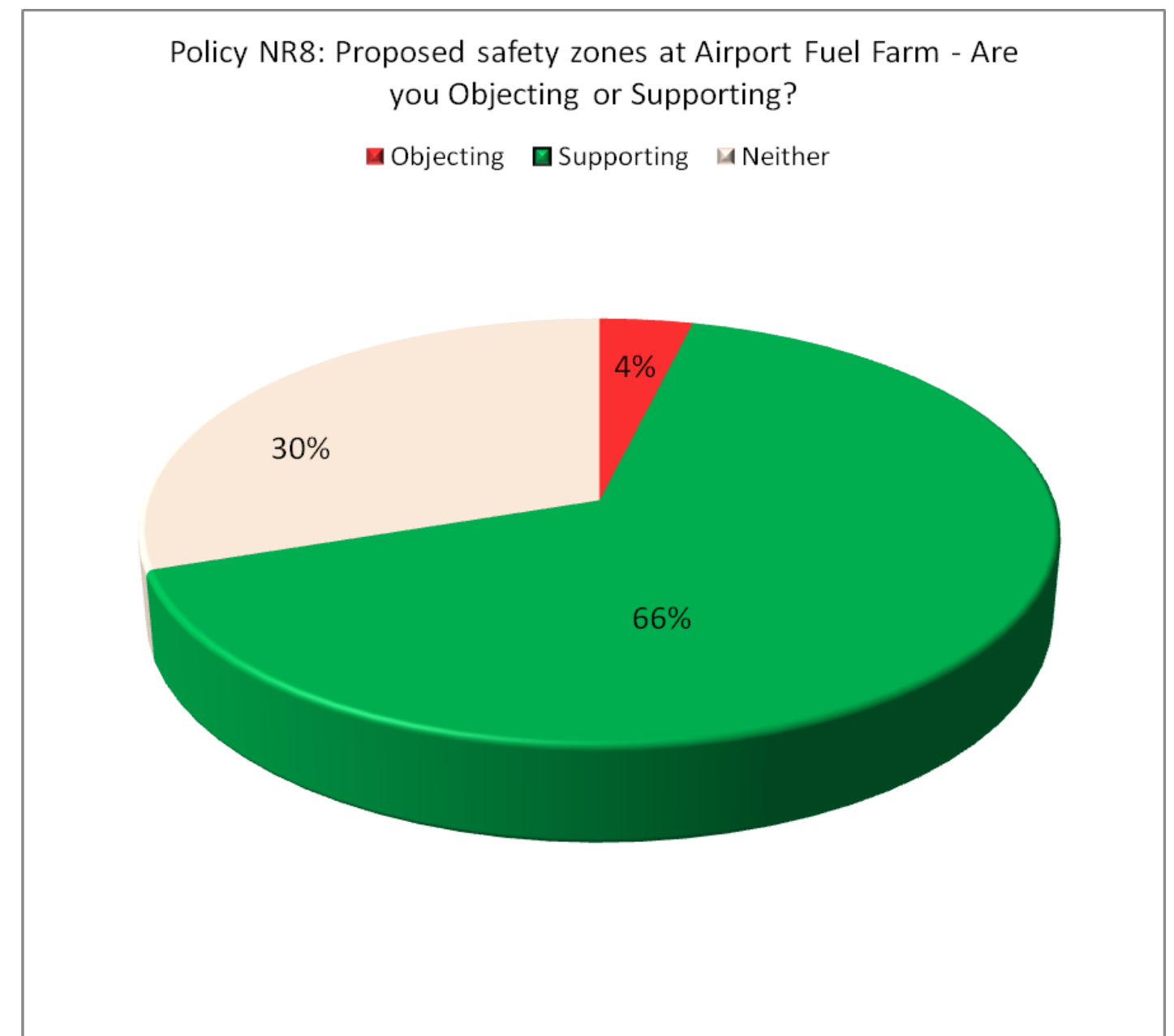
Ref	Name	Agent/ Organisation	Supporting/ Objecting	Reasons for answer	Minister's Response
IR(1) -177	Deputy John Le Fondré	States Member (St.Lawrence)	Neither	The amendment I brought to the Island Plan which is incorporated into para 6.149 (now to be 6.129), in respect of internal space standards and noise / sound insulation was well received by the States Assembly. It is my strong view that if one is to build higher (and thereby protect the countryside) this can be made far more acceptable if one keeps emphasising the importance of good (and preferably better) internal spatial standards and good sound / noise insulation standards.	Comments noted. The Minister is actively working to bring forward supplementary planning guidance to review space standards for residential development. Sound and noise insulation standards cannot be regulated by supplementary planning guidance and are regulated through Building Bye-Laws, which were last amended in 2004 in relation to sound insulation and accord with standards operated in the UK.
IR(1) -8	Mr Bob Henkhuzens		Objecting	Offering support to the proposed changes, implies that further building in the countryside is acceptable....	This amendment seeks to clarify that all residential development is carried out to minimum standards wherever it occurs in the Island.
IR(1) -13	Anonymous		Supporting	These seem sensible revisions	Comments noted
IR(1) -114	Carlo Riva	The Association of Jersey Architects	Supporting	No comment	Comments noted
IR(1) -25	Carlo Riva	Riva Architects Ltd	Supporting	No comment.	Comments noted
IR(1) -49	Chris Lamy		Supporting	Seems sensible.	Comments noted
IR(1) -5	L & M Howard		Supporting	This seems sensible and the most efficient use of the Built-Up area can only be a good thing.	Comments noted
IR(1) -17	Mr John Shenton		Supporting	Cosmetic change to the wording the planning laws should ensure that this is the case in all developments.	Comments noted
IR(1) -130	Mr Paul Harding	BDK Architects	Supporting	Supporting Policy H6 amendment as written.	Comments noted
IR(1) -23	Mr Peter Thorne		Supporting	Little significance between this and the original wording.	Comments noted, however the amended wording seeks to clarify that all residential development is carried out to minimum standards wherever it occurs in the Island.
IR(1) -15	Mrs Rosemary Evans		Supporting	Further thought should be given to adequate floor space and storage	Comments noted. The Minister is actively working to bring forward supplementary planning guidance to review space standards for residential development which will address issues of floorspace and storage..
IR(1) -100	Mrs Stephanie Steedman		Supporting	If this is proposed, why do the controls in the Green Zone need to be more onerous - lifetime homes standards?	This amendment seeks to clarify that all residential development is carried out to minimum standards wherever it occurs in the Island.

## Policy NR8: Proposed safety zones at Airport Fuel Farm

Since the adoption of the 2011 Island Plan the risks posed to development from one of the Island's hazardous installations at the Jersey Gas site in the north of town has changed and new information about the extent of risk has become available at the Airport Fuel Farm. Because of this, the Minister proposes to amend Policy NR8: Safety Zones for hazardous installations and the Proposals Map, to reflect the current situation.

### Questionnaire consultation results

	% Total	% Answer	Count
<b>Number of responses</b>	24%	-	53
<b>Objecting</b>	1%	4%	2
<b>Supporting</b>	16%	66%	35
<b>Neither</b>	7%	30%	16
<b>[No response]</b>	76%	-	166
<b>Total</b>	<b>100%</b>	<b>100%</b>	<b>219</b>



## Policy NR8: Proposed safety zones at Airport Fuel Farm - Comments

Ref	Name	Agent/ Organisation	Supporting/ Objecting	Reasons for answer	Minister's Response
IR(1) -138	Deputy John Young		Neither	<p>I have approached the Airport management whom own the public land identified in 9.1 which is surplus to their immediate operational need as it was recently subject to an application , supported by the airport , for use by go - karts. This application was withdrawn.</p> <p>I have since requested part of this land which is now in the proposed zone be released for use as Allotments which are much needed. P 71/2013 refers; this will assist the parish greatly as there is a backlog of need. Although the site is sandy, I am advised by JALGA experts that it is very suitable for this use. The site is within the built up area thus avoiding the need for car parking on site. The only objection I have received from the Airport management is that they do not wish to see any use which encourages birds.</p> <p>I think it likely that allotment holders will agree and discourage birds using devices such as scarecrows etc.</p>	<p>Comment noted.</p> <p>Any proposed use for this land will be considered against current planning policy. The exposure to risk posed by the proximity to the hazardous installation and evidenced in the associated report will be material to determination notwithstanding any proposed change to the Island Plan policy.</p>
IR(1) -165	Mr Bob McAllister		Objecting	<p>I would like to comment on the proposed imposition of a blast zone around the Airport Fuel Farm and the impact this will have on properties that fall within.</p> <p>My property: Laburnum Farm &amp; Field 282- borders the Airport Fuel Farm and when built we were reassured in writing by the airport and Fire Safety Officer that the safety measures put in place were more than adequate and that there were no safety concerns. Although the usage of the site has not significantly altered, the thinking regarding safety does appear to have had a significant rethink.</p> <p>As such in the first instance I feel the onus should be on the airport to mitigate this new risk profile, by either relocation the fuel farm or implementing anti blast walls. Adoption of the proposed blast zone will potentially impact on land usage permissions and property value.</p> <p>As such I feel an amendment to the policy NR 8 is needed, requiring the owner of the Airport 'Hazardous installation', to compensate affected properties that predate the fuel farm, for loss of value the imposition of this new blast zone may result in.</p>	<p>The airport fuel farm safety zone has been reassessed following the Buncefield incident in the UK.</p> <p>It is important to note that the hazard safety zones do not prohibit all forms of development but rather seeks to ensure that any development does not lead to an intensification of use and/or an increase in the number of people on the site that are exposed to risk.</p> <p>Any issues of compensation and/or mitigation posed by the existing facility is a matter to be addressed by the operator. These comments will be referred to the Ports of Jersey.</p>
IR(1) -13	Anonymous		Supporting	I am surprised that the safety zones are so limited but presumably the technical aspects have been fully reviewed before proposing this.	Noted
IR(1) -114	Carlo Riva	The Association of Jersey Architects	Supporting	We do voice concern about the proposed amendment relating to the Airport Fuel Farm however. Alternatives should be considered at this location to mitigate the risk of neighbours whose presence pre-dates the establishment of the Fuel Farm.	<p>Noted.</p> <p>Any issues of compensation and/or mitigation posed by the existing facility is a matter to be addressed by the operator. These comments will be referred to the Ports of Jersey.</p>
IR(1) -25	Carlo Riva	Riva Architects Ltd	Supporting	No comment.	Noted
IR(1) -83	Celia Scott-Warren		Supporting	New information regarding necessary safety zones should not be ignored.	Noted
IR(1) -49	Chris Lamy		Supporting	Very sensible.	Noted
IR(1) -176	Martin Whitley	La Comité du Commune Rurale St. Jean	Supporting	Consideration should be given to the Kosangas Safety zone in St John.	<p>The Les Ruettes LPG storage site at St John is identified at Policy NR8: Safety Zones for hazardous installations. Proposal 27 of the 2011 Island Plan states that safety zones will be reviewed and new zones defined during the Plan period.</p> <p>Jersey Gas have been actively considering the potential relocation of this facility which would remove the hazard.</p>
IR(1) -17	Mr John Shenton		Supporting	No comment - seems obvious.	Noted.
IR(1) -130	Mr Paul	BDK	Supporting	Generally Supporting removal of Gas Holder, Tunnel Street once decommissioned,	Since the adopted plan, the airport has carried out a hazard review of its fuel farm

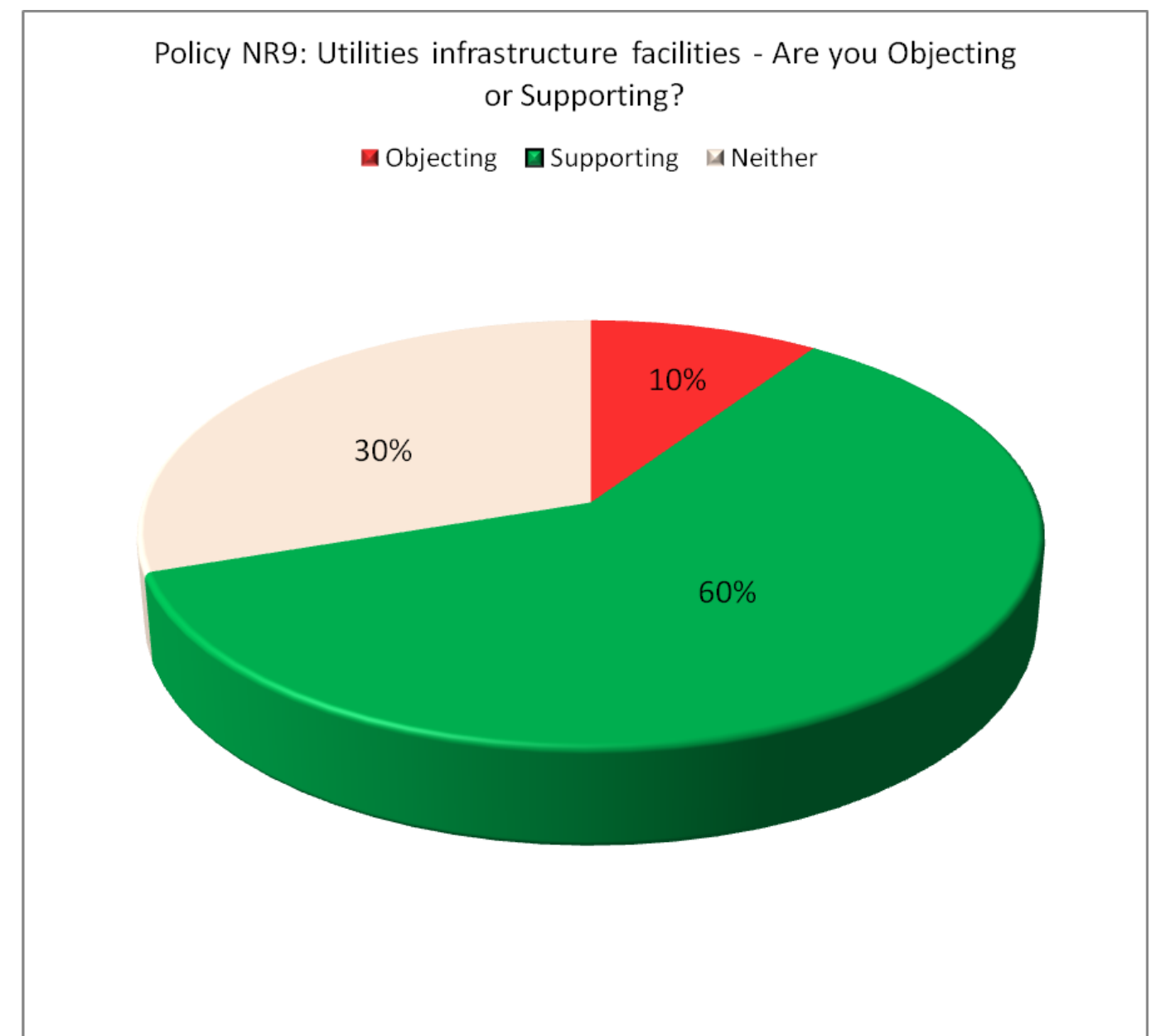
Ref	Name	Agent/ Organisation	Supporting/ Objecting	Reasons for answer	Minister's Response
	Harding	Architects		<p>but Objecting to the proposed amendment relating to Airport Fuel Farm for which no justification is provided, for the following reasons:-</p> <p>The Accompanying IPR1 Questionnaire accompanying the 2011 Island Plan: Interim Review consultation draft suggests that " The proposed revision to this policy and its reasoned justification, together with the site assessment, is set out in the 2011 Island Plan: interim review - Proposed revision Draft for consultation (July 2013). " In fact there is no reasoned justification nor site assessment provided in the 2011 Island Plan: Interim Review consultation draft, merely a Plan referenced " Picture 9.1 Airport Safety Zones for Hazardous Installations " which throws a cordon around privately owned properties to the west of the Airport Fuel Farm accompanied by Footnote 10 referencing " Jersey Airport Review of Fuel Farm Safety Zones 2011 Atkins ".</p> <p>We have requested this from Planning whom were unable to provide this report, instead supplying a copy of HSE's methodology 'PADHI' (Planning Advice for Developments near Hazardous Installations) which is intensely confusing and not directly connected to any specific assessment of the Airport Fuel Farm.</p> <p>The private properties that would be affected by the proposed cordon around them predate the relatively recent establishment of the Airport Fuel Farm. We are led to believe by a resident when this occurred the private property owners were given assurances by the Fire Service / Airport there as no risk of explosion and their properties would be unaffected by the Fuel Farm. It seems a breach of natural justice &amp; human rights to now impose such a cordon severely restricting private property rights, instead of requiring the Airport to install mitigating measures such as blast walls &amp; automatic fire extinguishment systems eg sprinklers.</p>	<p>safety zones (the same review process was carried out for La Collette Fuel Farm). In addition, the Fire department are working with Jersey Gas on the gas works site to gradually remove the risk from that site entirely and this should be completed next year.</p> <p>The hazard safety zones have been determined by Risk Management Consultants Atkins who work in conjunction with the UK Health and Safety Executive (HSE). Once the zones are established, they are interpreted using the HSE's methodology 'PADHI' (Planning Advice for Developments near Hazardous Installations). Both documents are in the public domain.</p> <p>It is important to note that the hazard safety zones do not prohibit all forms of development but rather seeks to ensure that any development does not lead to an intensification of use and/or an increase in the number of people on the site that are exposed to risk.</p> <p>Any issues of compensation and/or mitigation posed by the existing facility is a matter to be addressed by the operator. These comments will be referred to the Ports of Jersey.</p>
IR(1) -23	Mr Peter Thorne		Supporting	For safety reasons.	Noted
IR(1) -15	Mrs Rosemary Evans		Supporting	anything to provide greater safety	Noted

## Policy NR9: Utilities infrastructure facilities

The Minister for Planning and Environment proposes to amend Policy NR9: **Development that seeks to extend, alter or intensify the use of existing utility infrastructure facilities in the Green Zone or the Coastal National Park will need to demonstrate that; the need for development is proven; alternatives to meeting the need have been properly identified and considered; and that the environmental implications are properly identified, avoided and/or mitigated as far as possible**

### Questionnaire consultation results

	% Total	% Answer	Count
Number of responses	24%	-	53
Objecting	2%	9%	5
Supporting	15%	60%	32
Neither	7%	30%	16
[No response]	76%	-	166
Total	100%	100%	219





**Policy NR9: Utilities infrastructure facilities - comments**

Ref	Name	Agent/ Organisation	Supporting/ Objecting	Reasons for answer	Minister's Response
IR(1) -114	Carlo Riva	The Association of Jersey Architects	Objecting	Consideration should possibly be given to re-zone the Utility depots within the Green Zone to reduce the hurdles needed to be overcome to allow the Utility companies to optimise and adequately resource these Island assets.	The proposed amendments to both Policy NE6 and Policy NE7 seek to recognise the potential requirement for strategic development of utilities infrastructure within the GZ and the CNP, subject to tests.
IR(1) -25	Carlo Riva	Riva Architects Ltd	Objecting	Consideration should possibly be given to re-zone the Utility depots within the Green Zone to reduce the hurdles needed to be overcome to allow the Utility companies to optimise and adequately resource these Island assets.	The proposed amendments to both Policy NE6 and Policy NE7 seek to recognise the potential requirement for strategic development of utilities infrastructure within the GZ and the CNP, subject to tests.
IR(1) -181	Vivien Vibert		Objecting	The "need to demonstrate that; the need for development is proven; alternatives to meeting the need have been properly identified and considered" is not adequate protection for the CNP and Green Zone. There should be a need to demonstrate that the infrastructure is a) essential to Island life, b) that it is the only way of supplying whatever it does, and c) there is no alternative site in the Built Up Area. Further reservoirs should be avoided and alternatives such as water restrictions, raising the cost of water according to amount used, recycling grey water for toilet flushing.	Exploration of potential alternatives, including 'do nothing', will have had to have been properly researched and evidenced as part of an EIA process in relation to proposals for the provision of strategic infrastructure in the GZ and CNP.
IR(1) -4	Anonymous		Supporting	fully agree	Comment noted.
IR(1) -49	Chris Lamy		Supporting	We cannot but help support the utilities but in a sympathetic approach to the environment.	Comment noted.
IR(1) -162	Ian Taylor	Jersey Chamber of Commerce	Supporting	It is a future safeguard to make provision allowing for the possible extension of Val de la Mare reservoir as an exception to the Coastal National Park policy.	Comment noted.
IR(1) -134	Jeremy Snowden		Supporting	The need to permit such developments is well made and logical.	Comment noted.
IR(1) -17	Mr John Shenton		Supporting	No comment - seems obvious	Comment noted.
IR(1) -130	Mr Paul Harding	BDK Architects	Supporting	Supporting Policy NR9 amendment as written.	Comment noted.
IR(1) -15	Mrs Rosemary Evans		Supporting	It sounds sensible	Comment noted.
IR(1) -161	Mr Howard Snowden	Jersey Water	Supporting	Jersey Water welcome the Minister's proposed changes to Policy NE6 (and by consequence NR9) specifically the 'explicit recognition that some strategic development may be required in the Coastal National Park'. In doing so Jersey Water does recognise that any future application to increase the capacity of Val de la Mare Reservoir would need to be justified operationally and environmentally. With regard to Policy NR9, it is recommended that para 9.72 is amended to remove the statement 'by raising the height of the dam by 9m and the company continues to investigate this option'. Jersey Water would be required by policies NE6 and NR9 to explore all possibilities and the Company would need in the near future to re-visit all possible engineering solutions based on contemporary practices and data. This may show that raising the dam by 9m is not the most suitable solution and therefore such a specific course of action does not seem appropriate within the more generalised statements of Policy NR9 and the pre-amble. It is therefore requested the Minister alter para. 9.72 to state It is possible that during the remainder of the Plan period, there will be a requirement to increase the storage and supply of water resources to meet the Island's needs. Jersey Water has previously stated that the most likely means by which this could be achieved would be to increase the storage capacity of Val de la Mare Reservoir. The company continues to investigate all engineering options available.	Support noted. The Minister is minded to support the amendment of para. 9.72 as proposed.

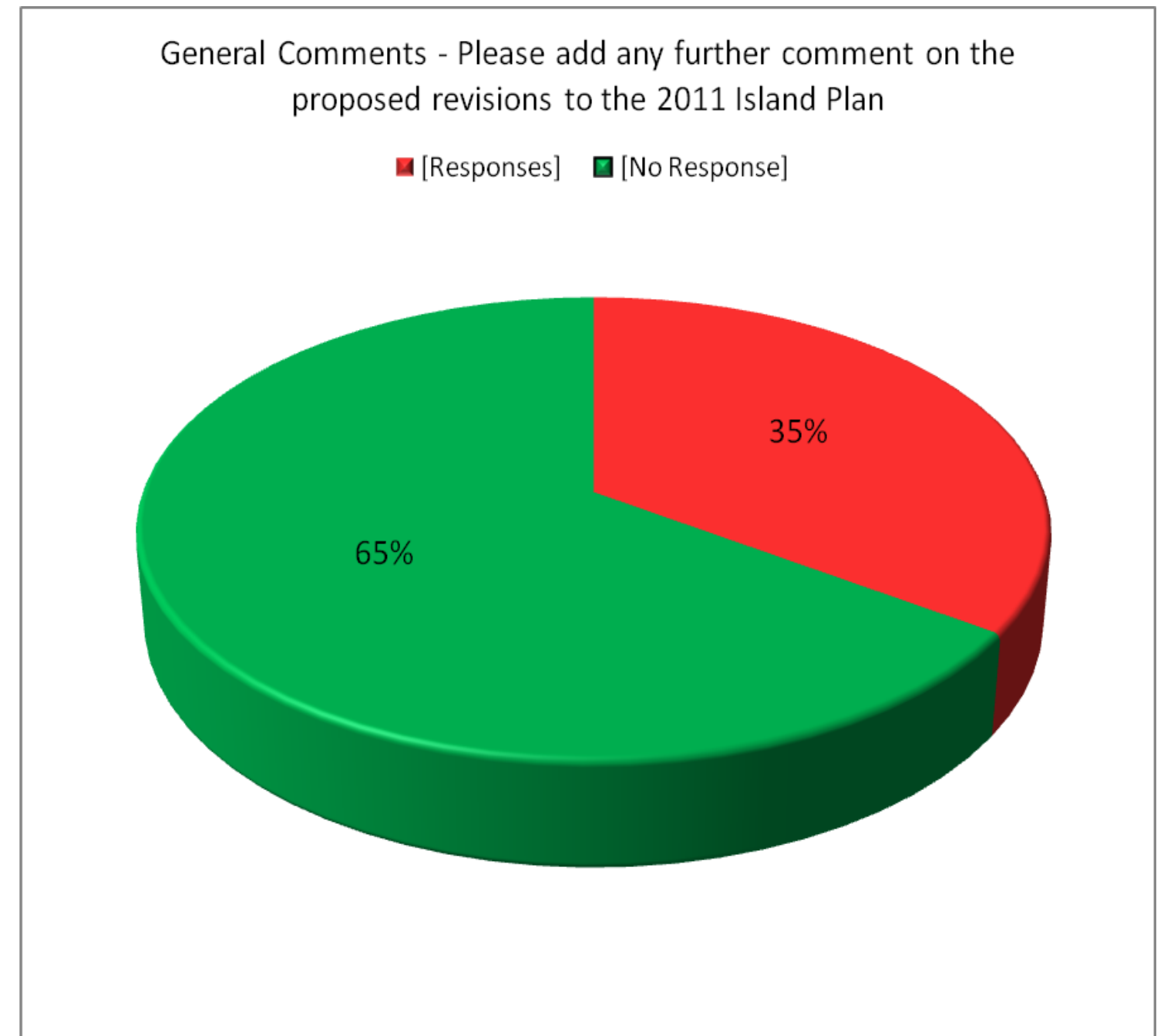
Ref	Name	Agent/ Organisation	Supporting/ Objecting	Reasons for answer	Minister's Response
				The reservoir is located within the Coastal National Park where there is a presumption against development. Should the option of extending the reservoir be pursued there will be a requirement to demonstrate that it meets a proven need that serves the Island's interests, relative to a proper assessment of alternative options of meeting that need, whilst seeking to mitigate the environmental implications as far as possible.	

## General comments

The Minister for Planning and Environment has received a number of general comments about the 2011 Island Plan.

### Questionnaire consultation results

	% Total	Count
Number of responses	35%	76
Responses	35%	76
No response	65%	143
Total	100%	219



Ref	Name	Agent/ Organisation	Reasons for answer	Minister's Response
IR(1) -13	Anonymous		I am extremely disappointed that this review was launched at all. I believe that the general public deserve some time and space after each revision of the Island Plan has been approved by the States and it is less than 2 years ago that the States spent many days debating the current Plan.	<p>The Minister is not seeking to amend the entire Plan and is only proposing change where it is considered necessary.</p> <p>Of 140 polices in the current Plan, 11 are proposed for revision at this time, six of which are related to the matter of housing. Most importantly, the strategic framework for the existing Plan remains unchanged, and the proposed revisions are, in the view of the Minister, entirely consistent with this framework.</p> <p>The main driver for change is the need for affordable homes in the Island. One of the policy mechanisms that was approved by the States in June 2011 to deliver affordable homes – Policy H3 – has not been implemented. The Plan, as it currently stands, is thus unable to fulfil the objective of meeting this need and, as a consequence, new policies are needed to address the anticipated shortfall.</p> <p>In addition to this, the Island's housing situation has changed since 2011 and the Minister is seeking to ensure that the planning system responds to the latest information about housing needs and affordability.</p> <p>In bringing these proposed changes forward, the Minister is responding to a clear need and is supported by the Minister for Housing and other ministers in so doing.</p>
			There is also a danger of a less than full engagement by the public due to "consultation fatigue" and a sense that the revisions (especially in the Green Zone) are basically a done deal and should be approved because the Constables want them.	<p>The comment about consultation fatigue is note: the level of response, from over 200 people, would suggest that people are willing and able to be engaged in considering important changes to the Island Plan, for which the Minister is grateful.</p> <p>The Minister's proposed changes will be subject to similar levels of scrutiny to the original 2011 Island Plan, as prescribed by law. This will involve public consultation and an examination in public, conducted by independent planning inspectors, before the matter is considered by the States Assembly.</p> <p>The release of this greenfield sites around rural settlements for residential development as sponsored by the parishes remain to be the subject of consideration through this review process. The Minister for Planning and Environment is concerned to ensure that residential development here contributes towards the Island's need for affordable homes and the Minister is only minded to continue to consider the release of valuable greenfield land for this purpose where he is convinced that:</p> <ul style="list-style-type: none"> <li>the sponsors of the site's development are willing and can demonstrate that they are able to develop the site for the creation of homes that contribute towards the Island's housing needs, as evidenced by the Housing Gateway and;</li> <li>it is demonstrated that there are no other viable development opportunities to meet the Parish's aspirations within the existing Built-up Area boundary.</li> </ul>
			The 2011 zonings should be respected for the lifetime of the Plan but I do commend the department for some of the other tightenings in terms of definitions.	The basis for proposed revision is set out above.
IR(1) -16	Anonymous		Inevitable.	Comment noted.
IR(1) -10	Anonymous		Once a full count of all housing for sale empty and for rent has been made the powers need to have all the facts and figures so as to make a reasonable answer	<p>One in fourteen private dwellings (7%) were vacant at the time of the 2011 Census in Jersey (cf. 6% in 2001). Although there was no requirement for householders to give reasons for properties being vacant, some reasons were provided for around half of properties listed as vacant.</p> <p>Over a quarter (29%) were vacant due to being between tenants, and nearly a quarter (23%) were second or holiday homes. Around one in five were in the process of being built or renovated.</p> <p>On this basis, together with the fact that not all of these homes are suitable for affordable housing needs, the potential available vacant stock of housing could not be viably used to meet the current affordable housing shortage.</p>
			But I still think using green zone fields for housing is not the best way forward on a island with limited agri land and food shortages in the future is more a definite than a maybe	<p>The Minister acknowledges the importance of protecting the countryside and has sought to identify those sites which have already been subject to some form of development, albeit for agricultural purposes, on the edge of the existing built-up area as having the potential to contribute to the Island's housing needs.</p> <p>The release of this greenfield sites around rural settlements for residential development as sponsored by the parishes remain to be the subject of consideration through this review process. The Minister for Planning and Environment is concerned to ensure that residential development here contributes towards the Island's need for affordable homes and the Minister is only minded to continue to consider the release of valuable greenfield land for this purpose where he is convinced that:</p> <ul style="list-style-type: none"> <li>the sponsors of the site's development are willing and can demonstrate that they are able to develop the site for the creation of homes that contribute towards the Island's housing needs, as evidenced by the</li> </ul>

Ref	Name	Agent/ Organisation	Reasons for answer	Minister's Response
				<p>Housing Gateway and;</p> <ul style="list-style-type: none"> <li>it is demonstrated that there are no other viable development opportunities to meet the Parish's aspirations within the existing Built-up Area boundary.</li> </ul>
IR(1) -6	Anonymous		<p>Planning policy, as envisaged by the Island Plan, needs more brownfield development but the Planners aren't delivering - so a change in mind set is needed, including height of buildings.</p> <p>Other than Affordable homes no development on Green filed sites</p>	<p>Comments noted.</p> <p>All but two of the proposed sites for affordable housing are on previously developed or brownfield land and these sites together with the existing policies in the plan of concentrating development in the built up areas and increasing density in town should help meet future affordable housing needs and help protect green fields.</p>
IR(1) -229	Anonymous		<p>The island plan cost millions to produce and you idiots are going to tear it up and start again a few years later</p> <p>1. You are continuing to grovel to the evil developers you have allowed into the island - Dandara for example - how can they continue to build - like the hideous flats at Portelet most of which appear to be unsold - where is the money coming from??</p>	<p>The Minister is not seeking to amend the entire Plan and is only proposing change where it is considered necessary.</p> <p>Of 140 polices in the current Plan, 11 are proposed for revision at this time, six of which are related to the matter of housing. Most importantly, the strategic framework for the existing Plan remains unchanged, and the proposed revisions are, in the view of the Minister, entirely consistent with this framework.</p>
			<p>2. The government appears to be incapable of saying 'no' - where is the demand for the 'financial quarter' ?? not only will this continue to add to the uglification of St Helier doubtless the developer will be allowed to import thousands more workers prepared to work for the minimum wage with the promise of welfare hand outs after 5 years. TOTAL MADNESS</p> <p>3. Where is the demand for all this building - if the States start borrowing for this the island will be bankrupted. It appears to be another wheeze to keep highly paid civil servants (Jersey Development Company) in their jobs</p> <p>WHAT NEEDS TO BE DONE</p> <p>1 Reform the welfare system - Shut the door to all immigration - all you are allowing currently is the importation of more poverty - minimum wage jobs and people with babies - stop paying welfare after 5 years</p> <p>Stop giving people housing because they have produced babies</p> <p>Stop giving welfare to teenagers who will not work I can see nothing but a disaster over the coming years THE GOVERNMENT HAVE BETRAYED THE PEOPLE OF JERSEY WITH YOUR TREATMENT OF DEVELOPERS AND MASS IMMIGRATION</p>	<p>The main driver for change is the need for affordable homes in the Island. One of the policy mechanisms that was approved by the States in June 2011 to deliver affordable homes – Policy H3 – has not been implemented. The Plan, as it currently stands, is thus unable to fulfil the objective of meeting this need and, as a consequence, new policies are needed to address the anticipated shortfall.</p> <p>In addition to this, the Island's housing situation has changed since 2011 and the Minister is seeking to ensure that the planning system responds to the latest information about housing needs and affordability.</p> <p>In bringing these proposed changes forward, the Minister is responding to a clear need and is supported by the Minister for Housing and other ministers in so doing.</p> <p>The Island Plan simply seeks to respond to the direction provided by the States Strategic Plan and does not determine policy related to population and immigration.</p> <p>The reform of the welfare system is not a planning issue and is outside the remit of the Minister for Planning and Environment and the scope of this interim review.</p>
IR(1) -108	Anonymous		<p>The purpose of the Island plan is that it should last for 10 years. Amending the Island plan after such a short time undermines the whole purpose of the Island plan and will lose public trust and confidence in the Island Plan. If the Island plan can be amended at any time, I believe it's value and long term objectives are eroded. This is purely reactionary and short-sighted.</p> <p>Our Green spaces are slowly being eroded, and without drastic policy changes to control the population, future Island plans will have to re-zone more and more green spaces which will seriously damage Jersey as a nice place to live.</p> <p>Focus should be put on using existing housing stock (3,000 vacant properties recorded in the census). Incentives could be given to encourage households to downsize, freeing up family homes. Monetary incentives/grants could be given to landlords to rent private property as social housing.</p> <p>Population must be controlled first, before we build on our Green spaces</p>	<p>The Minister is not seeking to amend the entire Plan and is only proposing change where it is considered necessary.</p> <p>Of 140 polices in the current Plan, 11 are proposed for revision at this time, six of which are related to the matter of housing. Most importantly, the strategic framework for the existing Plan remains unchanged, and the proposed revisions are, in the view of the Minister, entirely consistent with this framework.</p> <p>The main driver for change is the need for affordable homes in the Island. One of the policy mechanisms that was approved by the States in June 2011 to deliver affordable homes – Policy H3 – has not been implemented. The Plan, as it currently stands, is thus unable to fulfil the objective of meeting this need and, as a consequence, new policies are needed to address the anticipated shortfall.</p> <p>In addition to this, the Island's housing situation has changed since 2011 and the Minister is seeking to ensure that the planning system responds to the latest information about housing needs and affordability.</p> <p>In bringing these proposed changes forward, the Minister is responding to a clear need and is supported by the Minister for Housing and other ministers in so doing.</p> <p>The Island Plan simply seeks to respond to the direction provided by the States Strategic Plan and does not determine policy related to population and immigration.</p> <p>One in fourteen private dwellings (7%) were vacant at the time of the 2011 Census in Jersey (cf. 6% in 2001). Although there was no requirement for householders to give reasons for properties being vacant, some reasons were provided for around half of properties listed as vacant.</p> <p>Over a quarter (29%) were vacant due to being between tenants, and nearly a quarter (23%) were second or holiday homes. Around one in five were in the process of being built or renovated.</p> <p>On this basis, together with the fact that not all of these homes are suitable for affordable housing needs, the</p>



Ref	Name	Agent/ Organisation	Reasons for answer	Minister's Response
				potential available vacant stock of housing could not be viably used to meet the current affordable housing shortage.
IR(1) -7	Anonymous		There has been no mention of the impact on the utilities of the Island. We are already struggling with the treatment of sewage and water, rubbish, health services, schooling. Surely better to invest in these first before building any more houses.	The impact of proposed new residential development upon local infrastructure is considered as part of the site assessments for each location (see detailed site assessments at appendix B)
IR(1) -24	Anonymous		You need to stick to parishes that are not built up too much like St Ouen and some of St Martin. However, please look at existing old premises that could be knocked down and built on instead of our green fields. Jersey will soon become an eye saw like castle quay....	Any new housing sites should support the strategic objectives of the plan, determined by the spatial strategy at Policy SP1 which seeks to focus development on the existing settlement pattern in the Island. This is where the majority of services, amenities and infrastructure is located and can best contribute to the development of the most sustainable pattern of development in the Island. The thrust of the Spatial Strategy of the 2011 Island Plan remains unaltered by the Minister's proposed amendments such that most of the Island's development needs should be met from within the existing built-up area: this will involve redeveloping already developed areas of the Island to regenerate them and to deliver the homes that the Island needs without further significant loss of greenfield land.
IR(1) -114	Carlo Riva	The Association of Jersey Architects	Certain sections, in particular the section for the Natural Environment, are overly long-winded and should be simplified to make them more accessible.	The policies and the pre-amble to them have been broken down to deal with specific forms of development that might be permissible in the CNP and GZ in an attempt to clearly explain the policy framework that will be applied to a comprehensive range of development types: hence the repetitious nature of the policy. A more concise policy could be adopted but this, it is considered, would lack the necessary clarity and specificity.
			We note the States Assembly supported P.71/2013 requesting you to review the following Policies which have not been addressed in this Interim Review:- ERE7 Derelict and Redundant Glasshouses; SP5 Economic Growth and Diversification; E1 Protection of Employment land; SP1 Spatial Strategy, for settlements outside the main built-up area; GD3 Density of Development; SCO6 Allotments; GD8 Percentage for Art. We appreciate review of these Policies may not have been feasible in the available time period, but would urge you to bring forward a further review of these Policies at the earliest possible moment.	The Minister is required, under the auspices of P.71/2013, to determine whether other parts of the Plan require revision and will report his findings on this matter as soon as he is in a position to do so. Any proposal to further revise the Plan will require a sound and convincing justification.
IR(1) -25	Carlo Riva	Riva Architects Ltd	Certain sections, in particular the section for the Natural Environment, are overly long-winded and should be simplified to make them more accessible.	The policies and the pre-amble to them have been broken down to deal with specific forms of development that might be permissible in the CNP and GZ in an attempt to clearly explain the policy framework that will be applied to a comprehensive range of development types: hence the repetitious nature of the policy. A more concise policy could be adopted but this, it is considered, would lack the necessary clarity and specificity.
IR(1) -83	Celia Scott-Warren		A huge amount of work was undertaken before the 2011 Island Plan was endorsed by States members. Extreme care and consideration needs to be given to each of the proposed changes. Jersey is a small Island and maintaining adequate protection of the Green Zone and Coastal National Park is essential.	Comments noted. See comments on proposed change to NE6 and NE7.
IR(1) -186	Chris Whitworth		As Planning and Environment are the only department which can rezone land in Jersey - it makes much more sense if only land under States ownership is in future rezoned for development.	The use of existing States land to help meet the need for affordable homes is a key part of the Minister's proposed amendment to the Plan.
			This would involve the states purchasing earmarked Green Zone land at a fair price (much nearer to its agricultural value) from the landowner before rezoning is possible. If only states owned/purchased land could be rezoned it would, at a stroke reduce building costs and allow a better quality of home to be constructed for the same price. This would also have the benefit of stopping landowner's from purposely allowing areas to fall into disrepair and would keep more agricultural land in use, as only those seriously wanting to leave the industry would sell. This concept would also fit in with the recent calls for only states land to be developed and would give those with no other use for their land a purchaser in the States of	The purchase of land is not a planning policy matter and is outside the scope of the interim review.

Ref	Name	Agent/ Organisation	Reasons for answer	Minister's Response
			<p>Jersey.</p> <p>The Strategic Reserve Fund could be used to build up a states land bank, (more sensible than cash reserves these days), which could not only be used for future developments, but also for land swaps with more sensitive areas of the island.</p>	
IR(1) -171	Deputy Roy Le Herissier	States Member (St. Saviour No.3); Planning Application Panel member	<p>I am disappointed that no mention is made in this review of the employability policy whereby owners taking "economically viable " sites out of the economy are asked to provide employment alternatives when buildings are often in a state of dereliction or, for other reasons, are beyond economical use.</p> <p>I appreciate that owners should not be allowed to deliberately run down sites for development, but the current tests sometimes simply do not make sense.</p>	<p>Policy E1 and the supporting guidance, is to be reviewed by the Minister in accord with P.71/2013. The findings of this work will determine whether further review of Island Plan policies are required.</p> <p>Policy E1 is an important policy within the 2011 Island Plan as it ensures that the supply of employment land is retained, where relevant to do so. It does not preclude land and buildings being taken out of employment use: it just requires applicants to demonstrate that the site is no longer required for employment use.</p> <p>Being a test based policy, it has proven to be flexible, with some sites being retained and providing much needed additional employment opportunities on the Island (e.g. Iceland, St. Peter), whilst allowing other more unsuitable sites to be released for other uses such as housing (e.g. Les Sapins Glasshouses, Boulivot).</p>
IR(1) -172	Deputy Sean Power	States Member (St. Saviour No.3); Planning Application Panel Chairman	<p>I submit some areas as bullet points that I think need review on the IP 2011. You will remember that I had major concerns and reservations about the Housing section of the Island Plan 2011 when it was debated in the Summer of 2011.</p> <p>My concerns have now come to the stage where there is a real and apparent need to review this section. You will remember that in the evolution of IP 2011, there were stakeholder and interest groups throughout 2007, 2008 and 2009. I registered interest and participated in the Housing, Economy, Agriculture and Tourism groups.</p> <p>My main focus evolved over that period of time and I contributed more to the Housing section than to other sections. As we watched the Northern Rock collapse in 2007, then the Lehmann Brothers collapse, the bail out of the British and Irish banks in the Summer of 2008, the pattern of demand changed for housing in Jersey.</p> <p>The rush to buy and for potential purchasers to outbid each other suddenly ended and as we have seen over the past five years, at least 2000 category B houses have become available for sale on the local market. Developers such as Dandara have also affected the market by creating a large number of new builds and this has helped control price inflation. In my experience of working on the Planning Applications Panel since the introduction of IP 2011, it has become clear to me that the IP 2011 has major flaws. I list these as follows and some overlap other areas.</p>	Comments noted.
			<p>The decision to concentrate most housing development in the St. Helier area, protecting the Green zone is laudable. However, many examples have emerged since the introduction of IP 2011, where applications for a development of some kind in the Green zone that have had individually justifying criteria and where little or no discretion was applicable.</p>	<p>Policy NE7: Green Zone is the subject of review presently.</p> <p>Notwithstanding the review of the policy, the law makes provision for decision-makers to approve development proposals that do not accord with the Island Plan where they consider that there is sufficient justification to do so.</p>
			<p>In other cases, the transition from IP 2002 to IP 2011 affected some applicants and buildings in a restrictive manner and many applications were refused that had some merit or redeeming features.</p>	<p>There will inevitably be a small tranche of applications that fall to be submitted under one planning policy regime and determined under another: the forthcoming Island Plan should, however, become increasingly material as it progresses towards adoption and should help inform the formulation of development proposals.</p>

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			<p>In other cases, the demand for category B housing is over supplied and the supply of category A or social housing is under supplied. There is a significant number of category B houses for sale and an significant shortage of social housing and specifically first time buyer housing.</p> <p>An important distinction has to be made here in the definition of affordable and first time buyer housing and gateway eligibility is a complex and clouded issue. Many young couples starting out have a mean income of between £50,000 and £75,000 can borrow a multiplier of five and in this case, between £250,000 and £375,000. The trickle of homes completed and made available either through an assisted deposit scheme is other mechanism is poor in the extreme and will cause problems for the future when mortgage finance begins to become available again.</p> <p>While a surfeit of flats and apartments has been created by developers in the past five years, many couples starting a family will continue to aspire to owning a house. This provision is not available and schemes such as those developments at fields 190/192 La Moye and the Uplands Hotel sites are anything but affordable and are a disappointment.</p>	<p>The Minister's proposed amendment seeks to ensure that the planning system, as far as possible, can assist those most in need of assistance to access homes, for both rental and homes for purchase: the new definition of Category A homes seeks to achieve this.</p> <p>The delivery of this potential additional supply of affordable housing needs to be seen as part of a suite of other affordable housing initiatives, such as the deposit loan scheme, managed by the Strategic Housing Unit.</p>
			<p>What is clear to me is that dotted across the island are old employment sites that are highly unlikely to be used again for agriculture or economy use. These sites along with all glasshouse and greenhouse sites should be listed and assessed for suitability and re-use for housing.</p> <p>There are some old employment land sites that are eminently suitable for social or first time buyer housing. There are also glasshouse and greenhouse sites that are in such a dangerous condition that they need to be demolished and cleared. The department should consider a formula to be designed to allow the demolition of these eyesores and the owners should in some cases be allowed to seek a planning permit to recoup costs and to incentivise the return of a high proportion of this land to proper agriculture use. I would like to expand on these ideas at the hearings to follow.</p>	<p>Former employment sites have already been assessed as part of this review.</p> <p>The Minister's strategy of proposing to rezone the most appropriate of these supported by the use of existing States owned land to meet the affordable housing requirement is sound and sits comfortably with the existing Spatial Strategy of the Island Plan.</p> <p>The Minister considers that the 2011 Island Plan already has effective policies to deal with the potential development of outworn glasshouse or employment sites (at E1 and ERE7) which are outwith the scope of this interim review.</p>
IR(1) -117	Deputy Steve Luce	States Member (St. Martin); Environment Scrutiny Panel member	<p>I very much hope that this review by the Inspector will consider more than the specific issues listed.</p> <p>It is my view that we should not "pick and choose" which parts of the IP need reviewing.</p>	<p>The Minister considers that the majority of the 2011 Island Plan remains sound and fit-for-purpose, and is bringing forward this interim review principally to deal with the matter of affordable housing, in light of changed circumstances and new data.</p> <p>The Minister is required, under the auspices of P.71/2013, to determine whether other parts of the Plan require revision and will report his findings on this matter as soon as he is in a position to do so. Any proposal to further revise the Plan will require and sound and convincing justification.</p>
IR(1) -129	Deputy Jeremy Macon	States Member (St. Saviour No.1); Planning Application Panel member	<p>New policy:- Should be a specific policy to address storage space in residential developments - where do you keep the Christmas tree? Looking and many properties and as they been expanded into the attic space removing storage space needs to be looked at.</p> <p>I would like to make it applies to all residential policies but I think that we need greater clarity to do with basements. For example it may not do any harm to the visual character to the area and may not increase the occupancy of a dwelling but has an impact all the same.....</p>	<p>Comments noted but outwith the scope of this interim review.</p> <p>The Minister intends to issue revised SPG on residential standards, to include floor and storage space standards, in the New Year.</p>
IR(1) -221	Deputy John Le Bailly	States Member (St. Mary)	<p>I wish to make representation with regard to the forthcoming planning review. At the moment there is an overzealous approach with listing, resulting in resentment from property owners having their properties listed.</p> <p>Listing imposes unnecessary restrictions to the property and causes additional cost when undertaking repairs and maintenance and indeed minor alterations. There is no need for such a blanket listing. It should not be imposed on people. This contravenes Art 8 ECHR 1 &amp; 2.</p> <p>The listing has a ramification on basic improvements such as window and door replacements. Owners wishing to improve their property by upgrading to double glazed draught proof windows and doors are prevented from doing so by the</p>	<p>The matter of the Listing of buildings and places of historic, architectural or archaeological interest, and the planning policy regime that applies to them, is outwith the scope of this interim review.</p>

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			unrealistic requirements of the Historic Department wishing to retain all aspects of the existing fabric of the building regardless of the practicality of using more modern products which look ascetically in keeping with the property. It needs to be appreciated that these are private homes, not museums or places accessed by the public.	
			<p>Greenhouse sites Owners should be encouraged to sell sites to the States for use solely for low cost housing.</p> <p>Owners unwilling to sell to the States rather than a higher price to a property developer should be required to pay back to the States any subsidy or loan afforded to that property or business regardless of whether or not the current owner has been the trader. Perhaps this needs to be enforced by a proposition to that effect.</p> <p>Of course compulsory purchase should be available as a last resort. It is envisaged that a mix of rental and for purchase units be built on these sites.</p>	<p>Those former glasshouse sites with the most potential to provide new affordable housing are already proposed for rezoning for this purpose as part of this interim review. It is these sites that sit most comfortably with the existing Spatial Strategy of the 2011 Island Plan.</p> <p>Other glasshouse sites have been similarly assessed but are not considered to be appropriate for use as affordable housing sites when assessed against the planning policy framework provided by the 2011 Island Plan.</p>
			<p>The mix suggested by Planning being 80% rental and 20% purchase. I believe that the mix is the wrong way around, we need to provide 80% purchase.</p> <p>There are many people who are forced to rent in the private sector and social housing having given up any hope of buying. These people could purchase their own home at a cost a little over the cost of rental. If that were to be taken up there would be a significant difference in the requirement for social housing and also a stabilization in private sector rents.</p>	<p>The proposed 80/20 split is based upon the current evidence base of needs.</p> <p>The Housing Department already operates a policy which enables existing social rental tenants to buy their home: about 15 properties a year are purchased through this mechanism.</p>
			<p>Affordable housing. A contradiction in itself. All housing should be affordable regardless of income. This is achievable subject to the purchase of the right sites i.e. greenhouse sites and possibly Greenfield sites which are no longer viable to the agricultural industry coupled with a radical change in construction methods of basic housing units to suit that band of housing.</p> <p>This category of housing needs to be kept in the low price band for perpetuity. Restrictions will have to be applied i.e. to whom it is accessible, re income range. The property remaining in the price bracket only incurring a cost of living increase when selling to others in the income range. No changes to the footprint on the understanding that if the property no longer suits requirement then the owner moves on.</p>	<p>The decision to provide more affordable and social housing is a key action of the States Strategic Plan 2012.</p> <p>The latest evidence on affordability indicates that open market housing is beyond the reach of many people in Jersey (see: <a href="http://www.gov.je/Government/JerseyWorld/StatisticsUnit/Prices/Pages/HousingAffordability.aspx">http://www.gov.je/Government/JerseyWorld/StatisticsUnit/Prices/Pages/HousingAffordability.aspx</a>)</p> <p>The Minister's proposed definition of affordable housing seeks to ensure that the value of the land is regulated by the ability of those people on or below the median income level to access the homes to be built on each site.</p> <p>A new legal framework is to be developed in order to keep this housing affordable in perpetuity.</p>



Ref	Name	Agent/ Organisation	Reasons for answer	Minister's Response
IR(1) -138	Deputy John Young		<p>I believe this Policy revision does not sufficiently address the fundamental problem of land availability for housing and affordability in Jersey.</p> <p>Following an increase in population of 10,000 from 2001 to 2011 and fuelled by a hot economy prior to 2008, the demand for homes has exceeded supply for several years. This has been a major factor in the unsustainable increase in house prices and has left us with a legacy of inflated prices.</p> <p>Movement in the present house market seems mainly to be at the very top of the market or in flats. This has given rise to an increase in the demand for houses to rent. The need is to increase the supply of affordable homes in a way which allows the market to absorb them without unacceptable impact.</p> <p>The affordable housing sites identified and zoned for Category A (Need) Housing in the 2002 Island Plan have now been developed for first time buyers, sheltered housing or social rental. In 2008 additional land was zoned as lifelong homes for over 55's for sale and rental. These developments have also been completed or are in progress. In 2011 the Island Plan ceased the limited release of green field land for affordable housing relying partly on states owned sites (Policy H1) and an experimental new policy (H3) which imposed a financial obligation upon private (Cat B) housing which policy was never implemented.</p> <p>The States performance over the past two years in delivering housing on the sites it controls has been slow, reliance is being placed on sites dependent on completion of other States Projects. South Hill has disappeared off the list, Girls College has taken an age to procure, Summerland will be years away. No mention is made of other States owned sites which can make a contribution , including the former d'Hautree site which has lain empty for decades.</p> <p>The amended plan proposed continues to rely on States owned sites for affordable homes supplemented by four privately owned glasshouse sites (H1) plus two green fields in St Ouen and St Martin which are to be zoned for affordable homes. These sites are to have an affordable homes regime of 80% rental homes and 20% sale homes forced on them with the threat of compulsory purchase in default. I would not expect this policy to be either agreed.</p> <p>Each of the four glasshouse sites chosen are controversial ,have their own history , several were previously put forward in the draft plan 2011 for a mix of first time buyer homes , social rented and sheltered housing but were withdrawn at the last minute. If these sites succeed in gaining community support at the Inquiry and States approval, the landowners may be reluctant to cooperate. I could not support compulsory purchase to enforce the 80/20 rental regime applied in this way.</p> <p>The H3 policy did not deliver any affordable homes from private sector sites and is argued to have inhibited the development of Cat B homes (homes to meet demand). There is evidence to support this. The recent land availability report shows that there are valid planning and building consents outstanding for nearly 2,000 Cat B homes which are not being built.</p> <p>I was surprised and disappointed that to be told we will not see more housing on the vacant land the public owns in the St Helier Waterfront until 2020. We need the housing units to meet the backlog, so something must be wrong with our policies. The Island Plan revision now abandons the private site policy (H3) as unworkable and I strongly agree we need a replacement policy for privately owned sites. However the Proposal H3 offered to replace H3 is vague and insufficiently defined.</p>	<p>Whilst these comments are noted the Minister considers it relevant to note that since the approval of 2011 Island Plan nearly 150 Cat A homes have been built, with another 150 under construction at the start of 2013, and planning permission has been secured for the development 250 other Cat A homes.</p> <p>The supply of homes on States-owned housing sites in the next few years is also set out in the proposed revision to the Plan (see para. 6.55-6.56), which will deliver over 100 units by 2015, with another 300 units by the end of the Plan period.</p> <p>It is also relevant to note that Policy H1 clearly makes reference to the potential of other States sites to further contribute to the delivery of affordable homes should they be considered for disposal during the remainder of the Plan period. The La Motte Street Youth Centre site and the former Norman's timber yard are explicitly identified in the policy. Other sites, such D'Hautree may also contribute, but their status and future remains to be determined and the States will need to have regard to the public benefit in developing for affordable homes as opposed to other uses, and the potential capital receipts that these might deliver for public benefit.</p> <p>Whilst it is acknowledged that the proposal to re-zone former glasshouse sites for the provision of affordable homes (under Policy H1) remains to be considered by the States, it is relevant to note that three of the four landowners are, on the basis of evidence submitted as part of this consultation, clearly willing to support the zoning of their land for this purpose, with the position of the fourth landowner remaining to be clarified. It is considered that the sites remain viable for the development of affordable homes.</p> <p>Clearly, the current Policy H3 has not delivered any homes as the policy remains to be implemented.</p> <p>The progression of development on the St Helier Waterfront will be determined in accord with the existing masterplan for that area until such time that the masterplan is revised.</p> <p>Despite the proposal to set the current Policy H3 aside, Ministers continue to support the principle of seeking to secure development from land that benefits from planning permission and will seek to develop a mechanism to do so, as set out at Proposal H3.</p>



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			<p>The 2011 Plan expects a greater amount of affordable homes to be produced from Cat B developments. These are expected to arise from the built up areas in which land already has high existing use values. According to paragraphs 6.79- - 6.81 of the amendment these are proposed to be developed at a higher density, under a policy of "garden grabbing" which is presently causing much upset and adversely affecting the quality of life in established residential communities. It has led to the production of expensive luxury housing rather than affordable homes and I submit this policy has not worked.</p> <p>The need to review this policy and GD3 was agreed by the States in approving my proposition (P71/2103). This is now an integral part of the affordable homes policy and this should be considered concurrently. There is no demonstrated gain, only overdevelopment as a visit to Samannah in Les Landes Avenue, St Brelade, will show. This policy should be discontinued. Subject only to the vague new proposal H3, the plan leaves Cat B housing entirely to market forces. We need policies that encourage affordable homes to be developed for sale to first time buyers both in the built up area and subject to village plans being agreed by the Minister, in the parishes. We need affordable housing from both Cat A and Cat B developments to achieve a healthy and balanced housing market.</p> <p>I agree we need Cat A developments on States owned sites to be retained as affordable in perpetuity whereas Cat B should be open market. We also need to address key worker accommodation It will be more certain for the backlog of Social Rented Housing to be produced from the States owned sites.</p> <p>I also question whether the focus of the new policy by imposing an 80% requirement for social rental housing needs to be sustained for the remaining 8 years of the plan, once the backlog of rental accommodation has been reduced. This policy emphasis on rented housing based on tenants paying 90% of open market rentals will require a significant public subsidy from income support. This needs to be counterbalanced by further measures to encourage first time buyers get their foot on the housing ladder; otherwise we will be building up an unnecessary level of dependency on the States for the future.</p>	<p>The proposed revision to the Island Plan does <u>not</u> seek to rely on the delivery of affordable homes from Category B development. This was clearly the intention with Policy H3 but that is proposed to be set aside.</p> <p>It is considered that some Category B development does contribute towards the need for more affordable forms of housing at the lower end of the housing market but no reliance is placed on this in seeking to meet the level of affordable homes required during the remainder of the Plan period, as clearly set out at Table 6.3 (p.242) of the proposed revision to the Plan. There is some evidence that the housing market is seeking to respond to demand and to provide products which better meet current housing demand.</p> <p>The Minister does not accept that the Spatial Strategy of the Plan is flawed: the current thrust of the Plan is seeking to secure the optimum benefit from the development of already developed and there is an explicit intent (at GD3) to ensure that the density of development is optimised, having regard to proper considerations of design and the impact on neighbouring properties. The Minister will, however, seek to review the operation of this policy under the auspices of P.71/2013, and will consider whatever evidence is considered to exist that might suggest that the matter requires fundamental review.</p>

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			<p>The plan revision (Policy H1 and Policy H5) and paras 6.82- 6.84 of the amendment is also socially divisive in respect of sheltered housing. This will do nothing for the creation of sustainable communities throughout the parishes. Sheltered housing is required in the right locations convenient to parish centres irrespective of the occupant's financial status.</p> <p>The new policy proposed is not consistent with our strategy we have adopted to keep people in advanced years in their own homes as long as possible. This needs to be within the communities in which they were brought up and where their personal support systems lie.</p> <p>I am advised by planning officers that affordable homes in the rural settlements do not preclude sheltered housing but such Cat A sheltered housing developments will now be exclusively for those people who qualify under the new Housing gateway, i.e. those of insufficient financial means. This Policy means that access to Sheltered Housing in the parishes will no longer be generally open to parish residents. Under this amendment the land proposed to be zoned in the parishes for Cat A can be used for sheltered housing but only to those people in the housing gateway. Those parish residents who need sheltered housing but fall outside the new rules will need to look to Cat B developments whether they are in the existing built up areas, in town and elsewhere, entirely at the whims of the market. Current Cat B policies do not favour the development of sheltered housing nor over 55 housing. I cannot think of a more socially divisive policy and I do not support it.</p> <p>I submit we should readopt the very successful 2002/ 2008 Island Plan spatial policies in respect of the location of sheltered housing in the parish communities, as is currently being applied in those sites under development. The need for sheltered housing should be based on personal criteria, taking account of the person's individual physical and social support needs which are required to be met for them to remain in their home. This policy should apply equally to all parishes.</p> <p>In St Brelade a housing development is planned at para 6.56, Belle Vue Phase 2, which I would like to see developed for sheltered housing for persons of parish connections including some units for sale, releasing their homes also in the parish for first time buyer homes. Such a scheme could have financial conditions imposed to ensure this objective is met.</p> <p>There are other sites in the parish which are potentially suitable for sheltered housing which should be considered in our parish plan.</p>	<p>The Minister supports the strategy of seeking to ensure that elderly members of our communities can stay living in their own homes, supported by the networks with which they are familiar and which can address health needs, for as long as possible, and indeed this is an objective of the States Strategic Plan 2012 and a critical plank in the Island's new health strategy (Health and Social Services: a new way forward P.82/2012). It is relevant to note that the health strategy seeks to increase the number of service users being cared outside of a hospital or residential care setting and seeks to enhance community services to develop and deliver care to an individual's home.</p> <p>Since 2007 all new homes in Jersey have been built to local Lifetime Homes standards (amended in 2012), which includes improved provision for access to, use and adaptation of dwellings to better meet the requirements of an ageing society and which better enables people to remain in their own homes for as long as possible: this is required through Building Bye-Laws.</p> <p>In addition to this response to the needs of an ageing society in all new homes, there is a healthy level of provision of development schemes specifically for the over-55s (for sale and rent) on sites throughout the Island currently: at the beginning of the year there were outstanding commitments of some 350 homes specifically for the over-55s. These may provide additional features over and above the existing Jersey Lifetime Home standard (such as an additional bedroom), or just be a site-specific collection of new homes exclusively for people aged over-55.</p> <p>This does not include planned redevelopments and refurbishments of existing Housing Department sites, which are producing numbers of affordable social rented units aimed at older, less mobile members of the community. There will also be significant opportunities for private 'windfall' developments throughout the built-up areas of the Island where private developers can address identified housing demand.</p> <p>The Minister also supports the proper planning of communities and the development of community infrastructure necessary to sustain them in a manner which seeks to ensure that places are sustainably developed. The Minister remains to be convinced that the accretion of sites on the edge of the built-up area for the exclusive development of low density homes for the elderly represents the best way to plan for the ageing society in a way that ensures that elderly members of the community can best engage and receive the support that they need from the local communities of which they are part and the Island's health services.</p> <p>The Minister will, therefore, need to ensure that communities have sought to explore all alternatives in seeking to plan for the needs of the ageing society from within existing built-up areas, in a way that makes best use of land and buildings and which takes account of enhanced community health provision, before consideration is given to the release of greenfield land for this purpose.</p>
			North of Town Conversion of Vacant Offices to Housing New Policies are required to encourage the conversion of the large amount of empty offices into residential accommodation, including relaxation of building bye- laws.	Noted but outwith the scope of the interim review.
			<p>Les Quennevais School- New Site</p> <p>The Education Minister has informed the public and the States today that he is considering alternative sites in St Brelade for the new secondary school serving the west of the Island and will be making a submission to the Island Plan review naming the selected site to the Inspector but declines to identify the selected site before the cut off date for public consultations.</p> <p>The need for the new school is urgent and I do not wish it to be delayed for a procedural reasons. Therefore I wish to make a response to the inquiry once the ministers proposed site is known.</p>	<p>The Minister is aware of the work being undertaken by ESC in relation to the potential provision of a new Les Quennevais School: the Minister for ESC has made representation to the Plan in relation to Policy NE: Green Zone, which the Minister is minded to accept.</p>

Ref	Name	Agent/ Organisation	Reasons for answer	Minister's Response
IR(1) -163	Deputy Andrew Green	States Member (St.Ouen); Minister for Housing	<p>From attached letter to Minister As you know I have been in favour of the proposed review of the 2011 Island Plan from the outset. It is vital in my view in providing an opportunity for States Members to consider how the States will deliver upon the commitment it made in the States Strategic Plan to 'House our Community'.</p> <p>We all accept that the price of homes is too high for many Island residents, even those with above average incomes. We should also accept that price is an outcome of the supply and demand equation and that promoting affordability requires us to provide a sufficient supply of homes over a number of years.</p> <p>What cannot be in doubt is that there is a very clear demand for new affordable homes for rental and purchase. The Affordable Housing Gateway is providing regular data on the waiting list for affordable homes. The most recent statistics (31st August 2013) show that even allowing for optimal use of the existing social housing stock there is a need for 763 new social rented homes. The biggest shortfall (351 units) is in respect of the number of new 1 bedroom homes which are suitable for people as they grow older. It is important to say though that these are current needs and not projections. Some new land for affordable housing is necessary and appropriate in my view.</p> <p>Sites should predominantly provide for social rented homes and I have supported the limited rezoning proposals set out at Appendix B to your review document for this reason. These sites are key in meeting our need for new homes and I hope that States Members will consider that fact when the proposals are debated.</p> <p>I have set out below some specific comments which relate to your review document, I hope that you will consider the points raised and find them helpful.</p>	<p>Comments noted and welcomed.</p> <p>The Minister's proposed amendment seeks to ensure that the planning system, as far as possible, can assist those most in need of assistance to access homes, for both rental and homes for purchase.</p> <p>To meet current housing needs, the required tenure split on all of the private sites proposed for rezoning is 80% social rental and 20% affordable homes for purchase. This is based on the latest evidence of need derived from the 2012 Housing Needs Survey which is informed by data derived from 2012 Housing Affordability in Jersey report and the 2012 Jersey House Price Index .</p>
			<p>6.3 The States has decided to change the way in which housing is provided and in particular has directed that a Strategic Housing Unit should be established to set long term housing policy. In addition, the Housing Department will become incorporated in 2014 and will continue to manage over 75% of the Islands' social housing and to operate its deferred payment scheme under the direction of an independent Board. This is an important organisational change to highlight.</p> <p>It is important to be clear that the sources of supply are varied - including each of the private sector, Housing Trusts and Associations, and the States of Jersey itself, including via the States of Jersey Development Company, and the Housing Company, as well as the Parishes.</p>	<p>The delivery of this potential additional supply of affordable housing which would result from the Minister's proposed amendment to the Island Plan needs to be seen as part of a suite of other affordable housing initiatives as noted in the Housing Minister's comment.</p>
			<p>6.13 As a generality, it should be for the Strategic Housing Unit to provide definitions of affordability through the Housing Gateway, rather than an Island Plan process, however, the definition included in 6.13 was developed in conjunction with the Strategic Housing Unit and Council of Ministers, and therefore no substantive comment is made on the actual definition of affordable housing and the Strategic Housing Unit is able to develop the Gateway within the Island Plan definition.</p> <p>In addition, it is suggested: The definition suggests that Affordable Housing may be owned by 'a housing trust or association which provides homes to eligible families or individuals.....' there is no mention of Parishes, the States or of the new Housing Company which will commence operations on 1st July 2014. Could it merely say a Registered Affordable Housing provider?</p>	<p>Comment noted.</p> <p>The Minister is minded to make amendment to include general reference to 'Registered Affordable Housing providers' where relevant in his proposed amendment.</p>

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			<p>6.30 In referring to why the demand for social housing has increased recently the document says 'This latest demand includes that from key workers, defined as locally qualified employees (a-h category) working in the public sector and in private sector education and health services.' There are two things with this paragraph:</p> <p>1. Who is and isn't a key worker has yet to be defined from a policy perspective</p> <p>2. Essentially employed persons, including Nurses are not currently eligible for access to the Gateway and so they cannot be included in the demand for homes from the Gateway.</p>	<p>This definition is based on that derived from the Jersey Housing Affordability Report 2012 (SoJ Statistic Unit) Section 45 Key worker analysis (see: <a href="http://www.gov.je/Government/Pages/StatesReports.aspx?ReportID=919">http://www.gov.je/Government/Pages/StatesReports.aspx?ReportID=919</a>)</p> <p>This defines key workers as individuals employed in the public sector; represented by teachers, police officers and nurses who have worked in these roles for three to four years.</p> <p>The Island Plan is merely setting the background rather than defining the actual demand to be met. It is for the Strategic Housing Unit to review all the definitions of tenure, including that of key workers, together with the eligibility criteria for the Housing Gateway.</p>
			<p>6.33 The strategy here should be to encourage all housing needs to be reflected in the Gateway and for the Gateway to be the definitive demonstrator of housing needs alongside statistical surveys.</p> <p>If for instance the Population Office is aware of the numbers of people who may qualify year on year from the present cohort of unqualified residents then surely these numbers can be added to the Gateway data to enhance it further and with increasing accuracy. This would allow for much longer term planning.</p>	<p>Comments noted.</p> <p>The issue raised is a matter for the Strategic Housing Unit and the management of the Housing Gateway.</p>
			6.56 - 6.59 The figures have developed since publication, although not materially, and latest update figures can be supplied.	The Minister would be pleased if the Housing Department could ensure that his department was kept apprised of change to housing supply figures, as they occur, in order that information can be kept up-to-date and incorporated in to revised drafts and publications.
			Reference to Housing Associations throughout Section 6 should more properly refer to Housing Trusts.	The Minister is minded to make amendment to include general reference to 'Housing Trusts' where relevant in his proposed amendment.
			<p>Clearly the delivery of any homes on the proposed sites for Category A housing will take time. The Island Plan will not be debated until 2014 and given the uncertainty about the rezoning proposals it seems unlikely that landowners and developers will be willing to invest significant sums in preparing outline drawings and planning applications.</p> <p>Strategies which might help build confidence amongst developers and landowners might be:</p> <ul style="list-style-type: none"> <li>Identifying and nominating a Planning Officer for each site and ensuring that that Officer retains responsibility for the site throughout</li> <li>Offering timely and robust pre-application advice on a priority basis</li> <li>Offering to defer the payment of application fees until the outcome of the rezoning debate as a means of stimulating developers to make applications, thus significantly truncating the post debate process and bringing forward the delivery of completed homes.</li> </ul> <p>Financing can be an issue for developers, particularly at present. To assist with reducing financing costs you might:</p> <p>Agree to defer collection of planning and Building Control fees to completion of the project or until the sale units are sold</p>	<p>Comments noted.</p> <p>These are operational issues and are not material to a review of the Island Plan.</p> <p>They can, however, be considered within the context of the operation of the Development Control service, where they are not already in place.</p>
			Agree not to seek a Percentage for Art on schemes rezoned under the 2013 Island Plan Review	The provision of Percent for Art under Policy GD8 of the 2011 Island Plan is not mandatory but is encouraged on major schemes to support place-making and the development of community and local identity in accord with the States Cultural Strategy and the objectives of the Island Plan.



Ref	Name	Agent/ Organisation	Reasons for answer	Minister's Response
			<p>Land banking by developers may be a concern and steps should be taken to minimise the opportunity for this to occur. You might give consideration to measures such as:</p> <ol style="list-style-type: none"> <li>1. Limit the effect of any decision to rezone the sites proposed in Appendix B so that work on site must commence within 2 years of rezoning and homes completed within 4 years.</li> <li>2. Insist that the social housing must be completed and transferred to a registered provider before any of the homes for purchase may be occupied or sold.</li> <li>3. Insist that a suitable social housing partner, to receive the rental homes on completion, is nominated and is party to the Planning Obligation Agreement prior to commencement of the development.</li> </ol>	<p>Comments noted.</p> <p>These are operational issues and are not material to a review of the Island Plan and are dealt with, as a matter of course, within the operation of the Development Control service, except item 1. which is considered to be <i>ultra vires</i>.</p>
IR(1) -182	Gerald Fletcher	Jersey Hospitality Association	<p>For the avoidance of any doubt, JHA policy is still in line with the cross sector response submitted to the Department in October 2012. This response previously stated Policy H3 to be unworkable and that the Island Plan should be reviewed by the States to consider alternative solutions that will actually deliver affordable housing. As a result, we support Policy H3 in the Island Plan (2011) being set aside.</p> <p>To reiterate the views made in our earlier response, the JHA considers that all provision needs to be made through States-owned land previously identified and which is suitable for affordable housing. However, we also concur with the view that these sites are unlikely to deliver in the short term, for which there is the greatest need, and as such a limited number of appropriately located glasshouse sites should be re-zoned for affordable housing.</p> <p>Those sites recommended in the Draft Island Plan (September 2009) and the additional sites recommended by the Inspector to the Minister in response to the Draft Island Plan (September 2009) would enable delivery in both the short term and over the 10 year life of the plan, satisfying the need for the affordable 1000 homes that the Plan says are required.</p>	<p>Comments noted.</p>
			<p>Alternative Mechanisms recommended by the JHA</p> <p>1. Develop States-owned Land</p> <p>Therefore, we still believe that there are alternative means of providing 1000 affordable homes over the plan period. For instance, the States have identified States-owned sites appropriate for affordable housing, and this is something the UK government, in earlier pronouncements, have proposed on their publicly-owned land.</p> <p>Unfortunately, these sites will not deliver affordable homes in the short term for which the Inspector, in his report to the States, identified there is the greatest need. Therefore, it is understood that a limited amount of additional land will therefore have to be re-zoned.</p>	<p>Whilst these comments are noted the Minister considers it relevant to note that his proposed amendment clearly sets out the supply of homes on States-owned housing sites in the next few years (see para. 6.55-6.56), which will deliver over 100 units by 2015, with another 300 units by the end of the Plan period.</p> <p>It is also relevant to note that Policy H1 clearly makes reference to the potential of other States sites to further contribute to the delivery of affordable homes should they be considered for disposal during the remainder of the Plan period.</p> <p>Taken together with the other elements of the Minister's proposed amendment, it is not considered necessary to identify any further sources of housing supply.</p>
			<p>2. Develop Higher Densities in Town of St Helier</p> <p>In our view, the Draft Design Guidance for St Helier represents a missed opportunity as it sets too many constraints against high density residential development which ought to be able to be successfully integrated in the town of St Helier.</p> <p>For instance, the policy that limits the height of new development in town is not considered to be helpful in this respect.</p>	<p>It is the 2011 Island Plan Policy BE5 which determines the planning policy regime for dealing with proposals for tall buildings: the St Helier Design Guidance provides a useful clarification as to how proposals for tall buildings should be considered.</p> <p>Whilst the policy presumes against the development of tall buildings which exceed the height of others within the same character area, proposals which seek to exceed this height must provide a strong justification for doing so.</p>



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			<p>It is therefore relevant that the town of St Helier and its surroundings is seen as the main focus for new development in the island, specifically to avoid the need to develop green field sites which therefore will necessitate higher densities given the limited level of land supply.</p> <p>The JHA does not support development on green field sites. However, it is accepted high residential densities in town should not be at the expense of general amenity and that adequate car parking, and private and public amenity space needs to be provided to ensure acceptable living conditions and standards.</p>	<p>The thrust of the Spatial Strategy of the 2011 Island Plan remains unaltered by the Minister's proposed amendments such that most of the Island's development needs should be met from within the existing built-up area: the proposed rezoning of land would, in total, provide about 350 homes out of a total supply of over 3,500.</p> <p>The current Plan is also seeking to secure the optimum benefit from the development of already developed and there is an explicit intent (at GD3) to ensure that the density of development is optimised, having regard to proper considerations of design and the impact on neighbouring properties.</p>
			<p>3. Zone a limited number of appropriately located Redundant Glasshouse Sites for Affordable Housing.</p> <p>To offset this shortfall in the short term, the States need to review the Island Plan and reinstate the Policy H1 Category A Housing sites proposed in the Draft Island Plan (September 2009). Indeed the preamble to Policy SP1 of the Island Plan states "to meet the extent of the Island's housing needs, there may also be a requirement to zone land outside of the Built Up Area"</p>	<p>The Minister acknowledges the importance of protecting the countryside and has sought to identify those sites which have already been subject to some form of development, in the form of development as glasshouses in support of the agricultural industry, on the edge of the existing built-up area as having the potential to contribute to the Island's housing needs.</p>
IR(1) -57	H Surcouf		<p>These types of developments inevitably impact on the value of existing privately owned properties in the immediate vicinity, occupied by the very people who are funding the social housing. This is wholly unfair.</p> <p>Before any further rezoning or development is considered the States need to get a grip on immigration and conduct an audit of the financial resources of all existing tenants.</p> <p>It is well known that many social housing properties are occupied by individuals/families who should be in the private sector.</p>	<p>The impact of changes to the Island Plan upon existing property prices is not a material planning consideration. The Island Plan simply seeks to respond to the direction provided by the States Strategic Plan and does not determine policy related to population and immigration.</p> <p>The management of existing States housing stock is not a land use planning issue and is outwith the scope of this Island Plan interim review.</p>
			<p>Also, instead of building more properties the States should consider buying the hundreds of flats and 2/3 bedroom houses that are for sale in the private sector in and around the town and immediate area. Not only would this give a kick start to the housing market, as those trying to sell could move up to the next property, it would immediately make housing stock available.</p>	<p>The availability of open market housing is an important element of overall housing land supply and is required because of demographic change over the Plan period (see para. 6.15-6.37 of the proposed changes to the Housing Chapter)</p>
			<p>The continued development of this island is unsustainable and the Jersey born people of this population have had enough. Please stop the destruction of this beautiful island.</p> <p>Are the planning department so led by the nose by Dandara that they have completely lost their way?</p> <p>These comments also apply to all other re-zoning proposals to the island plan and large scale developments that are planned across the island.</p>	<p>The decision to provide more affordable and social housing is a key action of the States Strategic Plan 2012 to meet the needs of the Island's community.</p> <p>The latest evidence on affordability indicates that open market housing is beyond the reach of many people in Jersey (see: <a href="http://www.gov.je/Government/JerseyWorld/StatisticsUnit/Prices/Pages/HousingAffordability.aspx">http://www.gov.je/Government/JerseyWorld/StatisticsUnit/Prices/Pages/HousingAffordability.aspx</a>)</p>
IR(1) -162	Ian Taylor	Jersey Chamber of Commerce	<p>Affordable Housing (Policies H1, H3 and H5) After an initial inspection it appears that Policy H3 has been removed from the document, however, this may not be the case.</p>	<p>The Minister is proposing that Policy H3 be set aside.</p>
			<p>We believe that the percentage split for rezoned land needs further discussion to ensure that the developments are viable or no development will take place.</p>	<p>The Minister considers that the development of the sites proposed for rezoning is viable and no evidence has been submitted to challenge this.</p> <p>It is relevant to note that three of the four landowners are, on the basis of evidence submitted as part of this consultation, clearly willing to support the zoning of their land for this purpose, with the position of the fourth landowner remaining to be clarified.</p>

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			<p>The demand for housing is to be based on net inward immigration of 325 persons per year. This has been exceeded for each of the last 10 years, indeed, ranging from between 500 and 1,400 per year during this time.</p> <p>Also, only 1000 affordable homes are proposed over the plan period. This compares to 1850 affordable homes for each of the previous two Island Plan periods (1987 and 2002). This seems hardly credible when the latest Census (2011) has shown a level of population increase that the States had not anticipated and, also, having regard to the fact that further sites had to be re-zoned during the 1987 and 2002 island Plan periods, when more affordable homes were proposed than is the case now.</p>	<p>The Island Plan simply seeks to respond to the direction provided by the States Strategic Plan and does not determine policy related to population and immigration.</p> <p>The Minister's proposed amendment which seeks to provide additional housing supply is based on the latest evidence of housing supply, demand and affordability provided by the 2012 Housing Needs Survey (undertaken as part of JASS); the Housing Affordability Report and the latest Residential Land Availability report. Data on changes to household size from the 2011 Census has also been factored into the modelling of housing demand.</p>
			<p>The 2012 Housing Affordability report confirmed that "Between 2002 and 2012, a working household with mean net income was not able to service a mortgage affordably on the purchase price of a median priced house of any size". Also, a significant part of the supply is to come from un-named States sites (which the Interim Plan acknowledges may not actually materialise).</p> <p>Therefore, The Minister is not re-zoning enough privately-owned (e.g. glasshouse sites) for affordable housing. To use un-named States-owned sites is not sufficiently transparent. If not enough sites are proposed then this problem will frequently reoccur resulting in continued pressure for private developers to provide affordable housing on all their sites.</p>	<p>The Minister considers that the proposed amendment to the 2011 Island Plan is sound and will ensure an adequate supply of homes to meet the anticipated demand over the remainder of the Plan period. Proposed levels of provision would provide a 6% buffer of overall housing supply.</p> <p>The supply of homes is clearly set out, on States and other sites, at paras. 6.38-6.85 of the proposed Housing Chapter.</p>
			<p>Therefore, more privately owned sites should be re-zoned specifically for affordable housing to meet increased demand and consequent lack of supply, which the Interim Plan fails to recognize. We are only 2 years into the current Island Plan for re-zoning, if only 6 sites are re-zoned, as is suggested, it will be only another 2 years before there is a realisation that insufficient sites were re-zoned. Therefore, dependent on the political agenda, it may well be that this pressure will cause Policy H3 to resurface; especially should there be a change in the on-Island economic situation. If further sites have then to be re-zoned this will result in a further 12 month process (similar to this Interim Island Plan process, including Consultation Period, Examination in Public etc).</p> <p>This can only add to delay and it is more appropriate to consider this matter issue now and re-zone more sites, or identify certain sites on a reserve list so avoiding a repeat Island Plan Review process. The Planning Inspectors raised this as a possibility in the last Island Plan review. This would be similar to the current H1 policy, whereby if there was a failure for delivery there was a trigger to re-zone Samarès Nurseries and Longueville Nurseries.</p> <p>What we propose is the creation of a "reserve list" of sites, which already identified, can be activated when supply is unable to meet the demand/need for affordable housing, especially given the uncertainty surrounding the deliverability of States owned sites. The States can be more responsive to supply affordable housing which will assist the construction industry in earlier procurement.</p>	<p>The Minister considers that the proposed amendment to the 2011 Island Plan is sound and will ensure an adequate supply of homes to meet the anticipated demand over the remainder of the Plan period.</p> <p>Proposed levels of provision would provide a 6% buffer of overall housing supply.</p> <p>The thrust of the Spatial Strategy of the 2011 Island Plan remains unaltered by the Minister's proposed amendments such that most of the Island's development needs should be met from within the existing built-up area and the Minister is keen to ensure that development activity remains primarily focussed on existing built-up areas of the Island.</p> <p>On the basis of the above, the Minister does not consider it necessary and/or desirable for a reserve list of sites to be prepared.</p>
			<p>There is a lack of provision in the Interim Island Plan for over 55s affordable housing, which should be located in the various Parishes, in order that residents can remain part of their community. The Housing Minister has voiced strong support for this but it is omitted from the Interim Island Plan.</p> <p>Providing the ability to downsize will result in a larger element of the existing housing stock becoming available for younger occupants.</p>	<p>The Minister supports the strategy of seeking to ensure that elderly members of our communities can stay living in their own homes, supported by the networks with which they are familiar and which can address health needs, for as long as possible, and indeed this is an objective of the States Strategic Plan 2012 and a critical plank in the Island's new health strategy (Health and Social Services: a new way forward P.82/2012). It is relevant to note that the health strategy seeks to increase the number of service users being cared outside of a hospital or residential care setting and seeks to enhance community services to develop and deliver care to an individual's home.</p> <p>Since 2007 all new homes in Jersey have been built to local Lifetime Homes standards (amended in 2012), which includes improved provision for access to, use and adaptation of dwellings to better meet the requirements of an ageing society and which better enables people to remain in their own homes for as long as possible: this is required through Building Bye-Laws.</p> <p>In addition to this response to the needs of an ageing society in all new homes, there is a healthy level of provision of development schemes specifically for the over-55s (for sale and rent) on sites throughout the Island</p>

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				<p>currently: at the beginning of the year there were outstanding commitments of some 350 homes specifically for the over-55s. These may provide additional features over and above the existing Jersey Lifetime Home standard (such as an additional bedroom), or just be a site-specific collection of new homes exclusively for people aged over-55.</p> <p>This does not include planned redevelopments and refurbishments of existing Housing Department sites, which are producing numbers of affordable social rented units aimed at older, less mobile members of the community. There will also be significant opportunities for private 'windfall' developments throughout the built-up areas of the Island where private developers can address identified housing demand.</p> <p>The Minister also supports the proper planning of communities and the development of community infrastructure necessary to sustain them in a manner which seeks to ensure that places are sustainably developed. The Minister remains to be convinced that the accretion of sites on the edge of the built-up area for the exclusive development of low density homes for the elderly represents the best way to plan for the ageing society in a way that ensures that elderly members of the community can best engage and receive the support that they need from the local communities of which they are part and the Island's health services.</p> <p>The Minister will, therefore, need to ensure that communities have sought to explore all alternatives in seeking to plan for the needs of the ageing society from within existing built-up areas, in a way that makes best use of land and buildings and which takes account of enhanced community health provision, before consideration is given to the release of greenfield land for this purpose.</p>
IR(1) -137	Janet Grimshaw		We absolutely object to building on Green Fields. Please accept this email as an official objection.	<p>The Minister acknowledges the importance of protecting the countryside and safeguarding agricultural land and is only prepared to continue to consider the release of greenfield land on the edge of existing rural settlements where;</p> <ul style="list-style-type: none"> <li>the sponsors of the site's development are willing and can demonstrate that they are able to develop the site for the creation of homes that contribute towards the Island's housing needs, as evidenced by the Housing Gateway and;</li> <li>it is demonstrated that there are no other viable development opportunities to meet the Parish's aspirations within the existing Built-up Area boundary</li> </ul>
IR(1) -220	Keith & Sophie Dixon		<p>The revised policies in the Proposed Revision are riddled with proofreading errors and would benefit from a thorough re-reading. For example, in revised policy NE6 (pages 24 to 28 of the Proposed Revision inclusive):</p> <p>the word "and" appears at the end of clause I.a. and I.b. of Policy NE6 but not, as one would expect, at the end of clauses I.c. and I.d thereof;</p> <p>there is no "and" at the end of clause 7.a.;</p> <p>and there is a full stop at the end of clause 11.b instead of a semi-colon.</p>	<p>Comments noted.</p> <p>The Minister will seek to ensure that any future publication is not riddled with proofreading errors.</p>
IR(1) -5	L & M Howard		<p>It is more than regrettable that this exercise is thought to be necessary at all.</p> <p>The 2011 IP was supposed to settle things for a 10 year period and this constant tinkering is not something to be welcomed. It seems that some of the proposed re-zoning is ad-hoc and presumably politically driven, the very last reason to do it!</p>	<p>The current review is brought to ensure that the Plan remains up-to-date, clear, comprehensive and capable of meeting current requirements: this is primarily driven by the need to provide more affordable homes.</p> <p>The decision to provide more affordable and social housing is a key action of the States Strategic Plan 2012 to meet the needs of the Island's community.</p> <p>The latest evidence on affordability indicates that open market housing is beyond the reach of many people in Jersey (see: <a href="http://www.gov.je/Government/JerseyWorld/StatisticsUnit/Prices/Pages/HousingAffordability.aspx">http://www.gov.je/Government/JerseyWorld/StatisticsUnit/Prices/Pages/HousingAffordability.aspx</a>)</p>
IR(1) -93	Matthew Sutton		<p>There is not enough new housing developments being planned for the northern parishes.</p> <p>Why is there a fixation in deempty between the South East, in particular between the St Clements Inner Road and the Coast Road. It won't be long before St Clement and Grouville become suburbs of St Helier.</p> <p>Much more work needs to be done to find and develop sites in the north and west, and to balance the burden of new housing. What is wrong with developing large tracts of land for a new village in L'Etacq, for example?</p>	<p>Policy H5 seeks to support housing developments in rural settlements which are predominantly in the northern Parishes.</p> <p>Any new housing sites should support the strategic objectives of the plan, determined by the spatial strategy at Policy SP1 which seeks to focus development on the existing settlement pattern in the Island. This is where the majority of services, amenities and infrastructure is located and can best contribute to the development of the most sustainable pattern of development in the Island.</p>
IR(1) -123	Mike Jackson		A good solution to permit the island plan to evolve to meet current and changing needs	Comments noted

Ref	Name	Agent/ Organisation	Reasons for answer	Minister's Response
IR(1) -166	Mr. Daniel Wimberley		<p>1 housing demand - population Obviously depends on population.</p> <p>If population continues to increase, the demand for land and the consequent damage to the islands beauty, or to the fabric and social cohesion of the urban areas, or both, will also continue to increase. Therefore BEFORE this plan revision is debated the new population policy must be debated by the states,. I believe that a population cap, and the measures to go with it are essential.</p>	The Island Plan simply seeks to respond to the direction provided by the States Strategic Plan and does not determine policy related to population and immigration.
			<p>2 housing demand - reducing household size</p> <p>Why not design and build accommodation, for different age groups, which provide for singles? These could have shared facilities such as kitchens and common rooms and laundry, thus saving precious space and cost, and also providing more social living space.</p> <p>This element of choice is sorely missing at present.</p>	<p>The Minister's proposed amendment to Policy H4: Housing mix seeks to address this issue.</p> <p>This policy is an important aspect of ensuring that right type of homes are developed based upon evidence of needs through the Jersey Annual Social Survey and housing needs surveys.</p> <p>The Minister will work with the Strategic Housing Unit in order to ensure that the Plan delivers homes which better meets the Island's housing needs.</p>
			<p>3 cost of housing The plan should state more clearly that the exorbitant cost of housing here is due to the cost of the underlying land. This was shown clearly by supporting documents for the island Plan but is skated over in the text in the Housing section. please include clear statement of the cost breakdown of typical units in Jersey. This would show that over half the cost of a house in jersey is the land value. Two points</p> <ul style="list-style-type: none"> <li>• One, the increase in land value must be taxed</li> <li>• Two the debate on this must happen BEFORE the debate on the IP revision</li> <li>• Three this tax could be ring-fenced and applied to reducing housing cost</li> </ul> <p>See the attached letter to the JEP for the argument on this.</p> <p><i>Dear Sir,</i></p> <p><i>Environment Minister Rob Duhamel wants to re-write the Island Plan, by re-zoning green fields and glasshouse sites, just 2 years after the Plan was approved by the States (after a week-long debate, I might add). This is just the latest move in the policy of more, more, more adopted by the growth party for many years now, in complete disregard of common sense, of what the public wants and of what the island can handle. I suggest that in order to meet the legitimate concerns of islanders, before any debate on the Island Plan revision, two conditions should be met.</i></p> <p><i>The first is that the States must agree measures to tax the increase in land value caused by re-zoning, before any such re-zoning is discussed. This windfall tax would achieve three things. First, it would replenish the States coffers in a completely pain-free way. The tax would fall on wealth that did not even exist before the rezoning. No one loses anything.</i></p> <p><i>Secondly, it would remove the potential for corruption within the planning system in exact proportion to the scale of the tax. If it were to be levied at 100% then all temptation for corruption would be removed - there would be nothing to be gained in a re-zoning decision by anyone. If it was set at 50% then 50% of the incentive for corruption would be removed. Is it important to remove any perception of corruption, any possibility for corruption from our planning system? Well, looking at some of the extraordinary permissions granted in the past, I believe that it is.</i></p> <p><i>And thirdly, it would reduce the amount needed to be raised in tax from everyone else. Who could disagree with that? Well our last States Assembly, that's who, when they rejected this proposal when I brought it. Readers might ask themselves how anyone could vote for the States creating instant millionaires at the expense of those needing housing. What could their motives have been?</i></p> <p><i>The second condition is that before any proposed changes to the Island Plan are debated, the States must agree to stabilise the population at an agreed level, and agree the mechanisms to do this. They have to stop bowing to the vested</i></p>	<p>The Minister's proposed change to the definition of Category A homes, which restricts their occupation/purchase by people on or below median incomes will serve to suppress land value.</p> <p>Furthermore, whilst Policy H3 is proposed to be set aside, the Minister's Proposal H3 seeks to ensure that the development value of land will be captured once a suitable mechanism to achieve this is developed.</p>



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			<p>interests of construction, finance, business and land-owners, and actually set a proper policy. Then and only then will there be an end to the otherwise endless process of re-zoning more and still more land for housing. Then and only then will there be any prospect whatsoever of housing all of our people properly without ruining the island for ever. But the ruling group have signalled that they want the opposite.</p> <p>Minister for population Paul Routier is reported in the JEP as saying that there should not be any limit. He says the extra people are needed to help to pay for the ageing population in spite of the official 2009 figures prepared in 2009 for the debate on population levels, which show that their contribution would be insignificant and that other measures are far more important.</p> <p>Our rulers plan to build a new financial district. This amounts to a declaration of intent for yet more people to come in. And in the 2009 population debate Ministers airbrushed 2800 net inward migrants out of existence in the background "information" provided to States members in a shocking case of "making statistics say whatever you want them to say". How do we stop this wilful and shameless pursuit of a policy of endless population growth?</p> <p>A good start would be a fair voting system where every vote counted and where every vote was worth the same. Another would be to refuse your vote to those who voted to continue increasing the population and to those who did not support the land windfall tax. I can send these to anyone interested, the web references are too long! Fairness in our tax system by taxing increases in wealth which are completely unearned and undeserved. An end to the failure to tackle the population issue. And a chance of finally solving our chronic housing problem.</p> <p>These could all be ours if the States wanted it to be so.</p> <p>4 affordable housing The previous policies included making developers include in developments a specified proportion of such homes. The previous COM caved in to industry pressure, saying they could not or would not do this. The Minister should stand up to the special interests and call their bluff. They would rather do this work and survive than put their own existence in doubt and be replaced by other enterprises. In order to do this the Minister might consider initiating a "great debate" on the subject of just what the construction industry is for, and what legitimate profit is.</p>	
			<p>5 Natural environment</p> <p>I could not understand what the highlighting of swathes of this section meant. Is the intention to delete the highlighted sections? There was no clarity.</p> <p>Therefore this part of the consultation must be rerun, as we the public have not understood your intentions and what the planned changes are.</p> <p>I support the toughest protection of the National Park, as was stated in the Plan 2012 and approved by the States and am against any weakening.</p> <p>On a quick read of the Green Zone provisions I feel the same about those too, but as I say it is not clear what the proposed changes are.</p>	<p>The Minister considers that the basis of the change was clearly set out in the supporting information provided with the consultation material.</p> <p>Attached is an extract from (page 2) of the Consultation Paper.</p> <p><i>The basis for the change to different parts of the Plan is summarized below. Further detail is provided in the supporting documents including copies of draft policies and proposals: changes from the 2011 Island Plan are highlighted in yellow in the relevant documents.</i></p> <p>(see: <a href="http://www.gov.je/SiteCollectionDocuments/Government%20and%20administration/IPR1-Information%20about%20review-30.08.13.pdf">http://www.gov.je/SiteCollectionDocuments/Government%20and%20administration/IPR1-Information%20about%20review-30.08.13.pdf</a> )</p>
IR(1) -67	Mr James Godfrey	Royal Jersey Agricultural & Horticultural Society	<p>There has been a documented loss of agricultural land in the island in the order of some 25% from 1970 and it is unsustainable to continue developing green fields. This loss has been attributed to permanent development, reversion of marginal land and change of use out of agriculture.</p> <p>In 2004 the Jersey Environment Forum called upon the States of Jersey, in whom responsibility lies for the protection of agricultural land (through the planning, protection of agricultural land and control of sales &amp; leases laws), to undertake a review of the situation. This review has not been completed and therefore any further loss of agricultural land in the absence of researched data is irresponsible.</p> <p>The RJA&amp;HS contends that there should be no further permanent loss of agricultural land.</p>	<p>The thrust of the Spatial Strategy of the 2011 Island Plan remains unaltered by the Minister's proposed amendments such that most of the Island's development needs should be met from within the existing built-up area: the proposed rezoning of land would, in total, provide about 350 homes out of a total supply of over 3,500.</p> <p>The Minister acknowledges the importance of protecting the countryside and safeguarding agricultural land but has sought to identify those sites which have already been subject to some form of development, albeit for agricultural purposes, on the edge of the existing built-up area as having the most potential to contribute to the Island's housing needs..</p>



Ref	Name	Agent/ Organisation	Reasons for answer	Minister's Response
IR(1) -37	Mr Jason Lees-Baker		Brown field or ex glass house sites should be identified and be developed as a priority over farmed agricultural green field sites.	The Minister acknowledges the importance of protecting the countryside and safeguarding agricultural land but has sought to identify those sites which have already been subject to some form of development, albeit for agricultural purposes, on the edge of the existing built-up area as having the most potential to contribute to the Island's housing needs. Five glasshouse/brown field sites are proposed for re-zoning in the Minister's interim review.
IR(1) -189	Mr John Mesch	Council for the Protection of Jersey's Heritage	1.The Council is concerned at the unreasonably short time made available for this consultation. Documents were made available and accessible only on the Planning Department's website on 5 September 2013 with a closing date only three weeks later on 25 September 2013. Hard copies were not made available at the States bookshop in Mourier House. A loose-leaved, hard copy of the proposed revision document was obtained from the Planning office receptionist at South Hill on 16 September and following a request the remaining hard copy documents were received by post on 19 September 2013. It is recognised generally that a consultation period for States policy documents should be 12 weeks.	The eight week consultation period satisfies the requirements of law and compares favourably with that recent development plan/ national planning guidance consultations undertaken in Guernsey (seven weeks starting at end of July) and UK (six weeks starting end August). The Minister is simply seeking to ensure that the requirement for affordable homes is met as soon as possible, having regard to the due processes of scrutiny and the requirements of the law. The consultation was well-publicised in the public domain and direct to former consultee's email. Material was made available online and in hardcopy formats on 30 July 2013 to 25 September 2013.
			2.It has been impossible during this period to obtain a properly staffed set of comments on the proposed drafts. These comments should be regarded as an interim response only.	Further opportunity to submit material and to comment upon the matters to be discussed will be afforded at the Examination in Public.
			3.The reasons for Deputy Young proposing (P.71/2013) the present piecemeal approach to this revision of the Island Plan are understood. However, in recognising that the Island Plan is the principal, strategic planning document for land use in the extremely limited land-mass available for development in Jersey, it is essential to adopt a coherent and comprehensive methodology in any review and redrafting of the Island Plan.	The thrust of the Spatial Strategy of the 2011 Island Plan remains unaltered by the Minister's proposed amendments such that most of the Island's development needs should be met from within the existing built-up area: the Minister's proposed amendment to the Plan is considered to sit comfortably within the existing strategic framework and that the extent of land proposed for rezoning on the edge of the built-up area is extremely limited.
			The present, fragmented draft lacks the necessary conciseness and clarity of purpose called for. It contains much, unnecessary repetition. For example within the revised 35 pages dealing with Natural Environment and policies NE 6 and NE 7 'landscape' and 'landscape character' is mentioned no fewer than 34 times.	The policies and the pre-ambles to them have been broken down to deal with specific forms of development that might be permissible in the CNP and GZ in an attempt to clearly explain the policy framework that will be applied to a comprehensive range of development types: hence the repetitious nature of the policy. A more concise policy could be adopted but this, it is considered, would lack the necessary clarity and specificity.
			4).It is disappointing that the briefing document fails to explain that the whole purpose of the Island Plan should be to achieve sustainable development. Resolution 42/187 of the United Nations General Assembly defined sustainable development as meeting the needs of the present without compromising the ability of future generations to meet their own needs. It follows that at the heart of the Island Plan should be a presumption in favour of sustainable development. Nowhere in the present drafts is this explained.	The achievement of sustainable development is a major objective of the local planning system and remains a major theme underpinning the Island Plan and its suite of strategic planning policies. Determining sustainable development levels is, however, something much more than assessing total volume of development and or loss of greenfield land. There are many aspects of sustainability that need to be addressed, including: <ul style="list-style-type: none"> <li>- Land use and location (is it the right use in the right place, having regard to the approved 'spatial strategy?');</li> <li>- Transport (is the development accessible by modes other than the car?);</li> <li>- Energy (is the development energy efficient? does it maximise sunlight?, is there provision for renewable energy?)</li> <li>- Waste (do the proposals include good waste management? Has provision been made for recycling and composting facilities? Are there water efficiency measures? Does the project use recycled/reused building materials?)</li> <li>- Community development (is the scheme designed with community safety and access for all in mind? Has there been meaningful consultation with the local community?)</li> <li>- Biodiversity and open environment (Does the scheme protect or enhance the natural environment? Has there been any loss of land or biodiversity? Has best practice been observed in tree protection and planting?)</li> <li>- Built environment (is the scheme on previously developed land? Does it involve the renovation of existing buildings? Is heritage value protected? Does the scheme represent good quality design?)</li> </ul>

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				<p>Does the scheme respect the relationship with neighbouring properties?)</p> <ul style="list-style-type: none"> <li>- Pollution (Does the development cause air, water, land or noise pollution? Is the scheme affected by these pollution problems? Are measures planned to eliminate the pollution problems?)</li> <li>- Human activity (Does the scheme create 'paid employment'? Does it make available commercial and social goods and services for local consumption? Does the scheme support community-based cultural activity?).</li> </ul> <p>The policies in the Island Plan allow for all of these aspects of sustainability to be addressed in planning and deciding upon development proposals. Nearly all of the policies relate either directly or indirectly to sustainable development principles.</p>
			<p>5.The present re-drafting fails to provide the "reasoned justification" for the revised policies covered as required by Planning and Building (Jersey) Law 2002 (Article 5). This legal requirement demands that paragraphs forming the preamble to each statement of policy should be a brief, succinct explanation of the reason for formulating each particular policy.</p> <p>6.The revised sections dealing with policies for the Natural Environment are unsatisfactory in that they provide less clarity than before in explaining the reasons for having each policy. It is essential that statements of policy and their justification are easily understood by applicants and decision makers alike.</p>	<p>The Minister considers that the proposed amendment of the Plan is fit for purpose and satisfies the requirements of Article 5 of the Planning and Building (Jersey) Law 2002.</p>
			<p>7. The over-arching policy in the present plan is the Spatial Policy SP 1.</p> <p>The main justification for this and all other policies is simply that development in Jersey is restricted to the 29,258 acres (66,436 vergées) of its landmass. In 2011 24% of this area was already developed (the comparative figure for mainland UK is less than 9%), with 54% of the Island remaining under cultivation. At present, no attempt is being made to calculate the rate at which remaining land is being lost to development.</p> <p>To achieve truly sustainable development a maximum annual rate of loss of land to development should be calculated and used as the factor providing a sustainable limit on new development each year. (The word 'development' here is used as a noun. Adding the description 'new' or 'old' is not 'tautological' as claimed your briefing paper, page 2, under the heading Clarity, sub-paragraph 2).</p>	<p>The monitoring of the performance of the Plan is important to ensure that its policies are effective and fit-for purpose and the extent of land use cover for a variety of land uses is monitored on an annual basis and reported in the States Annual Report.</p> <p>The Minister does not, however, consider that the change of land use type is a particularly representative indicator of sustainability as it fails to capture social and economic parameters of development or to measure the environmental quality of land use.</p>
			<p>8.The overriding justification for strict policies governing the use of the Island's land which could be used for development is that without such controls the consequence will be: The progressive loss of beautiful coastal and rural landscapes, comprising cultural heritage which characterises the uniqueness of the Island</p> <p>In view of an increasing population and growing problems of global food security the Island should give the highest levels of protection to land capable of cultivation or sustaining livestock. Policy ERE 1- Safeguarding agricultural land - should assume greater importance than it is accorded at present in new plans for re-zoning further areas of green-field land for housing.</p> <p>The progressive loss of Jersey's characteristic architectural styles which fit into the context of existing, attractive streetscapes, particularly those listed as historic buildings.</p> <p>The possible loss of offshore seascapes.</p> <p>In commenting on the previous drafting of the Island Plan (White Paper dated September 2009) the Council strongly recommended that a specific policy on Landscape Protection should be included in the Island Plan.</p> <p>The Council reported that the Council of Europe recommended that governments should shape policies for cultural landscape area conservation within the context of a general landscape policy which is completely lacking in the present Plan. The inclusion of such a policy would remove the need for the numerous, repetitions of</p>	<p>The Minister does not support the introduction a separate policy related to landscape character principally because this already forms the basis of the planning policy for the coast and countryside. See response to NE6 and NE7.</p>

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			reference to 'landscape character of the area'.	
			<p>Housing Forecast housing figures are based on surveys of the unconfined, aspirational future needs of a restricted sample of islanders. Forecasts should be based on an assessment of the calculated, real needs for residential accommodation of all types compared with the present housing stock. It is apparent from properties advertised by Jersey Estate Agents that there is no shortage of housing available for occupation.</p> <p>Before re-zoning green-field land for building, alternative ways of meeting properly quantified housing needs should be examined in detail.</p>	<p>The Minister's proposed amendment which seeks to provide additional housing supply is based on the latest evidence of housing supply, demand and affordability provided by the 2012 Housing Needs Survey (undertaken as part of JASS); the Housing Affordability Report and the latest Residential Land Availability report: the survey results are not, therefore, considered to be entirely aspirational and are qualified with reference with people's ability to realise their aspirations.</p> <p>The sample size is statistically valid and weighted in order that it is representative of the entire population.</p> <p>The decision to provide more affordable and social housing is a key action of the States Strategic Plan 2012.</p> <p>The latest evidence on affordability indicates that open market housing is beyond the reach of many people in Jersey (see: <a href="http://www.gov.je/Government/JerseyWorld/StatisticsUnit/Prices/Pages/HousingAffordability.aspx">http://www.gov.je/Government/JerseyWorld/StatisticsUnit/Prices/Pages/HousingAffordability.aspx</a>)</p>
			<p>In the absence of a full financial explanation of how the concept of 'affordable housing' is to be defined, the Council remains highly sceptical that rezoning more greenfield land , if necessary by invoking compulsory purchase, is either necessary or justified.</p> <p>It is believed that the outcome will result in an inherent unfairness for the majority of Islanders who are not privileged to purchase one of the categorised 'affordable' houses.</p> <p>It order to ensure fairness in the system of allocation of 'affordable' housing it will be necessary to introduce stringent restrictions and conditions for the re-sale of such housing.</p> <p>Rule of Thumb As a rule of thumb, in areas like Jersey where land designated for development is expensive, the commercial costs of building a house is roughly one third for the cost of the land, one third for the building costs with the final third forming the builder's profit. In order to achieve an 'affordable' house the land costs and some of the builder's profits will have to be off-set in some way. This requires detailed examination, before further land is re-zoned for building.</p>	<p>The Minister's proposed amendment to the definition of Category A housing provides a clear definition of what is meant by 'affordable housing'. This is supported by further information contained within the pre-amble to the site assessments (at Appendix B of the Minister's proposed amendment) which sets out the typical values that might be attained for various house types.</p>
			Re-use of Office Accommodation Plans for new office block accommodation in St. Helier and on the Waterfront will inevitably release present office accommodation for re-development and reversion to residential accommodation. An assessment should be made of the result of such re-development on future needs for social and other categories of residential accommodation.	<p>Work has already been undertaken as part of the creation of the 2011 Island Plan to assess the capacity of the town to accommodate development and specifically for outworn sites in the town to contribute towards the delivery of homes through their redevelopment.</p> <p>The assumptions made in carrying out this work are built into the overall estimations of housing land supply.</p>
			<p>Conclusion The very limited time available for the consultation has prevented a comprehensive response to the Minister's request for comments. The revised documents issued as part of this 2011 Island Plan Interim Review are unsatisfactory in their present form. There is no direct reference to sustainable development. The piecemeal approach in which a limited number of policies are selected for review will result in a plan that is fragmented and lacking in coherence. Rather than providing clarity and consistency the present drafts are repetitious and confusing. The needs for housing in the various categories should be assessed against predicted, real needs, not aspirations, before attempts are made to re-zone green-field land for residential development.</p> <p>Once again, it is strongly recommended that the Island Plan should include a policy on landscape protection. It is further strongly recommended, therefore, that the present drafts are withdrawn for further revision and consultation at a later</p>	<p>Comments noted and responded to above.</p>

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			date.	
IR(1) -173	Mr M Cotillard	Jersey Construction Council	As stated earlier, the Jersey Construction Council supports the re-zoning of the sites contained within the revision document, but does not support the use of compulsory purchase powers.	<p>The use of compulsory purchase would only be used where, in the event of re-zoning, the sites did not come forward for development during the lifetime of the Plan: the decision to proceed with compulsory purchase proceedings would require a separate decision of the States as prescribed by the requirements of law.</p> <p>It is relevant to note that three of the four landowners are, on the basis of evidence submitted as part of this consultation, clearly willing to support the zoning of their land for this purpose, with the position of the fourth landowner remaining to be clarified.</p> <p>It is considered that the sites remain viable for the development of affordable homes and that, in the event of their being rezoned, would deliver much-needed affordable homes without the requirement to consider the use of compulsory purchase powers.</p>
			The Council further believes that each site owned by the States of Jersey should be considered upon its individual merits, and its value maximised for the benefit of all Islanders, particularly where a high value site becomes available, its maximum potential should be utilised. This potentially could involve the selling off of that site to the private sector for mixed housing, raising much needed funding that could be used to purchase larger sites suitable for affordable housing, providing a greater benefit for all Islands residents	The States of Jersey is using its property portfolio in the manner described. That is, balancing the needs of the community with the release of some sites for affordable housing (e.g. ambulance station site), whilst using other assets to maximise commercial values to meet other needs (e.g. waterfront office development).
			Policy E1, the employment land policy, was introduced exactly at the time that the Island went into recession and the Jersey Construction Council believes that this policy is an obstacle to the provision of housing stock within the Island and it should be removed from the Island Plan.	<p>Policy E1 is an important policy within the 2011 Island Plan as it ensures that the supply of employment land is retained, where relevant to do so. This is important to help the Island recover from recession by ensuring the availability of land and buildings that can support employment uses.</p> <p>It does not preclude land and buildings being taken out of employment use: it just requires applicants to demonstrate that the site is no longer required for employment use.</p> <p>Being a test based policy, it has proven to be flexible, with some sites being retained and providing much needed additional employment opportunities on the Island (e.g. Iceland, St. Peter), whilst allowing other more unsuitable sites to be released for other uses such as housing (e.g. Les Sapins Glasshouses, Boulivot).</p> <p>Policy E1 and the supporting guidance, is to be reviewed by the Minister in accord with P.71/2013. The findings of this work will determine whether further review of Island Plan policies are required.</p>
			We believe that policies which incur cost to developers such as the percentage for art scheme should also be removed in these recessionary times, where obtaining funding for development projects is to say the least difficult.	<p>The provision of Percent for Art under Policy GD8 of the 2011 Island Plan is not mandatory but is encouraged on major schemes to support place-making and the development of community and local identity in accord with the States Cultural Strategy and the objectives of the Island Plan.</p> <p>It is outwith the scope of this interim review but will be considered as part of the Minister's obligations under the auspices of P.71/2013.</p>
IR(1) -43	Mr Marc Burton	Institute of Directors	<p>Policy E1 – given the current economic conditions this policy is counter-productive and should be removed to help assist in the housing needs requirements.</p> <p>The island plan is in danger of severely failing in the delivery of affordable homes in its first five years and the employment land policy can only further the slow rate of delivering housing.</p>	<p>Policy E1 is an important policy within the 2011 Island Plan as it ensures that the supply of employment land is retained, where relevant to do so. This is important to help the Island recover from recession by ensuring the availability of land and buildings that can support employment uses.</p> <p>It does not preclude land and buildings being taken out of employment use: it just requires applicants to demonstrate that the site is no longer required for employment use.</p> <p>Being a test based policy, it has proven to be flexible, with some sites being retained and providing much needed additional employment opportunities on the Island (e.g. Iceland, St. Peter), whilst allowing other more unsuitable sites to be released for other uses such as housing (e.g. Les Sapins Glasshouses, Boulivot).</p> <p>Policy E1 and the supporting guidance, is to be reviewed by the Minister in accord with P.71/2013. The findings of this work will determine whether further review of Island Plan policies are required.</p>



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			<p>Pre-application advice – one key element missing from the above concerns pre-application advice. This maybe outside the remit of the Island Plan Review but is a key require for the future of the planning system.</p> <p>It is imperative to the construction industry that formal and legally binding pre-application advice is provided to enable a clearly understanding between developers and the planning department to be established to provide successful developments going forward.</p> <p>The current system is unviable, unworkable and undeliverable to meet the current day requirements and requires urgent action to ensure a viable industry to meet the requirements of the 2011 Island Plan.</p>	<p>This is not a planning policy matter and is outside the scope of the interim review.</p> <p>The Minister has, however, recently published revised guidelines on pre-application advice which will provide more certainty to the construction and development industries.</p>
IR(1) -130	Mr Paul Harding	BDK Architects	<p>We note the states Assembly supported P.71/2013 requesting you to review the following Policies which have not been addressed in this Interim Review:- ERE7 Derelict and Redundant Glasshouses; SP5 Economic Growth and Diversification; E1 Protection of Employment land; SP1 Spatial Strategy, for settlements outside the main built-up area; GD3 Density of Development; SCO6 Allotments; GD8 Percentage for Art.</p> <p>We appreciate review of these Policies may not have been feasible in the available time period, but would urge you to bring forward a further review of these Policies at the earliest possible moment.</p>	<p>The Minister is required, under the auspices of P.71/2013, to determine whether other parts of the Plan require revision and will report his findings on this matter as soon as he is in a position to do so.</p> <p>Any proposal to further revise the Plan will require a sound and convincing justification.</p>
IR(1) -226	Mrs Celia Jeune	The National Trust for Jersey	<p>The National Trust does not feel that it is neither desirable nor appropriate to revise the 2011 Island Plan for the following reasons:</p> <p>The Island Plan is only two years old and was adopted by the States of Jersey at the end of June 2011 after numerous amendments and two weeks of debate. The existing policies were subject to extensive review and public consultation including an independent review by Planning Inspectors.</p> <p>To now seek to amend those policies, a mere 24 months into the life of the plan, without a similar high level of consultation and scrutiny amounts to revising the plan through the backdoor and undermines the whole process of developing and implementing a long term planning policy in a transparent, rigorous and cohesive manner.</p>	<p>The Minister is not seeking to amend the entire Plan and is only proposing change where it is considered necessary.</p> <p>Of 140 policies in the current Plan, 11 are proposed for revision at this time, six of which are related to the matter of housing. Most importantly, the strategic framework for the existing Plan remains unchanged, and the proposed revisions are, in the view of the Minister, entirely consistent with this framework.</p> <p>The independent planning inspectors, who will review the proposed changes, will be asked to comment on whether the proposed changes sit comfortably with the existing document.</p> <p>The Minister's proposed changes will be subject to similar levels of scrutiny to the original 2011 Island Plan, as prescribed by law. This will involve public consultation and an examination in public, conducted by independent planning inspectors, before the matter is considered by the States Assembly. Because of this process of scrutiny it is not envisaged that the States will debate any proposed changes to the Plan until May/June 2014.</p>
			<p>The Minister is currently examining the efficacy of the other 2011 Island Plan policies and has stated that this may result in a further interim review. The National Trust finds it difficult to see how such a piecemeal approach to such an important issue is either desirable or practical.</p> <p>It also seems at odds with our Government's overall strategy of seeking greater efficiency and reducing department expenditure.</p>	<p>The States has endorsed Deputy Young's proposition (P.71/2013) which requires the Minister to review whether other parts of the Plan warrant revision. The Minister is, thus, committed to do this and will report back as to whether, once his investigations are complete, further amendment of the Plan is considered to be necessary.</p> <p>The Island Plan needs to remain up-to-date, fit-for-purpose and needs to be responsive to changing circumstances.</p>
			<p>The Minister has sought to justify his proposed revisions so as to ensure the Island Plan remains up-to-date and fit-for-purpose. The Trust cannot concur with such justification when the plan was written for a 10 year period and is a mere 24 months old.</p> <p>It is also stated that the principal driver for change is the delivery of affordable homes but as the Minister will be fully aware this could be achieved through the States Assembly approving the re-zoning of sites subject to specific planning conditions as opposed to amending policy.</p>	<p>The main driver for change is the need for affordable homes in the Island. One of the policy mechanisms that was approved by the States in June 2011 to deliver affordable homes – Policy H3 – has not been implemented. The Plan, as it currently stands, is thus unable to fulfil the objective of meeting this need and, as a consequence, new policies are needed to address the anticipated shortfall.</p> <p>In addition to this, the Island's housing situation has changed since 2011 and the Minister is seeking to ensure that the planning system responds to the latest information about housing needs and affordability.</p> <p>In bringing these proposed changes forward, the Minister is responding to a clear need and is supported by the Minister for Housing and other ministers in so doing.</p> <p>The suggestion that the Minister could address the matter of delivering affordable homes, without amending the Plan, by the re-zoning of sites through the States Assembly is flawed and misconstrued. Firstly, any such report and proposition would not benefit from the process of consultation and independent scrutiny which the NTfJ seeks to ensure. And most importantly, any such proposal would, in essence, amount to an amendment of the Plan and can only be delivered through the processes that the Minister is adopting as prescribed by law.</p>



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			<p>The layout of the consultation document outlining the proposed amendments is complex and not easily accessible. It would considerably benefit from a more simple format clearly illustrating the differences between existing and proposed policies. This would then enable the general public to make fully informed decisions without having to wade through both plans in order to assess the implications of the amendments.</p> <p>Due to inadequacy of justification and process The National Trust for Jersey is unable to support the principle of this Island Plan interim view and sincerely hopes that the independent inspector will find likewise.</p>	<p>The proposed amendment has sought to highlight where change has been made and the justification seeking change is set out in the associated briefing papers.</p> <p>The subject is relatively complex and has been set out in as clear and accessible matter as possible.</p> <p>The Minister is open to constructive suggestion as to how the process might be made simpler to understand.</p>
IR(1) -180	Mr Peter Seymour	Mortgage Shop	<p>Discussion in respect of Affordable Housing has been an ongoing theme in the Island for many years with a history of under provision which has severely jeopardised Islanders in the lower income brackets from being given the opportunity of becoming property owners.</p> <p>The recently introduced Deposit Loan Scheme is most likely to be underfunded and, if it were to be extended, could easily result in increased house prices in the Island to the disadvantage of the very people who it was intended to help.</p> <p>The sale of property to states tenants whilst being most successfully in the early stages, has virtually ground to a halt whilst on some of the village schemes it would still appear that houses are being allocated to the wrong people as first time buyers.</p> <p>Redundant glass house sites in locations such as St Clement and Grouville are crying out to be developed and could yield a significant number of units, although the impact on the infrastructure of the parishes will be significant and their rezoning will be strongly resisted by residents of the two parishes.</p>	Comments noted.
			<p>The Interim Plan should look further than the short to medium term and should also include a list of reserve rezoned sites that can be released as soon as the need arises and certainly to replace any of the earlier sites that do not show any sign of delivering.</p>	<p>The Minister considers that the proposed amendment to the 2011 Island Plan is sound and will ensure an adequate supply of homes to meet the anticipated demand over the remainder of the Plan period.</p> <p>Proposed levels of provision would provide a 6% buffer of overall housing supply.</p> <p>The thrust of the Spatial Strategy of the 2011 Island Plan remains unaltered by the Minister's proposed amendments such that most of the Island's development needs should be met from within the existing built-up area and the Minister is keen to ensure that development activity remains primarily focussed on existing built-up areas of the Island.</p> <p>On the basis of the above, the Minister does not consider it necessary and/or desirable for a reserve list of sites to be prepared.</p>
			<p>The development of the Waterfront and Esplanade areas will result in any number of commercial or office sites becoming available for redevelopment within the town centre and on its periphery. I recall that your predecessor had identified these areas as being suitable for conversion to residential use and as a consequence they should also be identified and included in the Plan.</p>	<p>The existing 2011 Island Plan already encourages the conversion redevelopment of outworn commercial space in the Built-up Area, which is further supported by the Minister's publication of masterplanning and supplementary planning guidance.</p>
			<p>In the past, the criticism has always been that property owners seeking over inflated prices for rezoned land has meant that sites have not been available and I would suggest that as a means of controlling prices The States should consider whether the compulsory purchase powers that were originally vested in the Island Development Committee might not be utilised for the purpose of acquiring sites where an amicable agreement cannot be reached.</p> <p>I am sure that most of these sentiments have been expressed previously although the more people who provide you with input will surely help your case in representing proposals to The States.</p>	<p>Comments noted.</p> <p>The use of compulsory purchase powers is already included in the Minister's proposed amendment to Policy H1.</p> <p>The use of compulsory purchase would only be used where, in the event of re-zoning, the sites did not come forward for development during the lifetime of the Plan: the decision to proceed with compulsory purchase proceedings would require a separate decision of the States as prescribed by the requirements of law.</p> <p>It is relevant to note that three of the four landowners are, on the basis of evidence submitted as part of this consultation, clearly willing to support the zoning of their land for this purpose, with the position of the fourth landowner remaining to be clarified.</p>

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IR(1) -23	Mr Peter Thorne		<p>The proposed designation of sites for affordable housing is welcome - it gives us a chance to meet housing requirements. However, there is every reason to believe that the former opposition to the Samarès Nursery, Longueville Nursery and the Le Quesne Nursery will become a significant obstacle to achieving the full requirement - and once again the Island Plan will fail to meet its housing targets. I consider that sites which have previously been considered by Planning, and which appeared in Policies H3 and H4 should be reviewed.</p> <p>I also wish to have the attached document considered by the Minister, if the need for other sites becomes necessary.</p>	<p>The Minister considers that the proposed amendment to the 2011 Island Plan is sound and will ensure an adequate supply of homes to meet the anticipated demand over the remainder of the Plan period. Proposed levels of provision would provide a 6% buffer of overall housing supply.</p> <p>The thrust of the Spatial Strategy of the 2011 Island Plan remains unaltered by the Minister's proposed amendments such that most of the Island's development needs should be met from within the existing built-up area and the Minister is keen to ensure that development activity remains primarily focussed on existing built-up areas of the Island.</p> <p>On the basis of the above, the Minister does not consider it necessary and/or desirable for a reserve list of sites to be prepared.</p>
IR(1) -122	Mr Peter Troy	Troy Development s Ltd	<p>The current Green Zone area should be reduced in size by at least 20% as restricting new development to St Helier will cause social problems due to overcrowding and lack of amenity space in the town area.</p> <p>It must be the responsibility of ALL parishes to facilitate and support family homes within the Parish as family living is significantly enhanced in the countryside.</p>	<p>The spatial strategy, which inherently protects green fields and open spaces from development, is not included in this interim review and neither is the definition of Green Zone boundaries.</p> <p>The thrust of the Spatial Strategy of the 2011 Island Plan remains unaltered by the Minister's proposed amendments such that most of the Island's development needs should be met from within the existing built-up area and the Minister is keen to ensure that development activity remains primarily focussed on existing built-up areas of the Island.</p>
IR(1) -26	Mrs Judy Martin		<p>look ok but would like to find out what happened to field 1219 in St Helier and the plans to give land to the school so they could build</p>	<p>The western half of Field 1219 is already safeguarded for educational use as part of Policy SCO1 in the 2011 Island Plan to address deficiencies in the level of play space available to Haute Vallee School.</p> <p>This remainder of field, which is presently designated as Green Zone, has been proposed by the site owner as a potential site for affordable housing. This proposal will need to be reviewed again as part of this interim review: the Minister is not presently minded to amend the Plan to zone it for this purpose (see: Suitability for housing assessment report: site H1: rep IPR(1) - 149)</p>
IR(1) -204	Mrs Sue Lissenden		<p>The Island Plan was intended to last 10 years. A large and inclusive document, it was accepted as a step forward towards good planning. To change it within so short a period of time does not indicate good government, indeed it might be considered to appear from disorderly thinking.</p> <p>The island may well be short of affordable housing, but there are other ways to deal with that problem without making a problem for another department, namely that of The Environment.</p> <p>Has anyone done a survey of the houses now empty and ascertained the cost of putting these in good repair? That's just one idea. Please leave the island plan alone.</p>	<p>The current review is brought to ensure that the Plan remains up-to-date, clear, comprehensive and capable of meeting current requirements: this is primarily driven by the need to provide more affordable homes.</p> <p>The decision to provide more affordable and social housing is a key action of the States Strategic Plan 2012 to meet the needs of the Island's community.</p> <p>The latest evidence on affordability indicates that open market housing is beyond the reach of many people in Jersey (see: <a href="http://www.gov.je/Government/JerseyWorld/StatisticsUnit/Prices/Pages/HousingAffordability.aspx">http://www.gov.je/Government/JerseyWorld/StatisticsUnit/Prices/Pages/HousingAffordability.aspx</a>)</p> <p>One in fourteen private dwellings (7%) were vacant at the time of the 2011 Census in Jersey (cf. 6% in 2001). Although there was no requirement for householders to give reasons for properties being vacant, some reasons were provided for around half of properties listed as vacant.</p> <p>Over a quarter (29%) were vacant due to being between tenants, and nearly a quarter (23%) were second or holiday homes. Around one in five were in the process of being built or renovated.</p> <p>On this basis, together with the fact that not all of these homes are suitable for affordable housing needs, the potential available vacant stock of housing could not be viably used to meet the current affordable housing shortage.</p>

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IR(1) -181	Vivien Vibert		<p>I have serious reservations about this proposed review, which comes so soon after the finalisation of the 2011 Island Plan into which much consideration was given by members of the States and public.</p> <p>Your press releases have downplayed its effects, by saying the changes are few, minor and to enable affordable housing to be built, and in your Consultation paper marked "July 2013" (no actual date) where the scope is described as "limited to a small number of policies and proposals". This is simply not the case: 13 Policies and Proposals are listed, and some of them involve massive changes, for example the preamble paragraphs preceding Policy NE6 used to be sixteen in number but are now sixty one and this on a crucial aspect of the Island Plan which should have little to do with the provision of affordable homes.</p> <p>The material runs to several hundred pages and many documents are dated as late as 30 August 2013; to expect the public and States Members to give considered representations in the time allowed is absurd and does a great disservice to the Island and those who endeavour to act in its best interests.</p> <p>The on-line questionnaire, even if intended to be helpful, cannot be sensibly answered as one cannot say Support/Object to a page or more of definitions and propositions, specially as the material there is abbreviated from the other documents. Given the time constraints and the volume of material, I will only make brief comments on each heading listed in the Consultation Paper:</p>	<p>The eight week consultation period satisfies the requirements of law and compares favourably with that recent development plan/ national planning guidance consultations undertaken in Guernsey (seven weeks starting at end of July) and UK (six weeks starting end August).</p> <p>This is simply the first stage of the consultation and scrutiny process involved in a review of the Island Plan: further scrutiny of the proposals will follow which will also enable further engagement and contribution from interested parties.</p> <p>The Minister is simply seeking to ensure that the requirement for affordable homes is met as soon as possible, having regard to the due processes of scrutiny and the requirements of the law.</p> <p>The proposed amendment has sought to highlight where change has been made and the justification seeking change is set out in the associated briefing papers.</p> <p>The subject is relatively complex and has been set out in as clear and accessible matter as possible.</p> <p>The Minister is open to constructive suggestion as to how the process might be made simpler to understand.</p>
			<p>Proposal 2 0: Provision of homes</p> <p>The document relating to this turns out to be "Affordable Housing Definition". Highlighted as amended or added are paragraphs 6.11 to 6.14 but earlier paragraphs have also been amended, but this is not shown.</p> <p>The highlighted areas do not give a better definition of affordable housing than the present paragraphs, but the proposition that innovative building methods should be used is to be welcomed.</p>	Comments noted.
			<p>H1: Category A housing sites Why has current 6.95 (potential for the Esplanade Quarter as affordable housing) been deleted? There is no indication of this, the re-numbering of paragraphs make it very difficult to identify, which can only be done by a thorough examination - impossible to do for the whole review in the time available, so who knows what amendments are escaping attention. Are the four sites referred to in para 6.99 the same ones as listed in Policy H1? If so, why not say so, and if not what are they?</p> <p>The reference to reviews suggests that this is a fait accompli, but whether these areas should be rezoned must be part of the consultation itself.</p> <p>There seems to be no mention of identifying properties in the town which could be used for affordable housing, some of which could be high-rise. Also buildings which are used as offices, though once houses a century ago, are no longer suitable for modern offices. These could be turned back into housing.</p>	<p>The Minister's proposed amendment of the 2011 Island Plan remains to be considered by independent planning inspectors and the Minister will weigh the views of the inspectors and those who have submitted representations before submitting a revised draft Plan for approval by the States.</p> <p>The thrust of the Spatial Strategy of the 2011 Island Plan remains unaltered by the Minister's proposed amendments such that most of the Island's development needs should be met from within the existing built-up area and the Minister is keen to ensure that development activity remains primarily focussed on existing built-up areas of the Island.</p> <p>The existing 2011 Island Plan already encourages the conversion redevelopment of outworn commercial space in the Built-up Area, which is further supported by the Minister's publication of masterplanning and supplementary planning guidance.</p>

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			<p>H2: Other Category A affordable sites</p> <p>The document relating to this is entitled "Previously zoned Category A housing sites". Current paragraphs 6.102 to 6.105 have all been amended or deleted, but this is not indicated in the review document, which incorrectly shows new 6.103 and 6.104 as being unamended.</p> <p>If sites are suitable for affordable housing because they are in already built-up areas and private owners have other ideas, then rezoning and compulsory purchase is-probably the right step. However, it is of serious concern that the built-up areas are in the south of the island where there is also some of the best growing areas. Sites such as La Providence, a fertile sunny slope, are lost to agriculture.</p> <p>Improved "joined-up" government would do more to control immigration because the more housing that is provided, the more people are likely to come, and the Island simply cannot take an ever-increasing population.</p>	<p>The thrust of the Spatial Strategy of the 2011 Island Plan remains unaltered by the Minister's proposed amendments such that most of the Island's development needs should be met from within the existing built-up area and the Minister is keen to ensure that development activity remains primarily focussed on existing built-up areas of the Island, which are predominantly in the south - east of the Island.</p> <p>The Minister acknowledges the importance of protecting the countryside and safeguarding agricultural land but has sought to identify those sites which have already been subject to some form of development, albeit for agricultural purposes, on the edge of the existing built-up area as having the most potential to contribute to the Island's housing needs.</p> <p>The Island Plan simply seeks to respond to the direction provided by the States Strategic Plan and does not determine policy related to population and immigration.</p>
			<p>Policy H5: Affordable housing in rural centres Again, the amendments are considerable and would need further analysis and probably consultation with relevant parishes, though the proposals seem reasonable.</p>	<p>Comment noted.</p>
			<p>In conclusion, although there are some good ideas in these proposals, they indicate that the Minister and his department has put developers, the construction industry and the desire for bigger smarter mansions above the protection of the coastal zone and the countryside, as these have been watered down in NE6 and NE7.</p>	<p>Comments noted but not accepted.</p>
IR(1) -230	Monsignor Nicholas France	Maurice Dubras	<p>Please accept these brief preliminary comments on behalf of the Catholic Church in Jersey, made through me for Monsignor Nicholas France, Dean.</p> <p>The Catholic Church in Jersey is seriously concerned about the significant shortfall in truly affordable housing for the workforce which the Island has been attracting for some years, particularly for the agricultural, tourism and service industries.</p> <p>When many of his parishioners are struggling to maintain sufficient income with up to three jobs in order to pay very high rents in exchange for the poor quality and inadequate capacity of what is truly sub-standard accommodation available, what chance have they got to aspire to so-called affordable housing being anticipated by the re-zoning of both green- and brown-field sites.</p> <p>The Church had understood that the Plan as passed by the States of Jersey in 2011 had taken into account the needs of such long-term residents and so is somewhat surprised at the need now to revisit the Island Plan. Clearly, to-date the supply of low-cost quality homes of all types at the low end of the market has not been sufficient to meet the demands and aspirations of its lowest-paid residents. We all need to understand better why this has occurred.</p>	<p>The decision to provide more affordable and social housing is a key action of the States Strategic Plan 2012 to meet the needs of the Island's community.</p> <p>The latest evidence on affordability indicates that open market housing is beyond the reach of many people in Jersey (see: <a href="http://www.gov.je/Government/JerseyWorld/StatisticsUnit/Prices/Pages/HousingAffordability.aspx">http://www.gov.je/Government/JerseyWorld/StatisticsUnit/Prices/Pages/HousingAffordability.aspx</a>)</p> <p>The main driver for change to the 2011 Island Plan, the subject of the Minister's proposed revisions, is the need for affordable homes in the Island. One of the policy mechanisms that was approved by the States in June 2011 to deliver affordable homes – Policy H3 – has not been implemented. The Plan, as it currently stands, is thus unable to fulfil the objective of meeting this need and, as a consequence, new policies are needed to address the anticipated shortfall.</p> <p>In addition to this, the Island's housing situation has changed since 2011 and the Minister is seeking to ensure that the planning system responds to the latest information about housing needs and affordability.</p> <p>In bringing these proposed changes forward, the Minister is responding to a clear need and is supported by the Minister for Housing and other ministers in so doing.</p>
			<p>While the Church applauds the recent renovations and improvements made to much of the public housing stock and it appreciates the value of maintaining the Island's open spaces and natural environment, it believes that more has to be done to enable sufficient new homes, whether apartments, bungalows or houses to be built, preferably within the built-up areas, to bring the cost of owning and renting a home within the reach of many of the island's poorest residents, regardless of their beliefs or of no belief. It is a matter of social justice.</p> <p>Surely this is more important at this time than continuing to plan and build office accommodation which will attract even more workers and make an already difficult situation much worse?</p>	<p>The Minister's proposed amendment of the 2011 Island Plan remains to be considered by independent planning inspectors and the Minister will weigh the views of the inspectors and those who have submitted representations before submitting a revised draft Plan for approval by the States.</p> <p>The thrust of the Spatial Strategy of the 2011 Island Plan remains unaltered by the Minister's proposed amendments such that most of the Island's development needs should be met from within the existing built-up area and the Minister is keen to ensure that development activity remains primarily focussed on existing built-up areas of the Island.</p> <p>The Minister has to ensure that the Island Plan is able to respond to Jersey's social, economic and environmental needs and objectives and to plan comprehensively and in an integrated way: the Minister believes that the proposed amendments to the Plan achieve this.</p>



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			<p>The Church is aware that many of the sites being considered result from the demise of former horticultural enterprises, which now results in ugly brown-field disused glasshouses. Consideration must be given also to other so-called brown-field areas before green fields more appropriate for food supply are lost for ever.</p> <p>We have not had time to study the proposals in detail, for the reasons given above, and it is our intention to complete our review of the Minister's proposals by the end of October after which time we will submit further comment for your consideration. We hope that you will offer us the opportunity to make a submission to the Public Inquiry which is part of the Review process.</p>	<p>The Minister acknowledges the importance of protecting the countryside and safeguarding agricultural land but has sought to identify those sites which have already been subject to some form of development, albeit for agricultural purposes, on the edge of the existing built-up area as having the most potential to contribute to the Island's housing needs.</p>
IR(1) – 232	Mr Michael Dun		<p>Before and during the Island Plan Review – Examination in Public - I devoted weeks of my time preparing submissions and attending the meetings. I addressed the Inspectors on several occasions. The main – but not only – focus of my concern was with the abysmal inadequacy of the proposed “Housing” section of the Proposed Island Plan.</p> <p>I pleaded with the Inspectors to recommend that the whole Plan should be aborted until such time as the “Housing” part might be reconsidered and rewritten. Or, at the very least, the Housing section should be extracted and reconsidered if the remainder of the Plan were to proceed.</p> <p>The whole Plan had been prepared in advance of the Census taking place or the results analysed and it was visibly defective being based on out of date statistics. Of course, my pleas were disregarded. Yet it is now absolutely clear that the Housing proposals in the Island Plan are, as I predicted, totally inadequate and they are being re-considered just two years later.</p>	<p>The Minister is grateful to those who engage with the plan-making process and is appreciative of the time and effort given in the submission of representations: these are, of course, not disregarded but are given careful consideration by the Minister, as well as being subject to independent scrutiny, by inspectors.</p> <p>The Minister is under a legal obligation to ensure that the Island Plan is reviewed at least every 10 years and, in preparing the 2011 Island Plan, was seeking to ensure that the planning policy framework previously provided by the 2002 Island Plan, was updated to accord with this legal obligation.</p> <p>The plan-making process needs to respond and employ the best available evidence at any one time: it will always be the case that new data will be forthcoming in the future. Where data of fundamental significance emerges and/or policy changes in response to that, which cannot be adequately dealt with within the approved planning policy framework, then it is incumbent upon the Minister to propose revision to the Plan to ensure that the Plan remains up-to-date and fit for purpose.</p> <p>The Minister's proposed amendment which seeks to provide additional housing supply is based on the latest evidence of housing supply, demand and affordability provided by the 2012 Housing Needs Survey (undertaken as part of JASS); the Housing Affordability Report and the latest Residential Land Availability report. The most recent Census data has been used to inform household projections. The Island Plan simply seeks to respond to the direction provided by the States Strategic Plan and does not determine policy related to population and immigration.</p>
			<p>Last week I attended the latest Scrutiny Panel meeting where the current Housing Minister explained that his “waiting list” for known families had grown to over 700 families needing “social housing” and the delivery of potential building sites was not going to meet any known demand.</p> <p>Many of these were people needing “accessible” housing due to their disabilities but no attempt has ever been made in Jersey to quantify the actual numbers who might require such accommodation. Yet the Health Minister is currently peddling a wholesale reform of services that includes a policy of the sick and aged “caring for themselves in their own homes”. It is of course meaningless PR speak without a supportive Island Plan based upon research.</p> <p>In fact, the Housing Department (soon to be scrapped) has no overall knowledge about supply and demand for housing in Jersey because the largest sector – that of private housing provision – is not monitored in any way. There simply is no reliable information about the vast majority of Jersey residents who have not appeared on the “social waiting list” of the Housing Department.</p> <p>Even that list is wholly defective because it precludes most married couples less than 50 years of age without children or single young people under 25 etc and of course the Department has no legal responsibility to house anybody at all, no matter how desperate might be their need.</p> <p>That there is no supply of “affordable housing” in Jersey and how this is related to the absurd housing control laws or other discriminatory policies ought to be the subject of examination. Unfortunately, this Island government prefers to proceed on the basis of no knowledge.</p> <p>So the whole history of housing provision is based upon totally inadequate and misleading information so far as those with “qualifications” are considered.</p>	<p>Since 2007 all new homes in Jersey have been built to local Lifetime Homes standards (amended in 2012), which includes improved provision for access to, use and adaptation of dwellings to better meet the requirements of an ageing society and which better enables people to remain in their own homes for as long as possible: this is required through Building Bye-Laws.</p> <p>The Minister's proposed amendment which seeks to provide additional housing supply is based on the latest evidence of housing supply, demand and affordability provided by the 2012 Housing Needs Survey (undertaken as part of JASS); the Housing Affordability Report and the latest Residential Land Availability report. The most recent Census data has been used to inform household projections. All of these data sources deal with the overall housing situation and include reference to ‘qualified’ and ‘unqualified’ households.</p>



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			<p>Yet even more extraordinary is that 10,000 working adults (about one fifth of the entire working population) are entirely excluded from the so called Social housing list or meaningful consideration under the Island Plan.</p> <p>Although I pleaded with the Planning Inspectors that the Plan made no provision for the "unqualified" - and they included a limp note to acknowledge this in their final Report – the planners have (as always) ignored the needs of the 10,000 and the Housing Minister was not even asked about them at last week's Scrutiny hearing referred to above.</p> <p>Yet the Health and Housing Departments have published proposals that will supposedly give security of tenure to all tenants and lodgers (qualified or not) besides minimum standards of accommodation whilst the Island Plan includes no indication how such reforms might be achieved.</p> <p>The 10,000 "without qualies" are like a tribe that does not exist – yet it is they who hold the economic key to proving the rents and mortgages that Jersey housing market needs to fund new housing developments. Of course, it is just another part of the discrimination scandal that their "rents" fill the pockets of the privileged rentiers and property owners who extract probably £30 millions or more each year from this sector (which includes a substantial – but unmeasured – contribution from "public taxes" in the form of "rent rebates" from the Social Security Income Support fund).</p> <p>A previous Island Plan offered the extraordinary excuse that the Island's building industry was too small so that any attempt to end the housing shortage for those "without qualies" must be put off for another day. But now that the building sector is screaming out for new projects, nobody suggests that building homes for those without "qualies" might be a realistic and necessary option.</p>	<p>The Island Plan seeks to make provision to meet the Island's overall housing requirements and to ensure that the standard of accommodation for all new residential development meets the Minister for Planning and Environment's basic standards (see Policy H8 and pre-amble of 2011 Island Plan).</p> <p>Matters of security of tenure and rent levels are outwith the legal ambit of the Minister for Planning and Environment.</p>
			<p>At its root in the 1949 Housing Law, the current housing problems are based upon prejudice and discrimination wrapped up in concepts such as "bona fide residents" which government departments seem determined to perpetuate. This in spite of the Jersey Court Judgement re BBC v Housing Committee (1980) which decided that the use of Housing Control Laws to attempt to control "immigration" were illegal.</p> <p>Unfortunately, it is a judgement that does not fit in with the prejudices of our planners or others and so it has been ignored. As I write the Jersey Institute of Directors and other are joined in a call for more constraints upon "immigrants," yet nobody is demanding equitable treatment for the 10,000. The prejudice is very deep-seated but should form no part of an "island Plan" produced by so called professionals.</p> <p>The Island Plan should be scrapped and, at least, re-written to embrace the several hundred International Conventions that it mentions – but only in passing – in its opening paragraphs.</p>	<p>Administration of housing legislation is outwith the legal ambit of the Minister for Planning and Environment and not an Island Plan issue.</p> <p>The Island Plan seeks to make provision to meet the Island's overall housing requirements and to ensure that the standard of accommodation for all new residential development meets the Minister for Planning and Environment's basic standards (see Policy H8 and pre-amble of 2011 Island Plan).</p> <p>The Island Plan's response to the Island's accession to international conventions was considered at the last EiP (see Inspectors' report, Vol. 1, p.5, para 1.23).</p>
			<p>This lack of joined-up thinking between the various States Departments is of a world leader standard in incompetence yet it is abundantly obvious that the Housing Minister and several others do not even engage in meaningful discussions with the Environment Minister. Even the Constables are excused from the absurd Housing Department's "Gateway" scheme for the allocation of homes in their Parishes in spite of this supposedly being an "all Island" programme.</p>	<p>The Minister's proposed revisions to the Island Plan have engaged other Ministers and their departments.</p> <p>Whilst not a matter for the Island Plan, the Housing Gateway seeks to provide a definitive assessment tool for housing need across the Island.</p>

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			<p>Yet, as I have explained with monotonous regularity the Island Plan is also fixated upon the preservation of "Green Countryside" where cows and the stinking rich have an absolute priority over most humans and their diverse housing needs. Except of course that there is a discriminatory exception where the few hundreds cowhands and other "agricultural" workers are concerned so that developments permissions may be granted for them to be housed "in the countryside" in spite of the lack of any practical, supportive reasons in the 21<sup>st</sup> century.</p> <p>Why "farm-workers" have a prior call for a home in the countryside whereas they are engaged in a diminishing industry of little economic value to the Island is a total mystery. It is another mystery why Planners allow "portacabins" and other supposed "temporary" accommodation to remain in use whereas these are clearly sub-standard, permanent homes.</p>	<p>It is a purpose of the Planning and Building Law to 'conserve, protect and improve Jersey's natural beauty, natural resources and general amenities, its character, and its physical and natural environments'.</p> <p>The provision of key agricultural worker accommodation is dealt with by Policy H9 of the 2011 Island Plan which is not proposed for review, but which addresses the issue of housing standards.</p>
			<p>At the same time, the existing built-up areas - notably of St Helier – are being turned into a ghetto in accordance with some absurd belief that the vast majority of the population should not live in the northern half of the Island.</p> <p>Yet even the policy to release the assumed 500 units of unused living accommodation over shops and other commercial premises in St Helier - included in a previously inadequate Island Plan - has not been followed.</p> <p>Similarly, most of the special action areas in or adjacent to St Helier identified in several previous Island Plans have also not been progressed or adequately resourced.</p> <p>Yet the current grandiose schemes to build enormous "finance centre" developments on the "Waterfront" will cause much of the commercial centre of St Helier to fall into further dereliction.</p> <p>The "office to let" or "shop to let" signs will proliferate and the "ghetto-isation" of St Helier will be intensified by deliberate design.</p>	<p>The thrust of the Spatial Strategy of the 2011 Island Plan remains unaltered by the Minister's proposed amendments such that most of the Island's development needs should be met from within the existing built-up area and the Minister is keen to ensure that development activity remains primarily focussed on existing built-up areas of the Island, which are predominantly in the south - east of the Island.</p> <p>Policy BE1 (12) of the existing 2011 Island Plan encourages and supports the conversion of under-utilised upper floors to residential use.</p> <p>Masterplanning of the Regeneration Zones identified in the Island Plan is underway: the North of Town Masterplan is approved and adopted and is being used to catalyse and guide development in this part of town. Work is currently underway in relation to the Mont de la Ville area.</p> <p>Any relocation of office space to the Waterfront provides opportunity for urban regeneration in the former commercial districts of the town, principally based on residential development: this is already recognised and planned for in the 2011 Island Plan and supported by masterplanning work.</p>
			<p>I can see no point in re-submitting my many articles previously offered to the Planning/Environment Department over the decades. They have clearly been ignored in the past and I have no doubt will be so ignored in the future.</p> <p>The Department, through its officers and politicians evidently has a closed mind which is entrenched with regard to the production of successive Island Plans which have, by any impartial measure, failed miserably to achieve the lofty ideals and aspirations set down in the Planning Law(s) since the war.</p> <p>Jersey's built environment is a monument to professional planning failure.</p> <p>The Island has experienced an extraordinarily buoyant economy since the 1950s which owes very little to the planning process but mostly to UK policies on tourism, travel, currency restrictions, the development of the EU and peculiarities in international finance etc across a changing world.</p>	<p>Representations are not disregarded but are given careful consideration by the Minister, as well as being subject to independent scrutiny, by inspectors.</p> <p>The views expressed about the performance of the Island's planning system are noted, but not shared.</p>

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			<p>Now, I believe that the Island Plan should be scrapped as a largely irrelevant document which actually does more harm than good. So far as housing provision is concerned the Plan is just a component part of a discriminatory policy package that will never address the housing needs of the whole population. It has and will continue to fail to deliver "affordable" houses to those who are seeking them or "social" housing to those in "need".</p> <p>The re-zoning of small parcels of land for housing developments is just a temporary expedient. As a stop-gap measure it may provide some housing accommodation and to this extent should be encouraged. But the need is for a totally new, fresh appraisal of housing provision in Jersey alongside a wholesale re-examination of the purposes of planning, the use of land and all the other related issues.</p> <p>I make no attempt to undertake such a task or to suggest how it might be done. I merely want to state that the very limited invitation extended to the public now with regard to the possible re-zoning of a few sites is wholly inadequate and that a much wider discussion should take place as soon as possible.</p>	<p>The Island Plan seeks to make provision to meet the Island's overall housing requirements and to ensure that the standard of accommodation for all new residential development meets the Minister for Planning and Environment's basic standards (see Policy H8 and pre-ambles of 2011 Island Plan).</p> <p>The Minister wishes to engage with the community in 2014 as part of a review of planning in Jersey since the adoption of the 1964 Island Planning Law, to include a review of its purposes and objectives for the future.</p>
IR(1) -139	Mr Michael Stein	MSPlanning Ltd	<p>Please find enclosed a written representation prepared by Pioneer Property Services Ltd which questions the basis of evidence for the demand and supply of affordable housing and which concludes that, as a consequence, "the proposed land supply falls short of accommodating the demand," as has routinely occurred in Plan preparation in Jersey over the last 3 decades.</p> <p>I trust this representation will be referred to the Planning Inspectors for review and consideration ahead of their Examination in Public which I understand will take place in the first two weeks of January 2014.</p> <p>The upshot of this is that more than the 6 sites identified in policies H1 and H5 of the Interim Plan need to be zoned over the length of the plan period. Alternatively, because of this history of under-provision, the Minister ought to consider including "Reserve" H1 and H5 sites - which can be released as and when the need arises without having to go through the lengthy process of Island Plan Review.</p> <p>Reserve sites were considered by the Inspectors in their previous reports to the Minister, but the case for these to be included is much more compelling now.</p> <p><i>Below is the 'Conclusion' from the report by Pioneer Property Services Limited – the full report can be viewed using this link: <a href="http://consult.gov.je/file/2644700">http://consult.gov.je/file/2644700</a></i></p> <p><b>6. Conclusion</b></p> <p>6.1 This report has identified concerns over the methods in which the JIP Interim has reached its projected forecasts. It is unclear whether up to date base population figures have been accurately implemented and that robust methods of data extraction have been used.</p> <p>6.2 The evidence base produced by the Statistics Unit (FRFH addendum) seems to be relying on outdated sources. Moreover, various methodologies used for the population modelling are not clearly illustrated, with some methods such as the JASS relying on evidence not accurately representing Jersey's current population due to insufficient survey techniques.</p> <p>6.3 It is reasonable to suggest that where the JIP interim seeks to propose housing delivery targets for the plan period, these should be founded upon a robust and credible evidence base. This is the foundation of the approach to developing statutory policy in the UK, a model template previously referred to within the FRFH 2007. Whilst the UK approach may be less than perfect, this does not reduce the reasonableness of</p>	<p>The Minister does not concur with the overall conclusions of this representation. Specifically in respect to the following relevant sections of the Pioneer Property Services Ltd representation, he responds as follows;</p> <p><b>3. Demand</b></p> <ul style="list-style-type: none"> <li>The housing demand figures shown in the proposed revisions to the Plan are based on work undertaken by the Statistics Unit. This takes into account new population and household modelling, which uses the 2011 Census results and addresses demand for new homes from new households. It also embraces the findings of the latest Housing Needs Survey (2012) and in so doing addresses latent demand.</li> <li>It is recognised that some confusion for Pioneer arises because of the continued reference to old data sources, used in the original 2011 Plan, which are linked to new para. 6.24. The Minister will amend this anomaly in the revised version of the housing chapter and will acknowledge the latest reports produced by the Statistics Unit on housing demand, the latest Housing Needs Survey and latest Housing Gateway statistics.</li> <li>In addition, reference to the 'Future requirements for homes addendum' is also to be updated as it has been overtaken by new information describing the housing demand situation as at the start of 2013 (<a href="#">Residential Land Availability @ January 2013</a>). References will be made clearer in the 2011 Island plan review to the Statistics department's '2012 Housing needs survey' which is referenced as the Jersey's Housing assessment 2013 to 2015' in the footnotes, which provided background to the housing need (affordable homes) estimate. All of these documents are on the <a href="#">core documents list</a> as part of the EiP.</li> <li>The original recommendation to consider the implementation of a 'Population Forecast Model' (e.g. Chelmer Model) was subsequently discussed with the Statistics Unit. It reviewed the model and decided it was not the right way forward to secure reliable information on housing demand locally.</li> <li>In doing so, the demand estimates are based purely on projections of numbers of private households (i.e. they do account for persons in communals).</li> </ul> <p><i>"The representations made by Pioneer Property Services Ltd on behalf of MS Planning Ltd imply a lack of transparency of the methodology of the statistical basis for the residential housing component of the Jersey Island Plan 2011.</i></p> <p><i>To be clear:</i></p> <ul style="list-style-type: none"> <li><i>all statistical publications produced by the States of Jersey's Statistics Unit are publicly available on the Statistics Unit's website on the day of release;</i></li> <li><i>all such publications contain a description of the underlying statistical methodology.</i></li> </ul> <p><i>The publications relevant to the comments of Pioneer/MS Planning are:</i></p> <p><b><u>Housing demand:</u></b> see reports at <a href="http://gov.je/Government/JerseyWorld/StatisticsUnit/PeopleCommunities/Pages/HousingNeedsSurvey.aspx">http://gov.je/Government/JerseyWorld/StatisticsUnit/PeopleCommunities/Pages/HousingNeedsSurvey.aspx</a> <a href="#">x</a></p> <p><b><u>Population and household projections:</u></b></p>

Ref	Name	Agent/ Organisation	Reasons for answer	Minister's Response
			<p>the requirement that local development framework policies be informed by robust evidence base.</p> <p>6.4 More clarification is also needed when illustrating the sources of supply. Heavy reliance upon the redevelopment of existing States owned stock to provide 400 extra homes needs to be explained. Indeed, the avoidance of specifying exactly which sites are to be allocated is worrying, as is the admission set out in paragraphs 6.97 &amp; 6.98, that the potential contribution of such sites is not known</p> <p>6.5 The failure to recognise the inspector's concerns (published in his report regard The (Draft) Jersey Island Plan)<sup>1</sup> regarding the under-provision of affordable housing is worrying, as is the JIP Interim's disregard to implement the suggestion of having 'reserve' rezoned sites.</p> <p>Such a policy would be a logical provision when considering the past dependency on such a need and the likely underestimate of demand published in the JIP Interim.</p> <p>6.6 In essence, the projected figures for household demand in both the JIP 2011 and subsequent JIP Interim are considered to be inadequate due to a lack of a clear and robust evidence base and outdated sources of data. As a consequence, the proposed land supply also falls short of accommodating such demand.</p> <p><sup>1</sup> The (Draft) Jersey Island Plan Inspectors' Report, p.53, para. 8.16</p>	<p>see reports at: <a href="http://gov.je/Government/JerseyWorld/StatisticsUnit/Population/Pages/Population-projections.aspx">http://gov.je/Government/JerseyWorld/StatisticsUnit/Population/Pages/Population-projections.aspx</a> These reports contain a description of the statistical methodology</p> <p><b>Population numbers and structure</b> see Census report at <a href="http://gov.je/Government/Census/Pages/Census.aspx">http://gov.je/Government/Census/Pages/Census.aspx</a> for annual updates, including a reconciliation of the pre-and post-Census population measures, see the reports relating to 2011 and 2012 at: <a href="http://gov.je/Government/JerseyWorld/StatisticsUnit/Population/Pages/Population.aspx">http://gov.je/Government/JerseyWorld/StatisticsUnit/Population/Pages/Population.aspx</a> All of these reports contain a description of the statistical methodology</p> <p><b>Duncan Gibaut</b> <b>Chief Statistician</b> <b>States of Jersey Statistics Unit - 20th November, 2013"</b></p> <p>All of these documents are on the <a href="#">core documents list</a> as part of the EiP.</p> <p><b>4. Housing aspirations</b></p> <ul style="list-style-type: none"> <li>The estimated 400 additional dwellings required for the period 2013-2020, are based on the findings of the 2012 Housing Needs Survey / Jersey's housing assessment 2013-15. As stated the Statistics Unit are confident with the robustness of its assessment of housing need and the adequacy of the data sources used. It can also, no doubt, offer a view on the merits or otherwise of including other data sources to help determine housing need (e.g. the Affordable Housing Gateway - month end statistics) at the EiP if required.</li> </ul> <p><b>5. Land supply</b></p> <p>A relatively up-to-date position on potential housing supply for the next few years is provided in '<a href="#">Residential land availability at January 2013</a>' (published September 2013). This document was used in updating the Island Plan interim review and will be referenced accordingly</p> <ul style="list-style-type: none"> <li>Among other things, this document identifies States' owned sites and other Category A sites that are expected to yield before the end of 2017 and beyond (using net totals) and also potential yields from sites currently being proposed for rezoning.</li> <li>It is not normal for a development plan (i.e. the Island Plan) to list every potential site which may or may not come forward over the next 10 to 20 years. This is a continually moving feast, which needs to be regularly monitored through housing land availability reports. For Island Plan purposes it will always be necessary to make educated assumptions about potential supply, based on the best available information at that time.</li> <li>The information regarding the redevelopment of outworn States of Jersey housing estates has been reappraised, in consultation with the Housing Department, since the publication of the 2011 Island Plan. Detailed background information on potential net yields from such sites is included in '<a href="#">Residential land availability at January 2013</a>'.</li> </ul> <p><b>6. Conclusion</b></p> <ul style="list-style-type: none"> <li>The Statistics Unit have confidence in the robustness of the evidence base for the housing demand estimates, and their methodologies are fully publicised in all of their relevant reports.</li> <li>The recently released report '<a href="#">Residential land availability at January 2013</a>' provides much of the more detailed information being sought on potential housing supply.</li> <li>The whole purpose of the proposed changes to the Housing Section of the Island Plan is to ensure that local housing demands and the need for affordable homes will be met by the modified policies and proposals now being considered.</li> </ul>
Second Round Representations				



Ref	Name	Agent/ Organisation	Reasons for answer	Minister's Response
IPR (1) – 2 <sup>nd</sup> Rnd Rep	Monsignor Nicholas France	Caritas Jersey	<p><b>Preface</b></p> <p>In our initial comments submitted by letter (e-mail) at the end of September we concentrated on the issue of inadequate supply of 'affordable housing' in the Island.</p> <p>We explained why we had not been able to submit more comprehensive comments before your deadline date and sought your willingness to accept later comments. We appreciate your assistance in this matter.</p> <p>We will not comment at this stage on other matters which are part of this review, wishing to leave that to others who are more knowledgeable on detailed environmental matters.</p> <p>In referring to the consultation document we will refer to Policy, page and paragraph numbers to assist in correlating our comments with your consultation document.</p> <p><b>Scope</b></p> <p>We note that some 13 policies are subject of this review. We intend to make our comments in policy sequence where we believe we have something to offer; they will be related to the revisions highlighted in yellow.</p>	Comments noted
			<p><b>Housing Introduction (pp227)</b></p> <p>The first sentence of the statement in para 6.1 is key to our comments. We observe that this makes no reference especially to the need of 'the home as a place for the family' or 'for family life'. We believe this is a drafting lacuna and feel it should be rectified as part of your revision.</p> <p>We note the first three bullet points of the States of Jersey Strategic Plan 2012 and express our support for those.</p>	The States Strategic Plan seeks to ensure that the Island makes provision to house the entire community and that all Island residents, whether in families or as individuals, are adequately provided for and supported: the Island Plan seeks to respond to this.
			<p>We note also the revised wording of para 6.5. Our primary concern expressed through these comments is for those residents of the Island who for whatever reason live in <i>"unqualified property, such as a lodging house or staff accommodation, or to live in qualified property with a qualified person as their lodger or partner."</i></p> <p>The former applies to those migrant persons who are here on short-term assignments, such as those working traditionally in agriculture or tourism, as well as those who wish to make Jersey their home. Initially this may be anticipated to be for a small number of years which will not entitle them to purchase a housing unit.</p> <p>Sadly, there is a significant number of residents who end up living in Jersey beyond the now qualification period of ten years and who may never be able to aspire to owning their own property.</p> <p>Our concern therefore is for all those in this situation regardless whether they are eligible for residential qualification or not. Many will have been connected to the island for several generations.</p> <p><b>Planning for Homes &amp; Categories of Housing</b></p> <p>Pages 229/230/231 set out the two categories of housing. Category A is defined as 'affordable housing'.</p> <p>We note paras 6.6 through 6.9 (not revised). We consider the process of planning for homes as critical to the long-term cohesion and well-being of the community. Particular attention must be paid to the needs of those who are today seriously disadvantaged and, from many years of experience, we suggest may well continue to be unless a miracle occurs for them.</p> <p>Such a process of assessing present and future demand of those in poor and substandard accommodation or forced by changing circumstances to be in</p>	<p>The Plan seeks to meet the needs of all Island residents and responds to needs for qualified and unqualified housing as well as both open market and social housing.</p> <p>The need for homes is based on a sound and robust evidence base.</p> <p>The Housing Needs Survey is weighted to reflects the housing needs across the community.</p>



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			<p>overcrowded accommodation must be based on sound and comprehensive knowledge.</p> <p><b>Demand for Homes (pp231- 235)</b></p> <p>We note in para 6.27 reference to the 2012 Housing Needs Survey for 2013-15 conducted by the Statistics Unit. We are not questioning their findings but can we be sure that it fully represents the groups within the community for whom we express our concerns? Is the full extent of the various situations which we have encountered, or of which we are aware, known to the Housing authority and factored into the thinking behind this section of the Review?</p>	
			<p>We are very concerned that the time lines set out based on this Plan and the Strategic Plan do not look far enough into the future, notwithstanding the reference to the Population Model looking out to 2065. We note in para 6.20 that <i>"The Council of Ministers recognises that further analysis of this issue is required and proposes to review immigration and population objectives for Jersey as part of the development of a Long Term Plan to be brought forward in the Spring 2014 follow (sic) a period of public engagement."</i> We hope that the outcome of this further analytical and consultative process will inform this planning review as it runs in parallel.</p> <p>While there was an active period following the research work of the 1990s into Housing and Poverty in the Island, and correlated with the poor health of those experiencing relative poverty, especially in the Town area, as a result of which housing supply was improved significantly by the early 2000s, we suggest that the States and therefore Planning should now look at current trends and supply needs likely to be encountered up to 2050, not just to 2020 (ref. Table 6.1).</p> <p>Otherwise, the recent and current problem of demand outstripping supply will repeat and repeat <b>in cyclic manner</b>.</p> <p>Some time ago, in the lead up to the 2011 Island Plan process, the States of Jersey conducted a visioning process "Imagine Jersey 2035". With specific regard to the Housing situation, perhaps what is required now is "Imagine Housing in Jersey 2050".</p>	<p>The Island Plan has a statutory Plan period of 10 years. There are, however, longer-term objectives contained within the Plan that will go beyond the remaining Plan period.</p> <p>The development of sustainable long term planning is a priority of the States Strategic Plan</p>
			<p><b>Affordable Housing</b></p> <p>Para 6.13 defines this term which can slip off the tongue so easily. But what does it really mean to be "truly affordable" (para 6.12)? Many residents who we meet and for whom we express deep concern are those earning well below the median. And they achieve those levels of family or household income as a result of perhaps having up to three or more part-time jobs! Doing work which, if not performed, would be noticed by its absence. We are writing of those talked about in 6.11 not being able to <i>"afford the cost of housing in Jersey"</i>.</p> <p>Most of the residents we refer to perform essential tasks in the service industries; the hospitality sector; the domestic, hospital and residential care services. And so on. We note also that some of this accommodation is to be met by Category B Housing, "market housing" (para 6.14).</p> <p>For example, the 500 jobs in the agricultural sector filled by migrants during the planting and harvesting seasons. We realise that many of those probably are accommodated by their employers and some years ago it was not necessarily of a very acceptable standard.</p> <p>We express concern too for those eligible young people, who were born in Jersey and are about to leave school and seek employment at a most difficult time, who must wonder at their prospects of finding their own accommodation which they are likely to be able to afford.</p> <p>While perhaps not part of this Review and consultation, the issue of the level of</p>	<p>The definition of 'truly affordable' homes is that provided at para. 6.13 such that affordable housing should meet the needs of persons on median incomes or below, who would otherwise have financial difficulties renting or purchasing residential accommodation in the general residential market, determined with regard to income levels and house prices prevailing in Jersey.</p> <p>Rent control is outwith the remit of the Minister for Planning and Environment and the Island Plan: it is a matter for the Minister for Housing and the Strategic Housing Unit.</p>

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			<p>rents is pertinent. It was the Dean's experience when living in Southampton that Rent Control had a major part to play in keeping rents affordable for those in the lowest paid occupations. We understand that the Jersey philosophy is based on letting the market (and the law of supply and demand) determine the value placed on much of the poorest accommodation. We feel that without some form of control, any publicly-funded support given to tenants is likely to go to the landlord and not to enabling people to save sufficiently to get on to the first 'rung' or subsequently make progress up the housing 'ladder'.</p> <p>We will be looking at the proposed Plan revisions with the notion in mind of '<b>more more affordable' housing</b>. And by this we refer not only to the aspiration of home ownership but also to a life for many of <b>affordable renting</b> both of which are covered by para 6.13. We agree with para 6.33.</p> <p>Notwithstanding para 6.35 and 6.36 taken together, we are not convinced that the States of Jersey as a whole really appreciate that the world is changing with regard to the type of homes required in the future. Given both the economic experience of the last five years and the likely future, public expectations of what is affordable must be reduced for generations to come. This is a real social issue and a challenge for Jersey's government. Table 6.2 gives us serious concerns as the extent of the problem.</p>	
			<p><b>Supply of homes (pp236 - 242)</b></p> <p>We note the detailed analysis leading up to Table 6.3 which is somewhat comforting given that the total number is greater than that for demand. However, we remain to be assured that all of the various needs have been accounted for.</p> <p>We remain sceptical of the likely progress towards achieving the target, given the example of the former Girls' College (see para 6.47).</p> <p>We will watch with interest the progress made with regard to those housing sites for which planning approval has already been given and the ability of the land-owners and the construction industry to respond. Surely the provision of homes has a much greater social priority than the creation of more office space which seems to encourage more inward migration of specialists in the upper ranges of income seeking larger and more expensive 'windfall' homes. Building apartments and other forms of rental and first-time homes as well as those dedicated to the older generation in down-sizing mood is also likely to provide employment to the locally un-employed.</p> <p>The question then becomes - where?</p>	<p>The States Strategic Plan seeks to ensure that the Island makes provision to house the entire community and that all Island residents are adequately provided for and supported: the Island Plan seeks to respond to this.</p> <p>Similarly, there is a need to plan for the sustainable development of land that can provide for the Island's economic objectives.</p>

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			<p><b>Housing Policy Ht &amp; H2 &amp; H5</b></p> <p>There is little doubt in our mind that bringing forward appropriate, publicly-owned sites has to be a high priority for keeping the underlying cost of land provision and is 'brown-field' land in most cases.</p> <p>Are those sites listed in paras 6.47 and 6.48 in St. Helier, and 6.55 and 6.56 in St. Helier, St. Clement and St. Brelade, the only ones? - We agree that St. Helier should be where the concentration of replacement 'new build' is preferred under various related States policies. This must however be integrated with the consequential increased demand within Education's portfolio of schools as well as at 'private' schools. Similarly, increased public transportation must be a factor. And so on.</p> <p>This Review appears to have much greater expectations that private re-zoned land will be more readily transformed into housing sites. Paras 6.49 through to 6.68 apply [save for paras 6.53 - 6.56].</p> <p>At face value, it appears that spent glass-houses are a likely source but we appreciate that there has been considerable opposition to some of these in St. Clement.</p>	<p>The essential thrust of the Plan remains the focus of development activity in or adjacent to the Island's principal built-up areas to ensure that the most sustainable pattern of development is achieved. It also seeks to promote the use of already developed land and to ensure that the need to travel is reduced and/or that travel choices are optimised. The Minister's proposed strategy for the delivery of affordable homes responds positively in respect of all of these objectives.</p> <p>Over two-thirds of the proposed provision of affordable homes, as set out in the Minister's strategy for the provision of affordable homes, is focussed on sites within the Island's existing built-up area. This includes the proposed provision of homes on existing States-owned sites (Policy H1); the redevelopment of existing housing estates administered by the Housing Department; and the development of sites already zoned for affordable homes (Policy H2). By focussing the provision of affordable homes in existing built-up areas, this ensures that new residents have the best access to facilities, services and infrastructure that already exists, and also reduces the need to travel or provides people with more opportunity to walk and cycle to work, school or to local facilities, because journey lengths are likely to be shorter.</p> <p>Of the homes to be provided on sites proposed for rezoning less than 2% are proposed to be provided on greenfield land, as a proportion of overall supply. This only amounts to 6% of homes as a proportion of affordable housing provision. At a strategic level, therefore, the Minister is seeking to ensure that development activity is very much focussed on land which has already been developed in some way to ensure that, as far as possible, the Island's most valuable coast and countryside is protected from development.</p> <p>The majority of sites proposed for rezoning to provide affordable homes are on the edge of the Island's main urban settlement (comprising St Helier/ St Saviour and St Clement see: settlement hierarchy pp. 18, 2011 Island Plan) and propose the release of land that already has been subject to some form of development, as glasshouses.</p>
			<p><b>Summary</b></p> <p>We are not in a position at this time to delve deeper in to the pros and cons of specific sites proposed. If our views are further sought, then we will do our utmost to assemble meaningful comment and observations, based on our own research in the coming months.</p> <p>Meanwhile, we urge all those involved at the next and further stages in this review to have regard to the particular needs of the disadvantaged now in Jersey rather than those advantaged people who might be attracted to the Island for whom there appears to be no shortage of housing.</p>	<p>The primary focus of the interim review of the 2011 Island Plan is to respond to the need for more affordable homes.</p>

## Miscellaneous comments

The Minister for Planning and Environment has received a number of miscellaneous comments about the 2011 Island Plan, mostly posted online. These comments have been submitted in response to specific policies of the Plan but appear to bear little relation to them and may, therefore, have been erroneously entered. In such circumstances, it is difficult for a substantive response to be made to them, but they are captured here for completeness.

Ref	Name	Agent/ Organisation	Supporting/ Objecting	Reasons for answer	Minister's Response
IR(1) -24	Anonymous		Objecting (GD2 amendment)	This should be a green area as St Clements is built up enough. The problem with this Island is there is too much concrete and not enough green.	
IR(1) -6	Anonymous		Objecting (GD2 amendment)	Another subjective waste of time, which is down to personal opinion and generally against progress	
IR(1) -68	Anonymous		Objecting (GD2 amendment)	Absolutely furious that this is even being considered AGAIN after continuous rejection previously	
IR(1) -70	Anonymous		Objecting (GD2 amendment)	Hi, I believe the density of housing in the area is already high, addition builds would increase the density and affect the local community. The impact on traffic around the area, which during peak times is already an issue. The added pressure on local resources such as schools. At present the field is used for allotments and an area for horses, which from a child's perspective is lovely and not something that is normally seen so close to home. Thank you Phil	
IR(1) -81	Anonymous		Objecting (GD2 amendment)	1) the high density of housing in the area already 2) the impact on traffic 3) pressure on local resources such as schools 4) the importance of maintaining green land - possibly for allotments? - see local media recently	
IR(1) -129	Deputy Jeremy Macon	States Member (St. Saviour No.1); Member of the Planning Applications Panel	Objecting (GD2 amendment)	Costal National Park Zone - too restrictive regarding extensions Historic windows and doors - over the top glazing stuck on bars should be allowed Glass houses - planning department should stay strong as some of the site received grants from the States with a return to agriculture clause - can be done! Farmers / Land Owners just holding on to site as they are waiting to be rezoned for housing Employment land - needs to be reworded that so that not just 1 criteria has to met. Too much of a drive to have land re classified to residential as it creates highest yield in the island.	
IR(1) -116	Karen Quenault		Objecting (GD2 amendment)	St Clement in particular is already densely populated and after the green zoning it is a complete u-turn on the decision made which is benefit the area. It would be a huge drain on the local resources and local schools and bring far too much extra traffic through the area. As we can see from the Mount Bingham fiasco there are already too many cars using just a few roads to make their way into St Helier for work and schooling. The land would be much better used to benefit the existing community for purposes such as allotments which many people are crying out for and would enhance the area rather than bring down the value of the local residents who have struggled and saved to purchase their properties.	
IR(1) -10	Anonymous		Objecting (Proposal 4a)	This is far too much power to be given to one person it should be decided upon by an independent committee with representatives of all whom it directly concerns and the public should also have a voice for the good of our island.	
IR(1) -49	Chris Lamy		Supporting (Proposal 4a)	E.112 is the way forward however I believe that most of the existing facilities as the renovation of the El Tico are necessary for the enjoyment of visitors to the park, locals and tourists alike. The Watersplash which is now looking somewhat dated is in need of	

Ref	Name	Agent/ Organisation	Supporting/ Objecting	Reasons for answer	Minister's Response
				similar attention. Also the Chateau Plasir is a disgrace and even though consent has been given to construct three houses on this site I believe it needs further thought.	
IR(1) -176	Martin Whitley	La Comité du Commune Rurale St. Jean	Supporting (Proposal 4a)	The northern coastal path is integral to the character of St John and the Coastal National Park should be provided protection.	
IR(1) -117	Deputy Steve Luce	States Member (St. Martin); Member of the Environment Scrutiny Panel	Neither (Policy NE7)	I believe that "Employment Land" issue needs to be revisited and revised. I feel very strongly that the SPG, when published, went much further than any Members of the States Assembly would have imagined when they agreed to it initially. I would wish to submit my views on Employment land to the Inspector.	