

Minister for the Environment's Consolidated Comments on P.36/2021: Island Plan 2022-25: Approval

Introduction

To aid the debate of P.36/2021 (Island Plan 2022—25: Approval) (the Bridging Island Plan), the Minister for the Environment has presented and his consolidated comments to States Members on all the amendments, and amendments to amendments. For administrative ease, the amendments are listed in this document in their numerical order, rather than the running order of the debate. The running order will re-order the amendments relative to the subject matter and where it appears in the draft Bridging Island Plan.

This approach is in line with the approach taken throughout the Island Plan programme, to ensure transparency and access to all documentation in the run-up to the debate of the draft Bridging Island Plan.

Minister for the Environment
Consolidated Comments on P.36/2021



Initial voting position

The Minister for the Environment’s initial position on all amendments, and amendments to amendments, due for debate is provided below; however, it should be noted that the Minister’s position may change during the debate dependent on the outcome of inter-related amendments, or the emerging position of the Assembly as a whole on particular issues.

Proposition	Title	Proposer	Minister's initial position	Link to States Assembly website	Link to Comments in this document
P.36/2021 Amd. 01	Island Plan 2022-25: Approval – amendment – (Removal of St Helier Fields)	Deputy Le Hegarat	Accept	Link	Link
P.36/2021 Amd. 02	Island Plan 2022-25: Approval – second amendment – Removal of St Saviour Fields	Deputy Lewis	Partially Accept (See Comments)	Link	Link
P.36/2021 Amd. 03	Island Plan 2022-25: Approval – third amendment – Play Area Proximity	Deputy Gardiner	Partially Accept (See Comments)	Link	Link
P.36/2021 Amd. 04	Island Plan 2022-25: Approval – fourth amendment – Use of Field P558 in St. Peter [for housing]	Constable Vibert	Accept	Link	Link
P.36/2021 Amd. 05	Island Plan 2022-25: Approval – fifth amendment – Children’s Play Space	Deputy Doublet	Accept	Link	Link
P.36/2021 Amd. 06	Island Plan 2022-25: Approval – sixth amendment – Education Estates	Deputy Gardiner	Reject	Link	Link
P.36/2021 Amd. 07	Island Plan 2022-25: Approval – seventh amendment – Restriction of Parish Priority [affordable homes allocation]	Deputy Gardiner	Accept	Link	Link
P.36/2021 Amd. 08	Island Plan 2022-25: Approval – eighth amendment – Gas site	Deputy Ward	Accept	Link	Link

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	Tunnell Street St Helier [education use]				
P.36/2021 Amd. 09	Island Plan 2022-25: Approval – ninth amendment – Springfield Development [open space]	Deputy Ward	Accept	Link	Link
P.36/2021 Amd. 10	Island Plan 2022-25: Approval – tenth amendment – Nelson Street Car Park [youth facility]	Deputy Ward	Accept	Link	Link
P.36/2021 Amd. 11	Island Plan 2022-25: Approval – eleventh amendment – Field 630, St. Ouen [remove protected open space designation]	Constable Buchanan	Reject	Link	Link
P.36/2021 Amd. 12	Island Plan 2022-25: Approval – twelfth amendment – Removal of Field H1219 St. Helier [affordable housing]	Constable Crowcroft	Reject	Link	Link
P.36/2021 Amd. 13	Island Plan 2022-25: Approval – thirteenth amendment – Trees and Water Features	Constable Crowcroft	Accept	Link	Link
P.36/2021 Amd. 14	Island Plan 2022-25: Approval – fourteenth amendment – Double Glazing [in historic buildings]	Deputy Huelin	Reject	Link	Link
P.36/2021 Amd. 15	Island Plan 2022-25: Approval – fifteenth amendment – Corbière Walk [protected open space]	Deputy Truscott	Accept	Link	Link
P.36/2021 Amd. 16	Island Plan 2022-25: Approval – sixteenth amendment – Field MN410, St. Martin [over-55's]	Deputy Luce	Reject	Link	Link

Minister for the Environment
Consolidated Comments on P.36/2021



Proposition	Title	Proposer	Minister's initial position	Link to States Assembly website	Link to Comments in this document
P.36/2021 Amd. 17	Island Plan 2022-25: Approval – seventeenth amendment – Use of Field MN489 for over-55's Homes	Deputy Luce	Reject	Link	Link
P.36/2021 Amd. 18	Island Plan 2022-25: Approval – eighteenth amendment – Field L127 [affordable housing]	Senator Pallett	Reject	Link	Link
P.36/2021 Amd. 19	Island Plan 2022-25: Approval – nineteenth amendment – St. Brelade's Bay Improvement Plan Time Frame	Senator Pallett	Accept	Link	Link
P.36/2021 Amd. 19 Amd. 01	Island Plan 2022-25: Approval – nineteenth amendment – amendment	Senator Ferguson	Reject	Link	Link
P.36/2021 Amd. 19 Amd. 02	Island Plan 2022-25: Approval – nineteenth amendment – second amendment	Constable Jackson	Withdrawn	Link	
P.36/2021 Amd. 20	Island Plan 2022-25: Approval – twentieth amendment – La Gigoulande Quarry	Senator Moore	Reject	Link	Link
P.36/2021 Amd. 21	Island Plan 2022-25: Approval – twenty-first amendment – Disability Inclusion – Active Travel	Deputy Gardiner	Accept	Link	Link
P.36/2021 Amd. 22	Island Plan 2022-25: Approval – twenty-second amendment – Disability Inclusion – Homes for Independent Living	Deputy Gardiner	Accept	Link	Link
P.36/2021 Amd. 23	Island Plan 2022-25: Approval – twenty-third amendment – Disability Inclusion – Clauses	Deputy Gardiner	Accept	Link	Link

Minister for the Environment
Consolidated Comments on P.36/2021



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P.36/2021 Amd. 24	Island Plan 2022-25: Approval – twenty-fourth amendment – Disability Inclusion – historic building accessibility	Deputy Gardiner	Accept	Link	Link
P.36/2021 Amd. 25	Island Plan 2022-25: Approval – twenty-fifth amendment – Future Affordable Housing Provision	Senator Mezec	Accept (ONLY if amended by MENV)	Link	Link
P.36/2021 Amd. 25 Amd. 01	Island Plan 2022-25: Approval – twenty-fifth amendment – amendment	Minister for the Environment, Deputy John Young	Accept	Link	Link
P.36/2021 Amd. 26	Island Plan 2022-25: Approval – twenty-sixth amendment – Amendments to Policy H8, Policy SP2 and Policy PL5 [housing outside the built-up area]	Senator Moore	Reject	Link	Link
P.36/2021 Amd. 27	Island Plan 2022-25: Approval – twenty-seventh amendment – Waterworks Valley [countryside access]	Deputy Morel	Accept	Link	Link
P.36/2021 Amd. 28	Island Plan 2022-25: Approval – twenty-eighth amendment – Traditional Farm Buildings	Deputy Morel	Reject	Link	Link
P.36/2021 Amd. 29	Island Plan 2022-25: Approval – twenty-ninth amendment – First Time Buyers [fields S470 and S415a]	Constable Le Sueur-Rennard	Reject	Link	Link
P.36/2021 Amd. 30	Island Plan 2022-25: Approval – thirtieth amendment – Coastal National Park	Deputy Renouf	Reject	Link	Link

Minister for the Environment
Consolidated Comments on P.36/2021



Proposition	Title	Proposer	Minister's initial position	Link to States Assembly website	Link to Comments in this document
P.36/2021 Amd. 31	Island Plan 2022-25: Approval – thirty-first amendment – St. Helier Country Park	Constable Crowcroft	Partially Accept (See Comments)	Link	Link
P.36/2021 Amd. 32	Island Plan 2022-25: Approval – thirty-second amendment – Les Quennevais Development	Constable Crowcroft	Withdrawn	Link	
P.36/2021 Amd. 33	Island Plan 2022-25: Approval – thirty-third amendment – Field J371, St. John [community and open space]	Constable Jehan	Reject	Link	Link
P.36/2021 Amd. 34	Island Plan 2022-25: Approval – thirty-fourth amendment – Field J229, St. John [supported housing]	Constable Jehan	Withdrawn	Link	
P.36/2021 Amd. 35	Island Plan 2022-25: Approval – thirty-fifth amendment – Field J236, St. John [supported housing]	Constable Jehan	Withdrawn	Link	
P.36/2021 Amd. 36	Island Plan 2022-25: Approval – thirty-sixth amendment – Field J939, St. John	Constable Jehan	Withdrawn	Link	
P.36/2021 Amd. 37	Island Plan 2022-25: Approval – thirty-seventh amendment – Aquaculture	Deputy Morel	Accept	Link	Link
P.36/2021 Amd. 38	Island Plan 2022-25: Approval – thirty-eighth amendment – Warehousing [Bienvenue Farm]	Deputy Morel	Reject	Link	Link
P.36/2021 Amd. 39	Island Plan 2022-25: Approval – thirty-ninth amendment – Conservation Areas	Deputy Morel	Accept (but superseded by MENV's Amd. 89)	Link	Link

Minister for the Environment
Consolidated Comments on P.36/2021



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P.36/2021 Amd. 40	Island Plan 2022-25: Approval - fortieth amendment – Field P559 Affordable Housing	Senator Moore	Accept	Link	Link
P.36/2021 Amd. 41	Island Plan 2022-25: Approval – forty-first amendment – States'-Owned Land [affordable housing]	Senator Mezec	Accept (ONLY if amended by MENV)	Link	Link
P.36/2021 Amd. 41 Amd. 01	Island Plan 2022-25: Approval – forty-first amendment – amendment	Minister for the Environment, Deputy John Young	Accept	Link	Link
P.36/2021 Amd. 42	Island Plan 2022-25: Approval – forty-second amendment – Transport and Parking	Constable Crowcroft	Partially Accept (See Comments)	Link	Link
P.36/2021 Amd. 43	Island Plan 2022-25: Approval – forty-third amendment – Les Quennevais	Deputy Tadier	Accept (ONLY if amended by MENV)	Link	Link
P.36/2021 Amd. 43 Amd. 01	Island Plan 2022-25: Approval – forty-third amendment – amendment	Minister for the Environment, Deputy John Young	Accept	Link	Link
P.36/2021 Amd. 44	Island Plan 2022-25: Approval – forty-fourth amendment – Policy H4 [right-sizing]	Constable Jackson	Accept (ONLY if amended by MENV)	Link	Link
P.36/2021 Amd. 44 Amd. 01	Island Plan 2022-25: Approval – forty-fourth amendment – amendment	Minister for the Environment, Deputy John Young	Accept	Link	Link
P.36/2021 Amd. 45	Island Plan 2022-25: Approval – forty-fifth amendment – Night-Time Economy	Constable Jackson	Reject	Link	Link
P.36/2021 Amd. 46	Island Plan 2022-25: Approval – forty-sixth amendment – Driveways	Constable Jackson	Accept	Link	Link

Minister for the Environment
Consolidated Comments on P.36/2021



Proposition	Title	Proposer	Minister's initial position	Link to States Assembly website	Link to Comments in this document
P.36/2021 Amd. 47	Island Plan 2022-25: Approval – forty-seventh amendment – Warwick Farm	Deputy Morel	Reject	Link	Link
P.36/2021 Amd. 48	Island Plan 2022-25: Approval – forty-eighth amendment – Tall Buildings	Senator Ferguson	Reject	Link	Link
P.36/2021 Amd. 49	Island Plan 2022-25: Approval – forty-ninth amendment – Field MY563, St. Mary [affordable housing]	Constable Le Bailly	Accept	Link	Link
P.36/2021 Amd. 50	Island Plan 2022-25: Approval – fiftieth amendment – Field MY493, St. Mary [affordable housing]	Constable Le Bailly	Reject	Link	Link
P.36/2021 Amd. 51	Island Plan 2022-25: Approval – fifty-first amendment – Marine Park	Senator Farnham	Partially Accept (See Comments)	Link	Link
P.36/2021 Amd. 51 Amd. 01	Island Plan 2022-25: Approval – fifty-first amendment – amendment	Senator Farnham	Reject	Link	Link
P.36/2021 Amd. 52	Island Plan 2022-25: Approval – fifty-second amendment – Coastal National Park Exclusion [part of Field G252A]	Constable Le Maistre	Reject	Link	Link
P.36/2021 Amd. 53	Island Plan 2022-25: Approval – fifty-third amendment – St. Brelade's Shoreline	Constable Jackson	Withdrawn	Link	
P.36/2021 Amd. 54	Island Plan 2022-25: Approval – fifty-fourth amendment – St. Brelade's Bay	Constable Jackson	Withdrawn	Link	

Minister for the Environment
Consolidated Comments on P.36/2021



Proposition	Title	Proposer	Minister's initial position	Link to States Assembly website	Link to Comments in this document
P.36/2021 Amd. 55	Island Plan 2022-25: Approval – fifty-fifth Amendment - St. Brelade's Parking	Constable Jackson	Withdrawn	Link	
P.36/2021 Amd. 56	Island Plan 2022-25: Approval – fifty-sixth Amendment – St. Brelade's Workers' Accommodation	Constable Jackson	Withdrawn	Link	
P.36/2021 Amd. 57	Island Plan 2022-25: Approval – fifty-seventh Amendment – Tourist Economy and Public Amenities	Constable Jackson	Reject	Link	Link
P.36/2021 Amd. 57 Amd. 01	Island Plan 2022-25: Approval – fifty-seventh amendment – amendment	Constable Jackson	Reject	Link	Link
P.36/2021 Amd. 58	Island Plan 2022-25: Approval – fifty-eighth Amendment – St. Brelade's Bay Development	Constable Jackson	Partially Accept (See Comments)	Link	Link
P.36/2021 Amd. 59	Island Plan 2022-25: Approval – fifty-ninth amendment – St. Brelade's Community Participation	Constable Jackson	Reject	Link	Link
P.36/2021 Amd. 59 Amd. 01	Island Plan 2022-25: Approval – fifty-ninth amendment – amendment	Constable Jackson	Withdrawn	Link	
P.36/2021 Amd. 60	Island Plan 2022-25: Approval – sixtieth amendment – Performance Measures	Constable Jackson	Reject	Link	Link
P.36/2021 Amd. 60 Amd. 01	Island Plan 2022-25: Approval – sixtieth amendment – amendment	Constable Jackson	Reject	Link	Link

Minister for the Environment
Consolidated Comments on P.36/2021



Proposition	Title	Proposer	Minister's initial position	Link to States Assembly website	Link to Comments in this document
P.36/2021 Amd. 61	Island Plan 2022-25: Approval – sixty-first amendment – Glasshouses	Senator Moore	Reject	Link	Link
P.36/2021 Amd. 62	Island Plan 2022-25: Approval – sixty-second amendment – Withdrawal of G392A, Grouville [affordable housing]	Deputy C Labey	Reject	Link	Link
P.36/2021 Amd. 63	Island Plan 2022-25: Approval – sixty-third amendment – Amendment to Policy SP1 [construction materials]	Senator Moore	Accept	Link	Link
P.36/2021 Amd. 64	Island Plan 2022-25: Approval – sixty-fourth amendment – Amendment to Policy C12 [healthcare facilities]	Senator Pallett	Reject	Link	Link
P.36/2021 Amd. 65	Island Plan 2022-25: Approval – sixty-fifth amendment – Amendment to Policy GD7 [tall buildings]	Senator Gorst	Reject	Link	Link
P.36/2021 Amd. 66	Island Plan 2022-25: Approval – sixty-sixth amendment – Use of fields G403C, G403D and part of G432A, Grouville [affordable housing]	Deputy Wickenden	Withdrawn	Link	Link
P.36/2021 Amd. 67	Island Plan 2022-25: Approval – sixty-seventh amendment – Use of fields G508, G508A, G526, G526A G521A, Grouville [affordable housing]	Deputy Wickenden	Reject	Link	Link

Proposition	Title	Proposer	Minister's initial position	Link to States Assembly website	Link to Comments in this document
P.36/2021 Amd. 68	Island Plan 2022-25: Approval – sixty-eighth amendment – Use of Field T1404, Trinity [affordable housing]	Senator Pallett	Reject (possible alternative site)	Link	Link
P.36/2021 Amd. 69	Island Plan 2022-25: Approval – sixty-ninth amendment – Use of Fields P655 and P656, St. Peter [affordable housing]	Constable Vibert	Reject (possible alternative site)	Link	Link
P.36/2021 Amd. 70	Island Plan 2022-25: Approval – seventieth amendment – Use of Fields G234 and adjacent land, Grouville [affordable housing]	Constable Le Maistre	Reject (possible alternative site)	Link	Link
P.36/2021 Amd. 71	Island Plan 2022-25: Approval – seventy-first amendment – Use of Fields G355, Grouville [affordable housing]	Deputy Luce	Reject	Link	Link
P.36/2021 Amd. 72	Island Plan 2022-25: Approval – seventy-second amendment – Use of Fields G538A, Grouville [affordable housing]	Deputy Luce	Reject	Link	Link
P.36/2021 Amd. 73	Island Plan 2022-25: Approval – seventy-third amendment - Use of Field MN727, St. Martin [sports facilities]	Deputy Luce	Reject	Link	Link
P.36/2021 Amd. 74	Island Plan 2022-25: Approval – seventy-fourth amendment – Replacement of Policy HE1 [listed buildings and places]	Deputy R Labey	Reject	Link	Link
P.36/2021 Amd. 75	Island Plan 2022-25: Approval – seventy-fifth amendment –	Senator Moore	Accept	Link	Link

Proposition	Title	Proposer	Minister's initial position	Link to States Assembly website	Link to Comments in this document
	Residential Delivery and Management Strategy				
P.36/2021 Amd. 76	Island Plan 2022-25: Approval – seventy-sixth amendment – Visitor Parking	Deputy Macon	Reject	Link	Link
P.36/2021 Amd. 77	Island Plan 2022-25: Approval – seventy-seventh amendment – Use of Fields B26 and B27 in St. Brelade for Vehicle Inspection Centre	Minister for Infrastructure, Deputy Lewis	Withdrawn	Link	
P.36/2021 Amd. 77 Amd. 01	Island Plan 2022-25: Approval – seventy-seventh amendment – amendment	Minister for the Environment, Deputy John Young	Withdrawn	Link	
P.36/2021 Amd. 78	Island Plan 2022-25: Approval – seventy-eighth amendment – Rezone Field H1219A for accessible homes	Deputy Ahier	Reject	Link	Link
P.36/2021 Amd. 79	Island Plan 2022-25: Approval – seventy-ninth amendment – Amendment to Policy C13 [Our Hospital]	Deputy Gardiner	Accept	Link	Link
P.36/2021 Amd. 80	Island Plan 2022-25: Approval – eightieth amendment – Use of Villa de L'Aube & Field P818, St. Peter [affordable housing]	Deputy Huelin	Reject	Link	Link
P.36/2021 Amd. 81	Island Plan 2022-25: Approval – eighty-first amendment – Changes to Passivhaus Policy	Environment, Housing and Infrastructure Scrutiny Panel	Accept	Link	Link
P.36/2021 Amd. 82	Island Plan 2022-25: Approval – eighty-second amendment –	Deputy R Labey	Reject	Link	Link

Minister for the Environment
Consolidated Comments on P.36/2021



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	Policy GD5 [demolition and replacement of buildings]				
P.36/2021 Amd. 83	Island Plan 2022-25: Approval – eighty-third amendment – Quarrying and Air Quality Amendment to Policy MW1 [provision of minerals]	Deputy Morel	Reject	Link	Link
P.36/2021 Amd. 84	Island Plan 2022-25: Approval – eighty-fourth amendment – Amendment to Policy CI3 [Our Hospital]	Senator Moore	Accept	Link	Link
P.36/2021 Amd. 85	Island Plan 2022-25: Approval – eighty-fifth amendment – Policy EV1 [visitor accommodation]	Constable Jackson	Reject	Link	Link
P.36/2021 Amd. 85 Amd. 01	Island Plan 2022-25: Approval – eighty-fifth amendment – amendment	Senator Ferguson	Reject	Link	Link
P.36/2021 Amd. 85 Amd. 02	Island Plan 2022-25: Approval – eighty-fifth amendment – second amendment	Constable Jackson	Reject	Link	Link
P.36/2021 Amd. 86	Island Plan 2022-25: Approval – eighty-sixth amendment - St. Brelade's Bay Improvement Plan	Constable Jackson	Accept	Link	Link
P.36/2021 Amd. 87	Island Plan 2022-25: Approval – eighty-seventh amendment – Green Backdrop Zone and Shoreline Zone – Consolidated	Minister for the Environment, Deputy John Young	Accept	Link	Link
P.36/2021 Amd. 87 Amd. 01	Island Plan 2022-25: Approval – eighty-seventh amendment – amendment	Constable Jackson	Reject	Link	Link

Minister for the Environment
Consolidated Comments on P.36/2021



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P.36/2021 Amd. 88	Island Plan 2022-25: Approval – eighty-eighth amendment – Marine Spatial Plan	Minister for the Environment, Deputy John Young	Accept	Link	Link
P.36/2021 Amd. 88 Amd. 01	Island Plan 2022-25: Approval – eighty-eighth amendment – amendment	Senator Farnham	Reject	Link	Link
P.36/2021 Amd. 89	Island Plan 2022-25: Approval – eighty-ninth amendment – Historic Environment Policies	Minister for the Environment, Deputy John Young	Accept	Link	Link
P.36/2021 Amd. 89 Amd. 01	Island Plan 2022-25: Approval – eighty-ninth amendment – amendment	Deputy Huelin	Reject	Link	Link
P.36/2021 Amd. 89 Amd. 02	Island Plan 2022-25: Approval – eighty-ninth amendment – second amendment	Minister for the Environment, Deputy John Young	Accept	Link	Link
P.36/2021 Amd. 90	Island Plan 2022-25: Approval – ninetieth amendment – Overall housing supply	Minister for the Environment, Deputy John Young	Accept	Link	Link
P.36/2021 Amd. 91	Island Plan 2022-25: Approval – ninety-first amendment – Affordable housing provision – Consolidated	Minister for the Environment, Deputy John Young	Accept	Link	Link
P.36/2021 Amd. 91 Amd. 01	Island Plan 2022-25: Approval – ninety-first amendment – amendment [remove field H1248]	Deputy Le Hegarat	Reject	Link	Link
P.36/2021 Amd. 91 Amd. 02	Island Plan 2022-25: Approval – ninety-first amendment – second amendment [remove field O622 and O623]	Deputy Le Hegarat	Reject	Link	Link

Minister for the Environment
Consolidated Comments on P.36/2021



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P.36/2021 Amd. 91 Amd. 03	Island Plan 2022-25: Approval – ninety-first amendment – third amendment [remove field S341]	Constable Le Sueur-Rennard	Reject	Link	Link
P.36/2021 Amd. 91 Amd. 04	Island Plan 2022-25: Approval – ninety-first amendment – fourth amendment [include field J229]	Constable Jehan	Reject	Link	Link
P.36/2021 Amd. 91 Amd. 05	Island Plan 2022-25: Approval – ninety-first amendment – fifth amendment [include J236]	Constable Jehan	Reject (possible alternative site)	Link	Link
P.36/2021 Amd. 92	Island Plan 2022-25: Approval – ninety-second amendment – Policy H8 - Housing outside the built-up area	Minister for the Environment, Deputy John Young	Accept	Link	Link
P.36/2021 Amd. 93	Island Plan 2022-25: Approval – ninety-third amendment – Policy ME1 – 20% reduction in target energy rate	Minister for the Environment, Deputy John Young	Accept	Link	Link
P.36/2021 Amd. 94	Island Plan 2022-25: Approval – ninety-fourth amendment – Policy C11: Education facilities – consolidated	Minister for the Environment, Deputy John Young	Accept	Link	Link
P.36/2021 Amd. 95	Island Plan 2022-25: Approval – ninety-fifth amendment – Policy C15: Sports, leisure and cultural facilities	Minister for the Environment, Deputy John Young	Accept	Link	Link
P.36/2021 Amd. 96	Island Plan 2022-25: Approval – ninety-sixth amendment – Travel and transport policies	Minister for the Environment, Deputy John Young	Accept	Link	Link

Minister for the Environment
Consolidated Comments on P.36/2021



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P.36/2021 Amd. 97	Island Plan 2022-25: Approval – ninety-seventh amendment – Safeguarded minerals site: Simon Sand and Gravel	Minister for the Environment, Deputy John Young	Accept	Link	Link
P.36/2021 Amd. 98	Island Plan 2022-25: Approval – ninety-eighth amendment – Tabor Park [built-up area and over-55's]	Minister for the Environment, Deputy John Young	Accept	Link	Link
P.36/2021 Amd. 99	Island Plan 2022-25: Approval – ninety-ninth amendment – Minor Proposals Map Changes	Minister for the Environment, Deputy John Young	Accept	Link	Link
P.36/2021 Amd. 100	Island Plan 2022-25: Approval – one-hundredth amendment – Sustainable Communities Fund	Minister for the Environment, Deputy John Young	Accept	Link	Link
P.36/2021 Amd. 101	Island Plan 2022-25: Approval – one-hundred and first amendment – WER4 Land Reclamation	Minister for the Environment, Deputy John Young	Accept	Link	Link
P.36/2021 Amd. 102	Island Plan 2022-25: Approval – one-hundred and second amendment – Protecting landscape and seascape character	Minister for the Environment, Deputy John Young	Accept	Link	Link

Island Plan 2022-25: Approval – amendment – Removal of St Helier Fields

[\(Link to return to table\)](#)

The Minister is minded to **ACCEPT** this amendment.

This would serve to remove fields H1186A, H1189 and H1198 from the list of sites allocated for the provision of affordable homes, under Policy H5.

The Minister's position is set out in:

- i. Section 1.0 of the Minister's housing site position statement
- ii. [P.36/2021 Amd. 91: Affordable housing provision – Consolidated](#); and

The Minister's position is consistent with the recommendations of the planning inspectors, in their [report \(p.31-32 and 43\)](#).

Island Plan 2022-25: Approval – second amendment – Removal of St Saviour Fields

[\(Link to return to table\)](#)

The Minister is minded to **PARTIALLY ACCEPT** this amendment:

Part	Position	Additional comments, if any
Part (a) (i)	Reject	These fields (S413 and S415) are identified as part of the Minister for the Environment’s preferred housing sites, as set out in: i. Section 2.0 of the Minister’s housing site position statement
Part (a) (ii)	Reject	This field (S530) is identified as one of the Minister for the Environment’s preferred housing sites, as set out in: i. Section 2.0 of the Minister’s housing site position statement
Part (a) (iii)	Accept	See the Minister’s position, in relation field S729, as set out in: i. Section 1.0 of the Minister’s housing site position statement ii. P.36/2021 Amd. 91: Affordable housing provision – Consolidated

The Minister’s position is consistent with the recommendations of the planning inspectors.

The inspectors agree that field S.729 should be removed from the plan on the basis that it is not deliverable; and that the remaining fields in St Saviour should remain as designated affordable housing sites.

The inspectors consider that the benefits of allocating these sites at St Saviour, in sustainable locations for much needed affordable housing, outweigh any disadvantages. This is set out in their [report \(p.37-38\)](#).

Whilst the Minister intends to develop supplementary planning guidance for all affordable housing sites, the Minister has also specifically committed to develop a masterplan for the Five Oaks area. This is in recognition of the need to address key planning issues in the area, and to identify future opportunities for improvement. The development of new sites for homes in the area may better enable this to be achieved. Improvements might include:

- travel and transport improvements, particularly for active travel (walking and cycling);
- community facilities and open space provision; and
- future employment land opportunities.

Island Plan 2022-25: Approval – third amendment – Play Area Proximity

[\(Link to return to table\)](#)

The Minister is minded to **PARTIALLY ACCEPT** this amendment.

Part	Position	Additional comments, if any
Part (a)	Reject	<p>The Minister appreciates the objective of this amendment to reduce the travel distance for child occupants of a development so that they can more-easily access space which has been provided for their benefit. Whilst the Minister agrees with this principle, it ought to be highlighted that the travel distance proposed in the draft Bridging Island Plan has been set at a level which the Minister feels to be reasonably deliverable, having regard to the constrained availability of land in Jersey, and in particular, in St Helier. Reducing this distance will, therefore, inevitably increase the difficulty of meeting the objectives of the policy.</p> <p>The Minister acknowledges that the proposed reduced travel distances have been met with an additional clause (through part (b) of the amendment) to ensure that there is an alternative route to delivery should the provision of play space within the specified distance not be deliverable. This does go some way to improve the deliverability of the proposed amendment but is not without the risk that the clause will become the default answer and will, therefore, be open to an unlimited distance on the basis of justification. The original wording of the policy is more specific, at 10min/1000m and no alternative clause.</p> <p>On this basis, the Minister is not minded to accept part (a) and (b) of amendment 03. Policy CI8, as drafted, ensures the provision of play space at a more deliverable distance, and is more specific. This will lead to a more consistent outcome, to the benefit of children.</p>
Part (b)	Reject	<p>The Minister is supportive of the principle to develop a play strategy in collaboration with the Minister for Economic Development, Tourism, Sport and Culture, and the Minister for Children and Education, and notes the real benefit to the wellbeing of children which could be realised through such work. The deficiency of available play space across the island is well recognised, and any work to support the resolution of this issue is welcome, particularly as it will be complementary to the Policy CI8 and may support its effective implementation.</p>
Part (c)	Accept	<p>As the development of a play strategy would be helpful to the implementation of Policy CI8, the Minister is also supportive of the development of supplementary planning guidance in response. On this basis, the Minister is minded to accept part (c) and (d) of amendment 03.</p>
Part (d)	Accept	

The Minister's position is consistent with the recommendations of the planning inspectors where they agree that the policy, which seeks the delivery of space for children within 1,000m, is more reasonable than the 500m proposed by this amendment, as set in their [report \(p.62-63\)](#).

Island Plan 2022-25: Approval – fourth amendment – Use of Field P558 in St. Peter

[\(Link to return to table\)](#)

The Minister is minded to **ACCEPT** this amendment.

The Minister's position is subject to the site being brought forward as part of a comprehensive scheme with fields P559 and P632, as set out in:

- i. Section 2.0 of the Minister's housing site position statement; and
- ii. [P.36/2021 Amd. 91 Affordable housing provision – Consolidated](#).

The proposal to designate field P558 as part of a comprehensive development with fields P559 and P632 is consistent with the recommendations of the planning inspectors, as set in their [report \(p.36-37\)](#).

Island Plan 2022-25: Approval – fifth amendment – Children’s Play Space

[\(Link to return to table\)](#)

The Minister is minded to **ACCEPT** this amendment.

The Minister’s detailed position is set out in [SR 20 - Policy CI8 - Space for children and play amendments](#). In particular, the Minister welcomes **part (a) and (c)** of this amendment, which would provide additional clarity and emphasis to the type and effect of space that is being sought to the benefit of children.

The Minister notes that **part (b)**, seeking to introduce the word ‘safe’, would be a positive emphasis in the policy, but one which would need to be applied with pragmatism.

The planning inspectors noted and agreed the Minister’s views on this amendment ([recommendation 41: p.62-63](#)).

Island Plan 2022-25: Approval – sixth amendment – Education Estates

[\(Link to return to table\)](#)

The Minister is minded to **REJECT** this amendment.

The Minister's initial comments in relation to the education estate are set out in [SR 08 Policy CI1 - Capacity of education estate](#). Since this initial position was expressed in the summer of 2021, it was very much hoped that the review of the St Helier primary education estate would have been completed, and the Assembly would have therefore been in a position to make a very confident decision in relation to this amendment.

However, whilst there is a lack of clarity over the future of the primary education estate in town, the Bridging Island Plan is very capable of allowing the development of new and existing schools in the town area, and more broadly across the Island. This scope is extended to development in the countryside, should the Minister's own [amendment 94](#) be agreed, and would be further supported by the acceptance of Amendment 08, which seeks to safeguard the Jersey Gas site for this purpose (which the Minister is now minded to accept).

The Minister agrees with intent that drives this amendment, but also notes it has the potential to prevent development from taking place on publicly owned key sites committed for other purposes in and around St Helier, and that this restriction will be in policy for the duration of the plan period, rather than a finite period - until such a time that the needs are resolved - which is the effect of the separate proposition ([P.43/2021 \(as amended\)](#)).

This amendment 6 will go further, by also introducing a subjective requirement for all publicly owned sites within the vicinity of existing primary schools to demonstrate that the development will not compromise the ability to address identified education needs. Of course, when needs are identified, there will often be choices in how those needs should be addressed - this may or may not involve the nearby land in public ownership, and there may also be disagreement in what should happen and where it should happen.

It is not the role of the planning application process to mediate these requirements; it must be determined at a strategic level to ensure that the right development is happening at the right time and in the right place. It is important that these discussions are had within Government and the States, with appropriate decisions made before planning applications are submitted. This amendment, however, would cause the matter to be raised through various planning applications in an ad-hoc manner, which is not considered appropriate or helpful to ensure the strategic needs of education can be met.

It is stressed again that the intent which drives this amendment is agreed, but the amendment cannot be supported. Other decisions can and should be taken by the assembly to ensure the needs of the town primary education estate are addressed, and that information in this respect is made available as soon as possible.

Island Plan 2022-25: Approval – seventh amendment – Restriction of Parish Priority

[\(Link to return to table\)](#)

The Minister is minded to **ACCEPT** this amendment.

The Minister's detailed position is set out in [SR 25 - Policy H5 - Affordable homes and parish priority](#).

The object of this amendment is to establish parameters for the allocation of affordable homes on the basis of parish links, relative to those persons who won't necessarily have a parish link but could have equal or greater housing need.

The draft plan makes it clear that it seeks to ensure that affordable homes are provided to meet the whole island community's needs. This amendment will help to ensure that both our parochial needs – in particular, keeping families together in parish communities – and the wider needs of islanders can be met on sites rezoned for affordable housing.

The detailed definition of what constitutes affordable housing, and the criteria for eligibility and access to it, is determined by the Minister for Housing and Communities; and administered through the [Affordable Housing Gateway](#).

If the States are minded to support the proposed amendment, it would establish the parameters within which a parish allocation would need to operate on land rezoned for affordable housing, to which the Minister for Housing and Communities will need to have regard. The Minister for the Environment is satisfied that this is a reasonable and achievable response, that can be administered through an established process, in the form of the Affordable Housing Gateway.

Island Plan 2022-25: Approval – eighth amendment – Gas site Tunnell Street St Helier

[\(Link to return to table\)](#)

The Minister is minded to **ACCEPT** this amendment.

The Minister's initial comments in relation to the education estate are set out in [SR 08 Policy CI1 - Capacity of education estate](#). Since this initial position was expressed in the summer of 2021, it was very much hoped that the review of the St Helier primary education estate would have been completed, and the Assembly would have therefore been in a position to make a very confident decision in relation to this amendment.

However, whilst there is a lack of clarity over the future of the primary education estate in town, the Bridging Island Plan is already very capable of allowing the development of new and existing schools in the town area, including on the Jersey Gas site, should that be decided as a new site for a primary school.

If the education estate review had been concluded to identify the Jersey Gas site for a new primary school, there would have been little hesitation to designate the available part of land for this purpose, with the effect of any such designation being relatively benign in planning terms, given the site is already within the built-up area, and could be made compatible with the commitment to extend the town park (as set out in Policy CI6 Provision and enhancement of open space).

Decisions for future education facilities must be made strategically, and any decision the Assembly makes must be sure to be taken in the best interests of children. This includes their interests for education, balanced with the need to provide places to live and places for them to play, as the three key issues to consider when contemplating the development of the Jersey Gas site.

Whilst the information has not formally been made available from CYPES, it has recently been suggested in the States Assembly (see [Hansard \(5.4\)](#)) that the Jersey Gas site could indeed represent one of CYPES preferred options to provide for a new school. Whilst this is not as helpful as a decision, the Minister does take this new information into account in forming a final position in relation to this amendment.

As a result - and considering that Policy CI1 education facilities includes sufficient wording to allow the site to developed for alternative purposes if it can be demonstrated that the site is no longer required for education purposes - the Minister is satisfied that there appears to be good enough reason to safeguard this site for education at this time. This safeguarding would sit alongside the existing safeguard for part of the site to be utilised for a town park extension, as set out in Policy CI6.

It should be emphasised that this amendment seeking the site's inclusion in Policy CI1 only safeguards the site, it does not make the decision to build a new school here. The latter decision must come later, when all the facts and options have been considered and made available.

Should the primary estate review – or other decision of the States - conclude that this site should not be taken forward as a new school, then that decision will allow the release of the site under the auspices of Policy CI1, and allow alternative development to take place, such as a larger extension to the park, or for housing.

Island Plan 2022-25: Approval – ninth amendment – Springfield Development

[\(Link to return to table\)](#)

The Minister is minded to **ACCEPT** this amendment.

The Minister's detailed position is set out in [SR 14 - Policy CI5 - Springfield sports and leisure enhancement area](#).

This Minister's statement highlights the relevance of a previous decision of the Assembly - [P.67/2021 \(part \(a\) \(i\)\)](#) - which has a similar effect to the proposed amendment. It also considers the concerns raised by Jersey Sport about the ability for Springfield to be redeveloped to support the growth of site as the island's only football stadium, and in-turn supporting the continued success of Jersey Bulls football club.

The planning inspectors, in their [report \(p.60\)](#), agree with the Minister that the wording, as proposed to be amended, would allow for the interests of both the football club and the wider public to be catered for.

Island Plan 2022-25: Approval – tenth amendment – Nelson Street Car Park

[\(Link to return to table\)](#)

The Minister is minded to **ACCEPT** this amendment.

The Minister's detailed position is set out in [SR 11 - Policy CI4 - Community facilities and community support infrastructure amendment](#). In particular, the Minister notes that as the proposed Nelson Street site is within the built-up area, there is no specific planning need to make this designation as Policy CI4 already provides explicit support for this type of development in the built-up area.

The Minister does, however, recognise the benefit of designating the site to provide more assurance as to the delivery of this much needed facility, which is ultimately the responsibility of the Minister for Infrastructure

The planning inspectors, in their [report \(p.60\)](#), agree that this is a sensible approach.

Island Plan 2022-25: Approval – eleventh amendment – Field 630, St. Ouen

[\(Link to return to table\)](#)

The Minister is minded to **REJECT** this amendment.

The Minister's detailed position is set out in [SR 18 - Policy CI7 - Field O630 - protected open space designation](#). In summary, the Minister's statement sets out how the proposed designation of this land was assessed in the development of the draft Bridging Island Plan – which is not in the manner alluded to in this amendment - and that it was based on a local assessment of the area, as set out in the [Community facilities and open space: assessment of sites report](#) (p.45-46).

The Minister's statement also highlights that, because of its small size (0.14ha), field O630 would make only a minimal contribution to housing supply (of up to five homes), which will be further limited due to the proximity and impact upon neighbouring properties to the north and east.

It should also be recognised that the Minister has proposed the designation of land to deliver over 100 new homes in the within the parish of St Ouen, highlighting both: the limited justification to designate such a small site for its contribution to overall housing supply; and the need to safeguard land in the heart of the growing parish which can provide important visual and community amenity.

[P.36/2021 Amd. 91 Affordable housing provision – Consolidated](#) proposes:

- fields O594 and O595 (approx. 34 homes)
- fields O622 and O623 (approx.77 homes)
- Field O785 (approx. 20 homes)

The planning inspectors, in their [report \(p.62\)](#), note that representations received during the consultation show that the proposed protected open space designation has attracted widespread support. They consider that the Minister for the Environment makes a sound case for the retention of the designation of the land as protected open space.

The below illustrates the amount of protected open space designated in comparable village centres, in the extant Revised 2011 Island Plan (see green hatched areas within defined built-up area (white area)):



Island Plan 2022-25: Approval – twelfth amendment – Removal of Field H1219 St. Helier

[\(Link to return to table\)](#)

The Minister is minded to **REJECT** this amendment.

The Minister’s detailed position is set out in:

- i. Section 2.0 of the Minister’s housing site position statement;
- ii. [SR 26 - Policy H5 - Provision of affordable homes](#) (Appendix 3), and
- iii. [P.36/2021 Amd. 91 Affordable housing provision – Consolidated](#)

The planning inspectors, in their [report \(p.31-32\)](#), consider that the allocation of this site for affordable homes to be appropriate, noting also that this is perhaps the most sustainable site of all the proposed housing site allocations.

* It should also be noted that there is another amendment [P.36/2021 Amd\(78\)](#), which seeks to retain Field H1219 for housing, but to transfer its designation from a Policy H5 - affordable housing site, to Policy H6 - Supported housing, specifically to deliver fully-accessible homes for people with disabilities. This Minister is also minded to reject that amendment: his comments are set out in relation to that amendment specifically.

Island Plan 2022-25: Approval – thirteenth amendment – Trees and Water Features

[\(Link to return to table\)](#)

The Minister is minded to **ACCEPT** this amendment.

The Minister's detailed position is set out in [SR 45 - Policy NE2: Street trees and water features](#).

The Minister wholeheartedly supports the objectives behind this amendment and considers that it would help to achieve the objectives of placemaking, promoting biodiversity and mitigating the impacts of climate change.

The planning inspectors, in their report, acknowledge that this is a sensible change and recommend that it is made ([recommendation 28, \(p.52-53\)](#)).

Island Plan 2022-25: Approval – fourteenth amendment – Double Glazing

[\(Link to return to table\)](#)

The Minister is minded to **REJECT** this amendment.

The Minister has, however, lodged his own amendment ([P.36/2021 Amd. 89: Historic environment policies – consolidated](#)) which sets out how change can be managed in the historic environment to address the challenges of climate change.

The Minister's amendment sets out how proposals to improve energy efficiency where they affect historic windows and doors - including the use of double-glazing - will be supported where it can be demonstrated that they do not materially harm the special interest of a listed building.

The Minister's approach is supported by the planning inspectors, as set out in their [report \(p.55, recommendation 32\)](#) where they recommend some changes to strengthen the Minister's intention. The recommendation of the inspectors is reflected in the Minister's amendment ([P.36/2021 Amd. 89: Historic environment policies – consolidated](#)).

Island Plan 2022-25: Approval – fifteenth amendment – Corbière Walk

[\(Link to return to table\)](#)

The Minister is minded to **ACCEPT** this amendment.

The Minister's position is set out in [SR 19 - Policy CI7: Protected open space - Corbière Walk](#).

The Minister wholeheartedly supports the objectives behind this amendment and considers that it is consistent with the need to identify and protect important areas of public open space in the island.

This view is endorsed by the planning inspectors, in their [report \(recommendation 40, p.62\)](#).

Island Plan 2022-25: Approval – sixteenth amendment – Field MN410, St. Martin

[\(Link to return to table\)](#)

The Minister is minded to **REJECT** this amendment.

The Minister's detailed position is set out in:

- i. Section 2.0 and 5.0 of the Minister's housing site position statement;
- ii. [SR 26 - Policy H5 - Provision of affordable homes](#) (Appendix 5), and
- iii. [P.36/2021 Amd. 91 Affordable housing provision – Consolidated](#)

This site is considered to be appropriate as an affordable housing site and is proposed by the Minister for the Environment as such.

The planning inspectors agree with the Minister' view in relation to this site, as set out in their [report \(p.47-48\)](#)

This amendment seeks to transfer the allocation of the site to open market homes, for over-55s. The Minister considers, however, that the affordable homes policy has sufficient flexibility to include a proportion of homes accessible to over-55's for downsizing, where there is a proven local need; and where this will be secured through the provision in the policy which enables right sizing. Application of the right sizing provision on affordable housing sites will help to ensure the release larger homes back into the market, and thus support the increase in availability of family homes. This would not be secured with an open market development.

In addition, inadequate evidence of need for this number of over-55 homes has been presented to support the allocation of an entire site for this purpose. It is, therefore, more appropriate that the site is designated for affordable housing, with the right proportion of right-sizing homes subject to later consideration in supplementary planning guidance and tested through a planning application. The Minister's approach is supported by the planning inspectors.

Island Plan 2022-25: Approval – seventeenth amendment – Use of Field MN489 for Over-55's Homes

[\(Link to return to table\)](#)

The Minister is minded to **REJECT** this amendment.

The Minister's detailed position is set out in:

- i. Section 2.0 and 5.0 of the Minister's housing site position statement;
- ii. [SR 35 - Policy H6 - Rezoning request of Field MN489, La Longue Rue, St Martin for affordable over 55's homes](#)
- iii. [P.36/2021 Amd. 91 Affordable housing provision – Consolidated](#)

This site is not considered suitable for development to provide homes. The site is of relatively high landscape sensitivity and, therefore, easily damaged by development.

Although the site relates well to the sheltered housing development of La Court Clos, it clearly lies outside of the village envelope and any development of the site would not serve to consolidate or 'round-off' the built form of the village.

Access to the site is poor and would have to be taken through La Court Clos, and then onto parish by-roads, where there is a local one-way system.

The Minister considers, however, that the affordable homes policy has sufficient flexibility to include a proportion of homes accessible to over-55's for downsizing, where there is a proven local need; and where this will be secured through the provision in the policy which enables right sizing. The proposed development of other sites in St Martin, such as field MN410, could help meet this need.

The planning inspectors agree with the Minister's view to not support this site for the reasons outlined, as set out in their [report \(p.39\)](#).

Island Plan 2022-25: Approval – eighteenth amendment – Field L127

[\(Link to return to table\)](#)

The Minister is minded to **REJECT** this amendment.

The Minister's detailed position is set out in:

- i. Section 2.0 and 5.0 of the Minister's housing site position statement;
- ii. [SR 29 - Policy H5 - Rezoning request of Field L127, La Fraide Rue, St Lawrence for affordable homes;](#) and
- iii. [P.36/2021 Amd. 91 Affordable housing provision – Consolidated](#)

This site performs very poorly when compared to other sites, particularly as it is relatively remote from local facilities and does not relate well to the proposed local centres of Carrefour Selous or St Lawrence village.

There is a long history of agricultural use on this field, with multiple types of crops. Whilst not subject to agricultural conditions, the development of this site would be considered a significant loss to agriculture.

The site is visually prominent in the open countryside and would be harmful to the rural character of the area. The site cannot be served by mains drains and would need to rely on a holding tank to be "filtered into the existing system during the night hours (22.00-06.00)". This is not considered to be an acceptable drainage solution for the development of the site.

The planning inspectors' view of this site is consistent with the views of the Minister, and in particular, they highlight that accepting this amendment would be contrary to the fundamental spatial strategy of the draft Bridging Island Plan, as set out in their [report \(p.39\)](#).

Island Plan 2022-25: Approval – nineteenth amendment – St. Brelade’s Bay Improvement Plan Time Frame

[\(Link to return to table\)](#)

The Minister is minded to **ACCEPT** this amendment.

The Minister’s detailed position is set out in [SR60 - St. Brelade’s Bay Improvement Plan – timeframe.](#)

The Minister supports the establishment of a timeframe for work to be undertaken to develop the St Brelade’s Bay Improvement Plan. Any such timeframe needs, however, to be realistic and needs to allow appropriate time for the project to be undertaken, including appropriate community and stakeholder engagement.

The Minister considers that a timescale, of December 2023, is realistic and appropriate.

The Minister’s position is supported by the planning inspectors ([recommendation 46, p.69](#))

Island Plan 2022-25: Approval – nineteenth amendment – amendment

[\(Link to return to table\)](#)

The Minister is minded to **REJECT** this amendment to the amendment.

The Minister’s detailed position is set out in [SR60 - St. Brelade’s Bay Improvement Plan – timeframe.](#)

The Minister supports the establishment of a timeframe for work to be undertaken to develop the St Brelade’s Bay Improvement Plan. Any such timeframe needs, however, to be realistic and needs to allow appropriate time for the project to be undertaken, including appropriate community and stakeholder engagement.

A timescale of May 2022 does not allow sufficient time for the development of the St Brelade’s Bay Improvement Plan to be undertaken, following the approval of the new Island Plan: it is clearly unrealistic and inappropriate.

Planning inspectors support the Minister’s position in accepting a realistic timeline for the improvement plan, of December 2023, as set out in the original amendment ([see recommendation 46, p.69](#))

Island Plan 2022-25: Approval – nineteenth amendment – second amendment

[\(Link to return to table\)](#)

THIS AMENDMENT TO THE AMENDMENT HAS BEEN WITHDRAWN.

Island Plan 2022-25: Approval – twentieth amendment – Gigoulande Quarry

[\(Link to return to table\)](#)

The Minister is minded to **REJECT** this amendment.

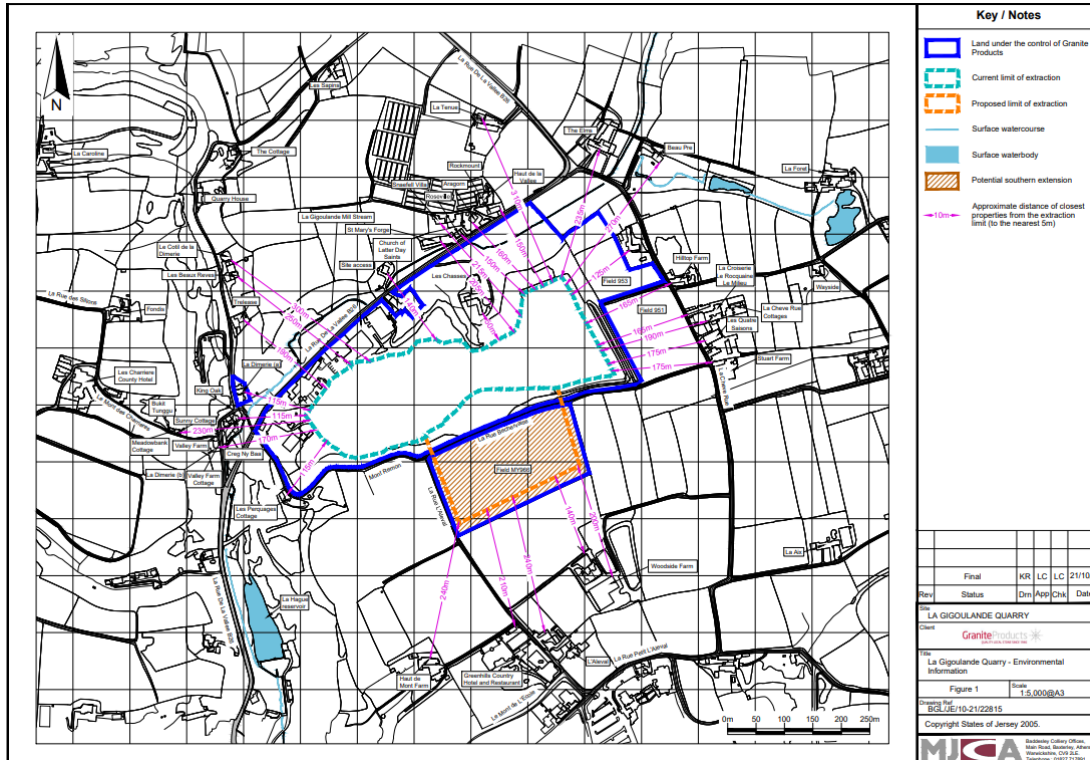
The Minister's detailed position is set out in [SR62 - Minerals: Zoning of Field MY966 and La Gigoulande Quarry safeguarded mineral area](#).

The Minister's proposal, as set out in the draft bridging Island Plan, to safeguard this site for mineral extraction, is supported by the independent planning inspectors, following their thorough scrutiny of the issue, at the examination in public; and having regard to the many representations that were made in relation to it ([pp.73-76, planning inspectors' report](#))

The key issues might be summarised as follows:

- the continued production of aggregates at La Gigoulande Quarry is required to meet the island's estimated needs for the next ten years or more
 - assuming that demand for crushed rock remains the same (at c.235,000t), there will be a potential shortage of on-island provision at the end of the next ten-year Island Plan (2026-2034)
 - if rates of demand are higher – as projected by Arup, at between 260-276,000t of crushed rock per annum - this challenge will arrive sooner.
- if a decision about the potential for expansion is delayed, current extraction of the remaining permitted reserves along the eastern side of the quarry would either have to cease in the near future; or potential access into MY966 from the existing quarry would be negated.
- in the longer term, different construction methods with a reduced carbon footprint may well offer the opportunity to reduce on-island quarrying. At present, however, there is no evidence that a major shift will take place in the near future; nor that the carbon footprint resulting from the importation of other materials would be substantially less. The importation of larger quantities of aggregates would pose some challenges for the Ports of Jersey.
- the use of recycled aggregates in Jersey is already relatively high – at about 40% - which helps reduce the demand for primary aggregates (i.e. rock and sand). Whilst there is scope to continue to increase production of recycled materials, these have some limitations and there will still be a requirement for primary aggregates for structural concrete.
- the environmental implications of expanded mineral extraction are recognised. The proposal in the draft plan, however, simply safeguards the site for mineral extraction. Permission to carry out mineral extraction at an expanded site would require planning permission, and a comprehensive environmental impact assessment, where all of the potential environmental impacts of expanded quarry operations would need to be researched in detail and assessed, to determine whether permission could be granted. These issues will only be assessed in the context of a planning application.
 - it is acknowledged that this will include bringing noise, vibration and dust closer to some residential properties and Greenhills Hotel, the loss of some trees and a less direct routing of La Rue Bechervaise. There are, however, properties that are currently within 115m of the existing operational quarry: the closest property to the expanded quarry is 140m away. Greenhills Country Hotel would be 210m away (as shown at appendix 1)
- the future use of La Gigoulande Quarry as an integrated minerals and waste asset (including extension of extraction into field MY966) rather than a water reservoir, better meets the island's needs.

Appendix 1: La Gigoulande Quarry – relationship of properties from existing and proposed quarry



Island Plan 2022-25: Approval – twenty-first amendment – Disability Inclusion – Active Travel

[\(Link to return to table\)](#)

The Minister is minded to **ACCEPT** this amendment, and the Minister has lodged his own amendment ([P.36/2021 Amd. 96: Travel and transport policies](#)) to give effect to both parts of the proposed amendment.

The Minister's detailed position is set out in [SR 42 - Disability inclusion in active travel](#).

The Minister's proposed changes have been endorsed by the planning inspectors ([see recommendation 54, pp.78-79](#)).

Island Plan 2022-25: Approval – twenty-second amendment – Disability Inclusion – Homes for Independent Living

[\(Link to return to table\)](#)

The Minister is minded to **ACCEPT** this amendment.

The Minister's detailed position is set out in [SR 38 - Disability inclusion - homes for independent living](#).

The need to give explicit consideration for people with disability is already recognised throughout the plan and is also referenced in the two policies proposed to be amended (Policy H6 and GD6). As set out in the preamble to the policy it is already clear that 'new housing must meet the diverse, specialised needs of people with disabilities, those requiring some degree of care, and vulnerable people in order to ensure equal access to housing and equitable social outcomes' (draft plan; supported housing policy preamble p. 194).

The Minister, however, recognises that the planning system needs to be inclusive and is content to give emphasis to the issue.

The proposed changes have been endorsed by the planning inspectors ([see recommendation 25, p.48](#)).

**Island Plan 2022-25: Approval – twenty-third amendment – Disability Inclusion –
Clauses**

[\(Link to return to table\)](#)

The Minister is minded to **ACCEPT** this amendment.

The Minister's detailed position is set out in [SR 05 - Disability inclusion - strategic and general policies](#).

The need to give explicit consideration for people with disability is already recognised throughout the plan and is also referenced in at least two of the policies proposed to be amended (Policy SP3 and SP7).

The Minister, however, recognises that the planning system needs to be inclusive and is content to give emphasis to the issue.

The proposed changes have been endorsed by the planning inspectors ([see recommendation 48, p.70](#)).

Island Plan 2022-25: Approval – twenty-fourth amendment – Disability Inclusion – Listed Building Accessibility

[\(Link to return to table\)](#)

The Minister is minded to **ACCEPT** this amendment, and the Minister has lodged his own amendment ([P.36/2021 Amd. 89: Historic environment policies - consolidated](#)) to give effect to it.

The Minister's detailed position is set out in [SR 41 - Disability inclusion in the historic environment](#).

The Minister's proposed changes have been endorsed by the planning inspectors ([see recommendation 30, p.54](#)).

Island Plan 2022-25: Approval – twenty-fifth amendment – Future Affordable Housing Provision

[\(Link to return to table\)](#)

The Minister is minded to **ACCEPT** this amendment **ONLY** if it is further amended, and has proposed his own amendment - see '[Island Plan 2022-25: Approval – twenty-fifth amendment – amendment](#)'

The Minister cannot accept amendment 25 in its original form and, therefore, seeks to further amend the amendment which will change the threshold at which the policy would apply (to developments of 50 or more homes); change the affordable housing contribution to affordable housing products; and increase the level of contribution to 15%.

The report for '[Island Plan 2022-25: Approval – twenty-fifth amendment – amendment](#)' provides the detailed explanation and justification of the changes proposed by the Minister.

Island Plan 2022-25: Approval – twenty-fifth amendment – amendment

[\(Link to return to table\)](#)

The Minister for the Environment is proposing this amendment.

The report for '[Island Plan 2022-25: Approval – twenty-fifth amendment – amendment](#)' provides the detailed explanation and justification of the changes proposed by the Minister.

Island Plan 2022-25: Approval – twenty-sixth amendment – Amendments to Policy H8, Policy SP2 and Policy PL5

[\(Link to return to table\)](#)

The Minister is minded to **REJECT** this amendment.

The changes proposed represent a significant challenge to the strong emphasis on countryside protection in the draft plan and the strategy of focusing development in sustainable locations. Extending flexibility to create homes in all buildings throughout the countryside, as the proposed amendment would do with the suggested change to Policy PL5 (second paragraph), would undermine the sustainability credentials of the draft plan.

More detail about the Minister's position is set out in his statement response ([Statement response 40 of his post-consultation report pp.138-144](#))

The inspectors consider the proposed amendment to be potentially damaging to the draft plan and do not support it either ([see pages 17-18; and p.49](#)).

The Minister for the Environment is, however, willing to give consideration to the introduction of some further but limited flexibility to this policy to enable the provision of additional households within existing, or extended dwellings in the countryside, where this can help to ensure that optimal use is made of existing housing stock.

The Minister has proposed his own amendment ([P.36/2021 Amd. 92: Policy H8 – Housing outside the built-up area](#)) to give effect to this. This would make best use of already developed homes and would have the potential to offer further support to, for example, multi-generational living, without creating undue strain upon the services and facilities in the countryside.

The Minister's approach, which is set out in detail in his statement response ([Statement response 40 of his post-consultation report pp.138-144](#)) has been endorsed by the planning inspectors, who have examined this issue as part of their independent review ([see pages 17-18](#), and [48-49](#), and [recommendation 26](#)).

Island Plan 2022-25: Approval – twenty-seventh amendment – Waterworks Valley

[\(Link to return to table\)](#)

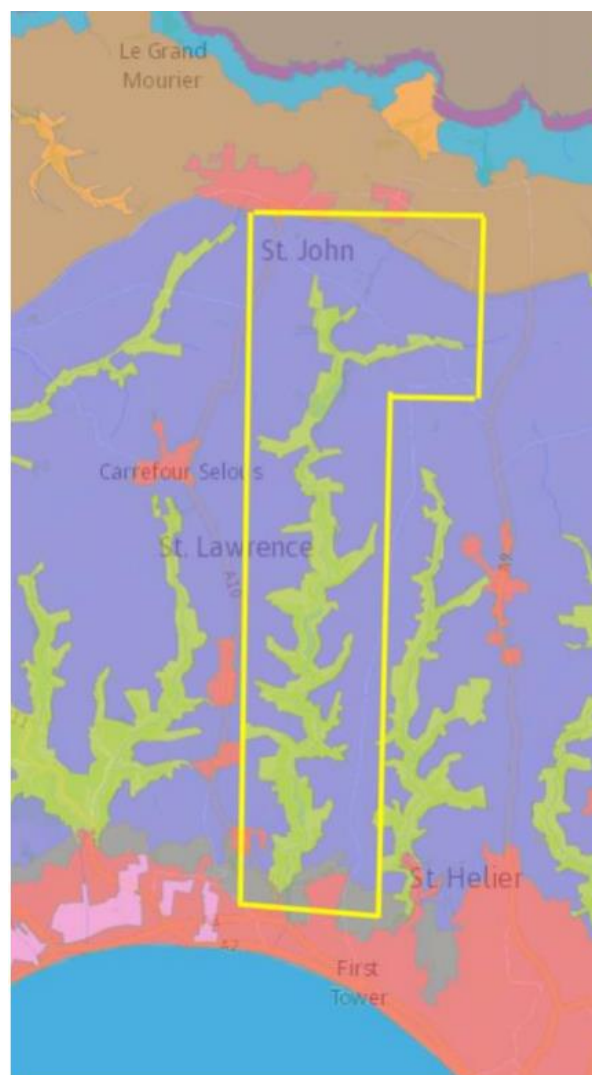
The Minister is minded to **ACCEPT** this amendment.

The Ministers detailed comments are set out in [SR 21 - Policy CI9 Waterworks Valley: countryside access.](#)

The Minister wholeheartedly supports the objectives behind this amendment and considers that it is consistent with the objective of promoting access to the countryside for islanders and of benefit to mental and physical health and wellbeing.

The Minister would encourage public access and awareness throughout Waterworks Valley and would seek to ensure that the area defined on the proposals map extends to the physical boundary of the valley beyond the northern end of Handois Reservoir (as indicated below).

This amendment also has the support of the planning inspectors, as set out in their [report \(p.63\).](#)



Island Plan 2022-25: Approval – twenty-eighth amendment – Traditional Farm Buildings

[\(Link to return to table\)](#)

The Minister is minded to **REJECT** this amendment.

The Ministers detailed comments are set out in [SR 57 - Policy ERE3 - Traditional farm buildings](#).

Whilst the Minister supports the intent of this amendment, any proposal that involves the change of use of surrounding agricultural land is already managed by other policies in the draft plan (Policies ERE1 and Policy H8) which achieve the objective of the amendment. The amendment is, therefore, unnecessary.

The Minister's position is endorsed by the planning inspectors, who also regard this amendment as unnecessary ([see p.69 of their report](#)).

Island Plan 2022-25: Approval – twenty-ninth amendment – First Time Buyers

[\(Link to return to table\)](#)

The Minister is minded to **REJECT** this amendment.

The Minister's detailed comments are available in [SR 28 - Policy H5 - Tenure mix on affordable housing sites.](#)

The Minister recognises that there is already a significant level of social-rented accommodation at Les Cinq Chenes, which is immediately adjacent to the sites proposed for new affordable homes in St Saviour (at fields S470 and S415A) and that, in order to ensure more resilient and mixed communities, a place-specific tailored approach to tenure mix may be appropriate here, having regard to the provision of affordable housing across the wider area.

The Minister is of the view, however, that there is adequate flexibility within existing Policy H5 which, whilst setting out the need to provide a tenure split of 45% social rent and 55% affordable purchase across all affordable housing sites; also enables an alternative mix of tenure to be provided where it:

- (i) can be justified, having regard to latest evidence of need
- (ii) enables the 'right-sizing' of homes within the existing housing stock; or
- (iii) can be justified relative to any other overriding justification.

This provides the ability to consider the appropriate tenure allocation on these fields - should they be approved for housing – in the development of supplementary planning guidance.

It is the Minister's view that no firm decision should be made as to the tenure on this site until the overall picture can be taken into account; particularly in relation to which other sites may be allocated for housing within the wider Five Oaks area, together with a need to consider the proposed redevelopment of Les Cinq Chenes. Supplementary planning guidance setting this out will be the subject of further consultation.

The inspectors considered the Minister's approach to deal with tenure allocation in guidance as being appropriate, in their [report \(p.37-38\)](#). This comment was made specifically in the context of the Minister's initial intent to remove reference to a tenure split from the policy, where the Minister has since resolved that there is sufficient flexibility to maintain the policy as drafted.

Island Plan 2022-25: Approval – thirtieth amendment – Coastal National Park

[\(Link to return to table\)](#)

The Minister is minded to **REJECT** this amendment.

The Ministers' detailed comments in respect of this amendment are set out in [SR 43 - Coastal National Park](#).

The Minister has also provided further justification more recently as to why change to the existing policy is needed to better protect the island's best and most sensitive landscapes (WQ.47/2022 [Jersey Coastal National Park Boundary Review](#)).

All of the matters raised by the amendment, and in representations about the proposed extension of the Coastal National Park (CNP), together with the Minister's own position on the matter, have been thoroughly considered by the planning inspectors at the examination in public.

The inspectors firmly support the Minister's position and have clearly concluded that the proposed extension of the CNP was based on sound evidence; appropriately captured the best parts of the island's landscape; and provided an appropriate way to better protect the island's best landscapes and seascapes ([see pages 49-53 of their report](#))

Despite this, it is evident that there remains a strong body of opinion that has not objectively considered the basis of and justification for the proposed extension of the CNP. It has inappropriately conflated issues which do not form any part of the Island Plan - related to land management and conferring public access – with the intention of the draft plan to better protect our best landscapes through planning policy; and to disregard the process of review, assessment and consultation.

This is unfortunate and presents a major risk to the plan's key objective of delivering enhanced protection for Jersey's very best landscapes. This is a critical element in the development of the draft bridging Island Plan, particularly when the draft plan is also required to release greenfield land for the development of affordable homes. The Minister is required to bring forward a sustainable development plan and this can only be achieved if the requirement for new development is balanced with better protection for the best and most outstanding areas of landscapes and seascape character in the bailiwick.

Because of this, the Minister for the Environment has set out an alternative approach in his own amendment ([P.36/2021 Amd 102 – Protecting landscape and seascape character](#)) which addresses – by entirely removing and negating the perceived threats associated with the extension of the CNP – to simply provide a new planning policy zone to protect the island's best areas of landscape and seascape character.

This will cover the area of the current and proposed extension to the Coastal National Park and will be called the Protected Coastal Area (PCA). The Coastal National Park will retain its current boundaries and simply become a planning zone within the Protected Coastal Area (PCA), where its landscape character will continue to enjoy the highest level of protection but also where development should be compatible with the purposes of the park. It will become a subset of the Protected Coastal Area (PCA).

The substance of part of Deputy Renouf's proposal, set out at part (d) of his amendment, to explore a statutory basis for the CNP is also captured and retained in the Minister's own amendment.

Island Plan 2022-25: Approval – thirty-first amendment – St. Helier Country Park

[\(Link to return to table\)](#)

The Minister is minded to **PARTIALLY ACCEPT** this amendment.

The Minister's detailed comments in respect of this amendment are set out in [SR 17 - Warwick Farm/ St Helier Country Park amendments](#). In summary, the Minister appreciates the desire of the Connétable of St Helier to ensure that the site is brought into a beneficial community use as soon as possible.

Part (a) of the amendment asks for the development of a country park to commence 'upon expiry of the present lease in 2023'. The matter of an extant lease on the site, raised in part (a) of the amendment, is important but is not a planning issue and is most appropriately addressed outside of the Bridging Island Plan review process (a more appropriate vehicle in which to have this important discussion may be the Government Plan: to establish a prioritisation to deliver the site at a given time; and to secure funding for the project to go ahead).

The Minister understands that the original break clause needed to be exercised by January 2022, to give effect to this part of the amendment. The status and validity of this part of the amendment is unclear; and is not a planning matter to be dealt with in the Island Plan, which is why the Minister is minded to **REJECT** part (a).

Part (b) of the amendment would require the Council of Ministers to establish a project board to develop proposals to be included in the next Government Plan in order that the St. Helier Country Park can be delivered during the period covered by the Bridging Island Plan. The Minister is generally supportive of part (b) as the establishment of a project board can usefully consider how to appropriately deliver the site, having appropriate regard to the issue of the extant lease, consider the role of enabling development, and to make use of the Government Plan as an appropriate vehicle to prioritise the work and source the necessary funding. However, due to the timing and issues highlighted in part a), the Minister is minded to **REJECT** part (b), on the basis that it is unlikely to be deliverable.

Part (c) would require the development of the country park to reflect an investigation and report by the Council of Ministers on opportunities to incorporate adjacent areas of countryside into the park in the future. The Minister is supportive of the amendment 31 (c), as this would be consistent with the Minister's aspirations set out in the Countryside Access Strategy (2016). The Minister is, therefore, minded to **ACCEPT** part (c) of the amendment.

The approach of the Minister is endorsed by the independent planning inspectors ([see p.61](#), para 6.17 and [recommendation 39](#)).

**Island Plan 2022-25: Approval – thirty-second amendment – Les Quennevais
Development**

[\(Link to return to table\)](#)

THIS AMENDMENT HAS BEEN WITHDRAWN.

The Minister was minded to **REJECT** this amendment.

Island Plan 2022-25: Approval – thirty-third amendment – Field J371, St. John

[\(Link to return to table\)](#)

The Minister is minded to **REJECT** this amendment.

The Minister's detailed comments are set out in [SR 16 - Policy CI6 - Provision and enhancement of open space - field J371, St John.](#)

The site lies within the defined built-up area and is also designated as protected open space, within both the extant Island Plan and the proposed Bridging Island Plan. The development of the site for public space would not be a particular challenge to those policies. As the land in question is in agricultural use, the loss of agricultural land would also need to be considered (Policy ERE1 - Protection of agricultural land).

The proposal to provide new public open space would have to demonstrate that the loss of agricultural land is outweighed by the benefit of the development. Furthermore, the benefit of providing car parking space on the site, as alluded to in the amendment, would need to be considered relative to the promotion of more sustainable modes of travel.

A designation for the provision and enhancement of open space would not override these considerations, as the plan must be taken as a whole.

On the basis of the site already being in the built-up area and designated as protected open space the Minister, therefore, considers it appropriate to leave the site without an additional designation, and to test any future proposal that may be brought forward by the Parish based on its relative merit and compliance with the plan through the process of a planning application, where these issues of competing interests can be properly assessed.

The planning inspectors regard the Minister's reasons for not supporting this amendment as sound, as set out in their [report \(P.62\)](#).



Island Plan 2022-25: Approval – thirty-fourth amendment – Field J229, St. John

[\(Link to return to table\)](#)

THIS AMENDMENT HAS BEEN WITHDRAWN

The Minister was minded to **REJECT** this amendment.

Island Plan 2022-25: Approval – thirty-fifth amendment – Field J236, St. John

[\(Link to return to table\)](#)

THIS AMENDMENT HAS BEEN WITHDRAWN

The Minister was minded to **REJECT** this amendment.

Island Plan 2022-25: Approval – thirty-sixth amendment – Field J939, St. John

[\(Link to return to table\)](#)

THIS AMENDMENT HAS BEEN WITHDRAWN

The Minister was minded to **REJECT** this amendment.

Island Plan 2022-25: Approval – thirty-seventh amendment – Aquaculture

[\(Link to return to table\)](#)

The Minister is minded to **ACCEPT** this amendment.

The Minister's detailed comments are set out in [SR 58 - Policy ERE8 - Aquaculture](#).

The significance of the island's aquaculture industry is recognised and supported by the draft plan, where a supportive policy regime is provided in the Royal Bay of Grouville aquaculture box.

It is not envisaged that there will be demand for the development of further aquaculture activities that cannot be met within the Royal Bay of Grouville aquaculture box during the plan period. As a consequence, the draft plan seeks to focus this form of development activity in Grouville and sets a policy presumption against the provisions of facilities elsewhere within the island's inter- or sub-tidal zone.

The proposed amendment seeks to shift the emphasis of the policy presumption against aquaculture development outside of the Royal Bay of Grouville aquaculture to one of conditional support, the effect of which is not considered to alter the policy intent. Any proposals outside of this area would need to be supported by an environmental impact assessment and a clear justification of need.

The planning inspectors support the Minister's position in relation to this amendment ([see p.69, para. 7.15, recommendation 47](#)).

Island Plan 2022-25: Approval – thirty-eighth amendment – Warehousing

[\(Link to return to table\)](#)

The Minister is minded to **REJECT** this amendment.

The Minister's detailed position in relation to this amendment is set out in [SR 56 - Economy - Industrial land \(Policy EI1\) - Rezoning of specific sites as protected industrial sites](#), where a number of sites proposed for industrial development are assessed and considered, including Bienvenue Farm in St Lawrence.

This site of Bienvenue Farm is within the green zone, developed with a variety of agricultural buildings, and next to a designated Protected Industrial Site (Thistlegrove).

However, whilst the site offers the potential expansion of the existing commercial complex, there is no clear justification at this time for the release of any such land, relative to local demand. Moreover, the location of this particular site, in a rural setting does not accord with the plan's spatial strategy and sequential test where preference would be given to sites of strategic significance that are well-located relative to the ports and the primary and secondary centres.

The designation of an enlarged protected industrial site, encompassing Thistlegrove, Bienvenue Farm and any other adjacent agricultural sheds and poly-tunnels would result in a site of considerable size; remote from the primary and secondary centres and with limited opportunities to encourage modes of sustainable transport to and from the site.

Any further intensification of existing and authorised commercial use would be more appropriately considered through a planning application and assessed against the relevant policies of the plan.

The independent planning inspectors are supportive of the Minister's position in relation to this site, where they state that '*While we consider there is a need for further industrial sites, this is not an appropriate location for such consolidation.*' ([see para. 7.6, pp.65-66 of their report](#)).

Island Plan 2022-25: Approval – thirty-ninth amendment – Conservation Areas

[\(Link to return to table\)](#)

The Minister is minded to **ACCEPT** this amendment.

The Minister's detailed comments are set out in [SR 49 - Conservation area priority](#).

The independent planning inspectors support the substance of the amendment but consider that St Helier should be identified as the priority area for conservation area designation given the large number of listed buildings in St Helier, the quality of the townscape and the pressure for development in Town ([see para. 5.8, recommendation 33 on page 56 of their report](#)).

The Minister accepts the recommendation of the planning inspectors and has sought to give effect to this through his own amendment ([P.36/2021 Amd.89](#))

Island Plan 2022-25: Approval – fortieth amendment – Field 559 Affordable Housing

[\(Link to return to table\)](#)

The Minister is minded to **ACCEPT** this amendment.

The Minister's position is subject to the site being brought forward as part of a comprehensive scheme with fields P559 and P632, as set out in:

- i. Section 2.0 of the Minister's housing site position statement; and
- ii. [P.36/2021 Amd. 91 Affordable housing provision – Consolidated](#).

The position to designate field P559 as part of a comprehensive development with fields P558 and P632 is consistent with the recommendations of the planning inspectors, as set in their [report \(p.36-37\)](#).

Island Plan 2022-25: Approval – forty-first amendment – States’ Owned Land

[\(Link to return to table\)](#)

The Minister is minded to **ACCEPT** this amendment **ONLY** if it is amended by further amendment - see '[Island Plan 2022-25: Approval – forty-first amendment - amendment](#)'

Following the Minister’s initial consideration of this amendment, as set out in [SR 27 - Policy H5 - States owned land](#), and subsequent consideration of the planning inspector’s views - which agreed that this amendment is too prescriptive in its present form but that a more nuanced approach may be appropriate (see their [report p.45](#)) - the Minister for the Environment has proposed his own further amendment to amendment 41.

Island Plan 2022-25: Approval – forty-first amendment – amendment

[\(Link to return to table\)](#)

The Minister for the Environment is proposing this further amendment.

The [report](#) provides the detailed explanation and justification of the changes proposed by the Minister.

Island Plan 2022-25: Approval – forty-second amendment – Transport and Parking

[\(Link to return to table\)](#)

The Minister is minded to **PARTIALLY ACCEPT** this amendment.

The Minister's detailed response to this amendment is set out in [SR 61 – Parking](#).

This amendment is in three parts.

Part (a): The Minister is minded to **ACCEPT** part (a) which seeks to ensure that the provision of parking space is considered as an integral part of any assessment of the density of residential development. The Minister has proposed further enhancement of this to support the intention of the Connétable's amendment: this is set out in the Minister's own amendment ([P.36/2021 Amd.96: Travel and transport policies – consolidated](#)).

This change, originally proposed by the Connétable, and supplemented by the Minister, is supported by the independent planning inspectors ([see recommendation 19, p.44 of their report](#)).

Part (b) of the amendment seeks to require the Minister to bring supplementary planning guidance about parking standards to the States Assembly for approval, together with the Minister for Infrastructure's forthcoming Parking Strategy. This is considered to be neither necessary or appropriate, and the Minister is minded to **REJECT** part (b) of the amendment.

As part of the development of any supplementary planning guidance for sustainable transport zones, the Minister for the Environment will consult the Minister for Infrastructure; the relevant parish(es); stakeholders and members of the public.

The Minister's approach is supported by the independent planning inspectors, following their examination of the matter ([see para. 10.7 on page 79 of their report](#)).

Part (c): the effect of part (c) of the amendment would be to allow the provision of private off-street car parks, as a separate form of development, in St Helier. This is considered to be neither necessary or appropriate, and the Minister is minded to **REJECT** part (c) of the amendment.

The Minister of the Environment is of the view that the provision and management of new public parking space in the island as a specific form of development should be addressed through the development of the parking plan being prepared under the auspices of the STP (Sustainable Transport Policy).

In the meantime, and to help deliver the STP objectives of seeking to reduce the impact of vehicles and to create more space for people in Town, the draft Island Plan seeks to ensure that the development of new off-street parking (where it is not directly related to a form of development) is limited to 'meanwhile' use of land for short-stay (shopper) parking.

The independent planning inspectors agree with the Minister's position that: *'the amendment to Policy TT4 that seeks to allow additional off-street parking in Town for residents and*

shoppers is a matter that should be dealt with in a comprehensive way in the parking plan work stream. ([see para. 10.7 on page 79 of their report](#))

Island Plan 2022-25: Approval – forty-third amendment – Les Quennevais

[\(Link to return to table\)](#)

The Minister is minded to **ACCEPT** parts (a) and (b) of this amendment **ONLY** if they are further amended - see '[Island Plan 2022-25: Approval – forty-third amendment – Amendment](#)'.

The Minister's detailed comments on this amendment are set out in [SR 03 - Les Quennevais - role and development](#).

Part (a) of the amendment seeks to remove reference to higher densities of development being sought in Les Quennevais. The principle of delivering higher density of development, through the redevelopment of already developed land, is a fundamental tenet of the entire plan, and has application throughout the island's built-up areas.

The draft plan does not, however, propose the unfettered densification of built-up areas, including Les Quennevais, with densities of development that are unsuited or inappropriate to the local context and character of the area. The plan already provides appropriate checks, through a range of policies, to manage this.

The Minister's further amendment of **part (a)** seeks to provide further clarification of this to ensure that any redevelopment has regard to and respects local context and character.

Having examined the issue raised by the amendment, the independent planning inspectors support the Minister's position. They state: '*We do not accept that reference to higher densities should be deleted given the status of Les Quennevais in the settlement hierarchy*' ([see para. 2.17 on page 17 of their report](#)).

Part (b) of the amendment seeks to replace reference to a 'planning framework', with a 'masterplan' and to impose a timescale on its production.

The draft plan already proposes the development of a west of island planning framework, to help identify the development opportunities and development needs of this part of the island, at a strategic level. This is identified as a strategic proposal, which confers a priority on this work to be undertaken early on in the bridging plan period, and to be undertaken before 2025.

The Minister acknowledges that it may also be beneficial for local residents, business and other stakeholders to be involved in helping to shape the future of their community at a more detailed local level, and the Minister proposes that any overarching planning framework might be supplemented by one or more area-specific masterplans, as identified and required. The Minister's further amendment seeks to give effect to this at part (b), including a requirement for the work to be carried out before 2025.

The inspectors have stated, in relation to the original amendment and the Minister's comments on it that: '*there is no reason why a framework should not prove to be a major advantage in directing and controlling development in a way that will adequately take into account the impact on St Helier. Bearing in mind resources, it is not unreasonable for the Minister to resist the call for a masterplan to be prepared by 2023*' ([see para. 2.9-2.10 on pages 15-16 of their report](#)).

Part (c): The Minister is minded to **ACCEPT** part (c) of the amendment. The inspectors consider this part of the amendment to provide helpful clarification ([see para. 2.11 and recommendation 1 on p.16 of their report](#)).

Island Plan 2022-25: Approval – forty-third amendment – amendment

([Link to return to table](#))

The Minister for the Environment is proposing this further amendment.

The report provides the detailed explanation and justification of the changes proposed by the Minister.

Island Plan 2022-25: Approval – forty-fourth amendment – Policy H4

[\(Link to return to table\)](#)

The Minister is minded to **ACCEPT** this amendment **ONLY** if it is further amended - see [‘Island Plan 2022-25: Approval – forty-fourth amendment - amendment’](#)

The Minister provided initial views about housing mix to meet right-sizing demand in his statement responses [SR 24 - Policy H4 - Right-sizing](#) and [SR 39 - Demand for over 55’s /right-sizing homes.](#)

This was considered by the planning inspectors, who in their [report \(see p.45\)](#), provide support for the amendment. They recommend, however, that a further change is made to introduce a threshold of development – of four homes and above - for the operation of the policy. This would serve to ensure that the policy is most appropriately applied to an appropriate scale of development that is best able to provide a mix of housing types.

The Minister is minded to accept the inspectors’ recommendation about the introduction of a threshold for the operation of the policy – but to insert his own standard of five or more homes; and to include additional wording to ensure that this requirement is only applied ‘where appropriate’, thus protecting developments sites which are most appropriately suited to the development of family homes. The Minister’s amendment to the amendment gives effect to these proposed changes.

Island Plan 2022-25: Approval – forty-fourth amendment – amendment

[\(Link to return to table\)](#)

The Minister for the Environment is proposing this further amendment.

The report provides the detailed explanation and justification of the changes proposed by the Minister.

Island Plan 2022-25: Approval – forty-fifth amendment – Night-Time Economy

[\(Link to return to table\)](#)

The Minister is minded to **REJECT** this amendment.

The Minister's detailed comments are set out in [SR 03 - Les Quennevais - role and development](#).

This amendment is proposed by the Connétable of St Brelade *'in order to give residents of the area the confidence that their present peaceful lives won't be compromised by a 'night-time economy' and the associated problems inevitably associated.'*

The concern expressed by the Connétable, whilst understandable, is considered to be misplaced for a number of reasons:

- Policy ER4 makes it clear that support for daytime and evening economy uses in the defined centre at Les Quennevais. The defined centre at Les Quennevais is a tightly defined area around the existing commercial area of Les Quennevais (see appendix 1), which is predominantly in employment-use.
- given the changing nature of retail and the function of shopping centres, including Les Quennevais, it is considered appropriate to enable the provision of non-retail activities – such as daytime and evening economy uses - to help support their attractiveness and vitality as places to visit.

By removing Les Quennevais from this policy it will preclude the development of the following forms of development there: arts and cultural venues, restaurants, cafés, food and drink takeaways, public houses, bars and nightclubs. Taken together, these facilities represent and are known as daytime and evening economy uses.

- it is acknowledged that evening economy uses in particular, can have adverse implications for neighbouring uses in particular, which is why the policy provision in the draft plan seeks to ensure that their development is only supported where they do not have an unacceptable impact on those neighbouring uses.

Planning permission would still need to be secured for any daytime or evening economy uses, where the potential impact on neighbours would be a key planning consideration.

The exclusion of the defined centre of Les Quennevais from Policy ER4 - Daytime and evening economy uses, is not supported by the independent planning inspectors ([see para. 2.8-2.10 on pages 15-16 of their report](#)).

Appendix 1: the defined centre of Les Quennevais



Island Plan 2022-25: Approval – forty-sixth amendment – Driveways

[\(Link to return to table\)](#)

The Minister is minded to **ACCEPT** this amendment.

The Minister's detailed comments are set out in [SR 04 - Policy GD3 – POA's Driveways](#).

The Minister acknowledges that the activity of development can have an impact upon the local area, and that local highway infrastructure can be damaged by heavy construction traffic. Island Plan policy can be used to expand upon the basis for the use of planning obligation agreements, but the issue is essentially an operational matter, and the use of planning obligations is established in law.

The Minister is, however, content to give emphasis to this matter on the face of the policy.

The proposed change is supported by the planning inspectors ([see recommendation 49 on page 70 of their report](#)).

Island Plan 2022-25: Approval – forty-seventh amendment – Warwick Farm

[\(Link to return to table\)](#)

The Minister is minded to **REJECT** this amendment.

The Minister's detailed comments in respect of this amendment are set out in [SR 17 - Warwick Farm/ St Helier Country Park amendments](#).

In summary, the Minister considers there to be sufficient flexibility in the draft Bridging Island Plan to ensure that the development of a country park takes place at a time which is appropriate, and that there is adequate provision to ensure that any such displaced business activity can be accommodated elsewhere. The Minister is, therefore, minded to reject the amendment; and to retain the proposal for the next use of Warwick Farm to be a country park, to the benefit of the community.

The planning inspectors have considered this amendment and conclude that the decision to retain the proposal for the future development of this site as a country park to be correct given the long-standing commitment to consider the development of a country park in this part of the island. They do not, therefore, support this Amendment 47, as set out in their [report \(see p.61\)](#).

Island Plan 2022-25: Approval – forty-eighth amendment – Tall Buildings

[\(Link to return to table\)](#)

The Minister is minded to **REJECT** this amendment.

The Minister's position is set out in [SR 07 - Policy GD7 - Tall buildings](#).

The Minister supports the sentiments behind this proposed amendment, such that the impact of taller and larger development needs to be appropriately considered relative to its context. He also acknowledges that the impact of the pandemic, and the changes that it has brought to ways of working in particular, may reduce the demand for office floorspace.

The Minister is of the view, however, that the proposed amendment is unduly restrictive and onerous, for the following reasons.

- first, the draft plan seeks to direct most of the island's development to existing built-up areas and, in so doing, seeks to ensure the most efficient use of land that is already developed. The potential to increase the height of buildings can help to play a role in this.
- second, the policy, as drafted, sets out a range of tests, supported by detailed guidance for the Town of St Helier, to ensure that the development of taller buildings is appropriate to its context.
- third, it is clear that St Helier has evolved and grown and now presents a range of building heights. The height of the historic town is around 3-3.5 storeys, but 20th Century additions have grown much taller in places, up to 14 storeys in a few notable locations, and in places like the waterfront and the Esplanade development at 6-8 storeys has become the norm. Setting this threshold too low - with anything over this height requiring exceptional justification - will serve to undermine the policy objectives of the plan; and is not appropriate for the context of the town.

The Minister's position is supported by the independent planning inspectors, following their thorough consideration of this issue at the examination ([see paras. 8.8 - 8.10 on page 71 of their report](#)). They state that:

'On balance, we think the criteria in the policy are adequate to protect the built environment across the island and would not create a blanket carte blanche to develop high buildings as feared by some. The policy accords with the general strategy of the DBIP to concentrate development in the urban areas and make the best use of brownfield land. While mindful of some of the problems buildings higher than four to five storeys can create, we consider that the policy is reasonable and is recommended for adoption as drafted.'

Island Plan 2022-25: Approval – forty-ninth amendment – Field MY563, St. Mary

[\(Link to return to table\)](#)

The Minister is minded to **ACCEPT** this amendment.

The Minister's position is set out in:

- i. Section 2.0 of the Minister's housing site position statement; and
- ii. [P.36/2021 Amd. 91 Affordable housing provision – Consolidated.](#)

The planning inspectors have considered the inclusion of this site for affordable housing under Policy H5 and support its inclusion in order to meet overall housing supply and meet local demand, as set out in their [report \(p.34-35\)](#).

Island Plan 2022-25: Approval – fiftieth amendment – Field MY493, St. Mary

[\(Link to return to table\)](#)

The Minister is minded to **REJECT** this amendment.

The Minister's position is set out in:

- i. Section 3.0 of the Minister's housing site position statement; and
- ii. [SR 34 - Policy H5 - Rezoning request of Field MY493, La Route de L'Eglise, St Mary for affordable homes](#)

In summary, the Minister cannot support the development of this site for affordable homes, as the site is considered to form part of the group of the fields in the 'inner core' of the village which give the village much of its character which are important in allowing unimpeded views and helping to form an uncluttered landscape setting to core historic buildings. As such, development on this site would cause significant adverse landscape and visual impacts.

The land is subject to agricultural land conditions A and B, and its loss would be considered significant. It is a good field attached to a large block of land loss of this would also impact on viability of remaining fields in block.

There are poor public transport links, and the downstream drainage system does not have any spare capacity.

The planning inspectors have considered this site and concluded that this open land provides the village with much of its character and also serves to allow views of historic buildings including the church in the heart of the village. They conclude that the Minister is right not to support the development of this site, as set out in their [report \(p.40\)](#).

Island Plan 2022-25: Approval – fifty-first amendment – Marine Park

[\(Link to return to table\)](#)

The Minister is minded to **PARTIALLY ACCEPT** this amendment.

The Minister is minded to **ACCEPT Parts 1 (a) and (b)** of the proposed amendment **ONLY**. The Minister has lodged his own amendment to give effect to this ([P.36/2021 Amd. 88](#)).

The Minister is, however, minded to **REJECT** all other parts of the amendment including **Part 1.(c); Part 2.(a) and 2.(b); and Part 3.(a) - (f)**.

The Minister's position is set out in detail in [SR 53 - Creation of a Marine Park](#).

In summary, the Minister recognises and supports the need to develop a marine spatial plan for Jersey's territorial waters as soon as possible; and is also supportive of the objective of developing a sustainable fishery in Jersey's waters. This why the Minister for the Environment is able to support parts 1 (a) and (b) of the proposed amendment, which imposes a timetable on the development of a marine spatial plan; and which gives emphasis to the opportunity that this provides to develop a network of marine protected areas, to complement those that Jersey already has.

The effect and objective of the remainder of the amendment is, however, misplaced.

It is essentially seeking to use a development plan to give effect to the protection of high value marine habitats, not just from development activities – which is what the plan already does – but from other activities, such as fishing, which is not managed or regulated by the planning system.

The development of a marine spatial plan – which addresses all activities that happen in the marine environment, including fishing and aquaculture, renewable energy, shipping, leisure, as well as planning for development – is considered to be the best way to develop an integrated policy framework for Jersey's marine environment. This would need to involve and engage all stakeholders with an interest in these areas, including local and French fishers who currently enjoy access to the island's waters.

Proposing the creation or designation of a marine park or proposing to further extend the Coastal National Park to embrace areas of high value marine habitats in the Island Plan – which is what the amendment seeks to do - will not serve to protect valuable and sensitive marine habitats from destructive fishing practices. Fishing practices do not constitute development and cannot, therefore, be regulated by the planning system, and policy about them cannot be affected through the Island Plan, which is a development plan.

The Minister for the Environment's approach to this amendment – to accept parts 1 (a) and (b); and to reject all other parts, is endorsed by the independent planning inspectors ([see paras. 4.11-4.12 and recommendation 27 on pages 51-52 of their report](#)). They state that '*At the present time, the Minister's proposal to deal with the marine environment comprehensively with full consultation as part of the MSP seems prudent.*'

Island Plan 2022-25: Approval – fifty-first amendment – amendment

[\(Link to return to table\)](#)

The Minister is minded to **REJECT** this amendment to the amendment.

This amendment to an amendment seeks to do two things:

1. To designate marine protected areas covering at least 30 per cent of Jersey's waters by 2025.
2. To request that the current and future network of marine protected areas would constitute a national marine park.

As the Minister for the Environment has set out in his detailed comments on the original amendment, marine protected areas (MPAs) are essentially designated under the OSPAR convention and given effect through local fisheries legislation. In any event, Jersey is required to abide by the terms of the UK/EU TECA before introducing fisheries conservation measures. These measures need to be made on the basis of marine research and evidence, and subject to scrutiny by the EU and its specialist committees. To adopt the proposition unilaterally in this respect, in advance of internationally agreed procedures, cannot be recommended.

It is understood that the local fishing industry (represented by the JFA) do not support this proposal as currently drafted.

In considering anything of this nature, through more appropriate means, it is also required that a more targeted approach be taken.

The process of defining the extent and designating MPAs; and the regulation of activities within them (i.e. fishing), clearly sits outside of the scope of the Island Plan, the purpose of which is prescribed by the Planning and Building (Jersey) Law and is clearly focused on the regulation of development activity.

Similarly, the notion of a national marine park designation has no basis or meaning in local planning legislation.

The proposed amendment to the amendment is both inappropriate and ineffectual.

Island Plan 2022-25: Approval – fifty-second amendment – Coastal National Park Exclusion

[\(Link to return to table\)](#)

The Minister is minded to **REJECT** this amendment.

The Minister's position on this amendment is set out in [SR 46 - Coastal National Park: change to Grouville boundary](#).

In summary, the Minister does not consider it appropriate to amend the Island Plan simply to ease the assessment process of an emergent development proposal. The definition of the Coastal National Park should be based on the methodology employed to assess the island's areas of best landscape and seascape value, and not adjusted in relation to development proposals.

Any proposal to develop a pétanque pitch, whether it is within the Coastal National Park or in the green zone, will be tested under the same policy provisions of Policy NE3: Landscape and seascape character, to demonstrate that the proposal does not harm the landscape character of the area.

The Minister for the Environment's approach to this amendment is endorsed by the independent planning inspectors ([see para. 4.14 on pages 53 of their report](#)). They state that *'The road provides a logical boundary for the CNP and inclusion within the Park would not preclude the provision of a pétanque court, subject to consideration of the visual impact of the proposal on the landscape of the CNP under Policy NE3. We consider there is no justification for the proposed boundary change.'*

Island Plan 2022-25: Approval – fifty-third amendment – St. Brelade’s Shoreline

[\(Link to return to table\)](#)

THIS AMENDMENT HAS BEEN WITHDRAWN

The Minister was minded to **REJECT** this amendment.

Island Plan 2022-25: Approval – fifty-fourth amendment – St. Brelade’s Bay

[\(Link to return to table\)](#)

THIS AMENDMENT HAS BEEN WITHDRAWN

The Minister was minded to **REJECT** this amendment.

Island Plan 2022-25: Approval – fifty-fifth Amendment – St. Brelade's Parking

[\(Link to return to table\)](#)

THIS AMENDMENT HAS BEEN WITHDRAWN

The Minister was minded to **REJECT** this amendment.

Island Plan 2022-25: Approval – fifty-sixth Amendment – St. Brelade's Workers' Accommodation

[\(Link to return to table\)](#)

THIS AMENDMENT HAS BEEN WITHDRAWN

The Minister was minded to **REJECT** this amendment.

Island Plan 2022-25: Approval – fifty-seventh Amendment – Tourist Economy and Public Amenities

[\(Link to return to table\)](#)

The Minister is minded to **REJECT** this amendment.

The Minister's detailed comments are set out at [SR 51 - St. Brelade's Bay – Development](#).

The Minister considers that both parts of this amendment to be flawed and inappropriate within the context of the planning system and the Island Plan.

In relation to part (a), the preamble to the policy makes clear of the reasonable expectations of any marketing of daytime and evening economy uses, and this is supported by supplementary planning guidance. The proposed amendment imposes unduly onerous and inappropriate level of prescription which cannot be legitimately affected and is without justification. The proposed amendment also appears to preclude visitor accommodation.

The second part of the amendment seems to propose the introduction of some form of functional test for employment-use development proposals. The Minister is of the view that there is no public interest in any such assessment, and it is not a function of the planning system to undertake such.

Following their examination of the changes proposed by this amendment, the independent planning inspectors support the Minister's position and they state that: '*such requirements would be unduly onerous in the context of the DBIP and preclude visitor accommodation.*' ([see para. 7.17 on page 69 of their report](#)).

Island Plan 2022-25: Approval – fifty-seventh amendment – amendment

[\(Link to return to table\)](#)

The Minister is minded to **REJECT** this amendment to the amendment.

The Connétable of St Brelade's further amendment to his own amendment seeks to add provisions to this policy – which deals with proposals affecting daytime and evening economy uses across the island – that only relate to St Brelade's Bay; and which would require the following:

1. for the market test of any existing daytime or evening economy use, where it is subject to a proposals to change the use of the premises, to have specific regard to the potential refurbishment or redevelopment of the premises for the same purpose; and
2. for proposals for changes to daytime or evening economy uses to be subject to some form of functional design test, as part of the planning process.

The Minister considers that both parts of this further amendment to be flawed and inappropriate within the context of the planning system and the Island Plan.

First, it is implicit that any market test for an employment use will be based on the potential for that use to continue within its current form; in a refurbished form; or through its redevelopment. In planning terms, the principle of a market test is to determine whether the employment-related use of that land or building is still required by the relevant industry. It is

a matter for the private sector to determine in what form any such use might be viable. Any physical changes to land or buildings would be regulated in the normal way, through the planning system.

Second, as stated in relation to the original amendment, any requirement for the introduction of some form of detailed functional test for employment-use development proposals is not considered to be a function of the planning system, and there is no public interest to undertake such.

And finally, it is not considered necessary or justified to have specific policy provisions relating to St Brelade's Bay where there is no specific justification to do so.

Island Plan 2022-25: Approval - fifty-eighth Amendment – St. Brelade's Bay Development

[\(Link to return to table\)](#)

The Minister is minded to **PARTIALLY ACCEPT** this amendment.

The Minister is minded to **REJECT Part (a)** of this amendment. Whilst inevitably well-intentioned, the Minister considers this part of the proposed amendment to be, in its various sections, unnecessary and inappropriate; but that the intention of the proposed changes could be realised in better, more effective ways. The Minister has lodged his own amendment to make changes which are considered to reflect the spirit of the amendment. This is set out in the Minister's amendment [P.36/2021 Amd. 87: Green backdrop zone and shoreline zone – consolidated](#).

The Minister is minded to **ACCEPT Part (b)** of the proposed amendment. This change is also given effect in the Minister's own amendment [P.36/2021 Amd. 87: Green backdrop zone and shoreline zone – consolidated](#).

The Minister's detailed comments are set out at [SR 51 - St. Brelade's Bay – Development](#).

Part (a): In summary, part (a):

- is unnecessary because there is no requirement or justification to specify views for specific parts of the island on the face of a universal policy dealing with views.
- proposes changes to the policy which are both unduly restrictive to change in the built-up area, particularly in relation to private residential development, and not supported by evidence or analysis;
- is flawed in its objective on the basis that it fails to embrace visitor accommodation and that any proposal to redevelop visitor accommodation would not be subject to the provisions of the proposed amendment. There are a number of hotels that sit within the shoreline zone;
- is inappropriate and unjustified where it seeks to:
 - protect private views from visitor accommodation (as specified in the third bullet of the amendment); or
 - preclude the provision of housing development within this part of the built-up area.

The Minister's position in relation to both parts of this amendment are supported by the independent planning inspectors. They also support the Minister's own changes, as set out in his consolidated amendment ([see paras. 8.11-8.12 and recommendations 51 and 52, on page 72 of their report](#)).

Island Plan 2022-25: Approval - fifty-ninth amendment – St. Brelade's Community Participation

[\(Link to return to table\)](#)

The Minister is minded to **REJECT** this amendment.

The Minister's initial comments in relation to this amendment are set out in [SR 06 - St. Brelade's Bay - Community participation](#). In summary, the Minister disagrees with each part of this amendment for the following reasons:

Part (a): The suggested requirement for an independent valuation verification of a percent for art contribution is considered to be unduly onerous, unnecessary and unjustified. This part of the proposed amendment also seeks to ensure that the public can comment on public art proposals. These are operational issues associated with the planning application process and are dealt with by the existing legislation for the publication of planning applications and most appropriately dealt with by operational practice guidance issued by the IHE (Regulation).

Part (b): The objective of both the Island Plan and indeed the island's planning legislation, is to ensure that development proposals are exposed to appropriate levels of public and stakeholder scrutiny, and that decision-makers take all representations into account. It is these decision-makers who act on behalf of the whole island community in determining planning applications and will do so on the basis of all the material considerations before them, which will include having regard to the views of the local community in the immediate vicinity or area of the application. The Minister does not, therefore, consider it to be right or appropriate to make a decision on any development proposal conditional upon evidence of support from the vicinity of an application site.

Part (c): The issues raised in this part of the amendment are essentially about openness, transparency and accessibility, and are already appropriately addressed by the provision of the proposal where it states that the guidance 'will include details of how the process remains open, transparent and accessible for all'. The voracity of evidence provided as part of a planning application is not a matter for Island Plan policy or guidance, and is an issue that can be scrutinised and assessed through the existing planning application process.

The planning inspectors, in their [report \(p.72\)](#), agree with the Minister's states concerns and conclude that this amendment presents an unnecessarily detailed approach that is not appropriate for inclusion in the Bridging Island Plan.

Island Plan 2022-25: Approval – fifty-ninth amendment – amendment

[\(Link to return to table\)](#)

THIS AMENDMENT TO THE AMENDMENT HAS BEEN WITHDRAWN

Island Plan 2022-25: Approval – sixtieth amendment – Performance Measures

[\(Link to return to table\)](#)

The Minister is minded to **REJECT** this amendment.

The Minister's comments in relation to this amendment are set out in [SR 65 - Performance framework](#). In summary, this amendment proposes the inclusion of several performance measures which will be impracticable, or impossible, to effectively measure and do not benefit the effectiveness of plan performance monitoring.

The planning inspectors, in their [report \(p.82\)](#), agree with the Minister's reasons not to accept this amendment and they do not believe these proposed measures will benefit the performance framework and do not recommend their adoption.

Island Plan 2022-25: Approval – sixtieth amendment – amendment

[\(Link to return to table\)](#)

The Minister is minded to **REJECT** this amendment to the amendment.

The Minister notes the proposed amendment to also include reference to develop the performance framework in consultation with the Statistics User Group (or any replacement Statistical Advisory Council) and the Economic Council (or any replacement independent body performing a similar advisory function), and further changes to the performance measures initially suggested.

The Place and Spatial Planning team have ready access to support and guidance from qualified statisticians to support the development of the performance measures, where this is appropriate and/or beneficial. Consultation with the Statistics User Group and Economic council is not considered necessary for this purpose.

The further changes proposed to performance measures do not escape, or improve, the matter that these measures are impracticable, or impossible, to effectively measure and they will not benefit the effectiveness of plan performance monitoring.

Island Plan 2022-25: Approval – sixty-first amendment – Glasshouses

[\(Link to return to table\)](#)

The Minister is minded to **REJECT** this amendment.

It cannot be supported because it is considered to be inappropriate; ill-defined; and potentially damaging in a number of respects.

1. The proposed amendment is **inappropriate** because it effectively serves to bypass the site assessment process that has been undertaken to identify and assess potential sites for the provision of affordable homes as part of the Island Plan Review.

This process included the assessment of a range of sites - some of which were glasshouse sites as is set out in the [Housing land availability and assessment of sites](#) report - where sites were assessed against set criteria; and relative to each other.

Existing land use was one consideration in addition to other relevant planning criteria – such as location, relative to existing built-up areas; landscape impact; and accessibility to local services. If sites – including glasshouse sites - were not selected through this process, it is because they did not perform well when assessed against all planning criteria; and that other sites are considered to be more appropriate for the provision of affordable homes.

This amendment effectively serves to bypass this rigorous process of assessment for sites that may have already been deemed to be not particularly appropriate for the provision of affordable homes.

The report accompanying the amendment states that there are no glasshouse sites in Policy H5: this is incorrect. Field S729 is a former glasshouse site (used as a garden centre); and field O785 is a former glasshouse site that is proposed to be added to the list of affordable housing sites.

2. The proposed amendment is **ill-defined**. Whilst the report acknowledges that many glasshouse sites are remote from services and facilities, and would not be appropriate for the development of homes, the proposed amendment of the policy does not provide any clear definition for the location of potential sites that might be supported.

The amendment suggests that the test for these sites might be where they are 'in close proximity to existing settlements and utility services.' Jersey is a small place and, without any clear definition of what is deemed to be 'close proximity' this proposed change to the policy is open to variable interpretation.

It is relevant to note that the reduction in the need for land under glass in the island was brought about by the demise of the tomato-growing industry in 2007-2008. Since that time, most of the former glasshouse sites that are well-located relative to the island's existing built-up areas have been developed for affordable homes. Examples include the former Hodge, Le Quesne and Samarès Nurseries; and the site of Hameau de la Mer, in St Clement; and de la Mare Nurseries in Grouville. Those glasshouse sites that remain are likely to present more difficult planning challenges.

The plan, at appendix 1, serves to demonstrate the location of land under glass throughout parts of the east of the island. It is not clear, from the drafting of this proposed amendment, whether some or all of these sites would be deemed to be 'in close proximity' to existing settlements, under the terms of this proposed amendment.

3. The implications of the proposed amendment are potentially damaging in a number of respects: in relation to the spatial strategy set out in the draft plan; the impact on the

character of the countryside; and the potential for unintended consequences for the agricultural industry.

The **spatial strategy** of the draft plan seeks to focus development activity within and around the island's existing built-up area. The Minister is of the view that this represents the most sustainable pattern of development for the island.

This amendment opens up the possibility of further residential development in the countryside, where new development may be more remote from access to local facilities and services. This has the potential to undermine the spatial strategy and the sustainability of the draft plan. This also has the potential to undermine the island's objectives for the promotion of sustainable means of travel and transport, such as walking and cycling; and objectives related to carbon neutrality.

Glasshouses are defined as temporary structures over agricultural land and they are generally located in the countryside. As a consequence, the release of land for the development of affordable homes is likely to have a **more significant impact on the character of the countryside**.

The site assessment process - undertaken for sites proposed to be allocated in the draft plan – has considered this potential impact and sites have been proposed for inclusion in the draft plan where it is considered that their landscape impact is considered to be manageable.

These concerns were also expressed by the independent planning inspectors when considering the matter of the use of redundant glasshouses sites and the spatial strategy of the plan at the examination. They said:

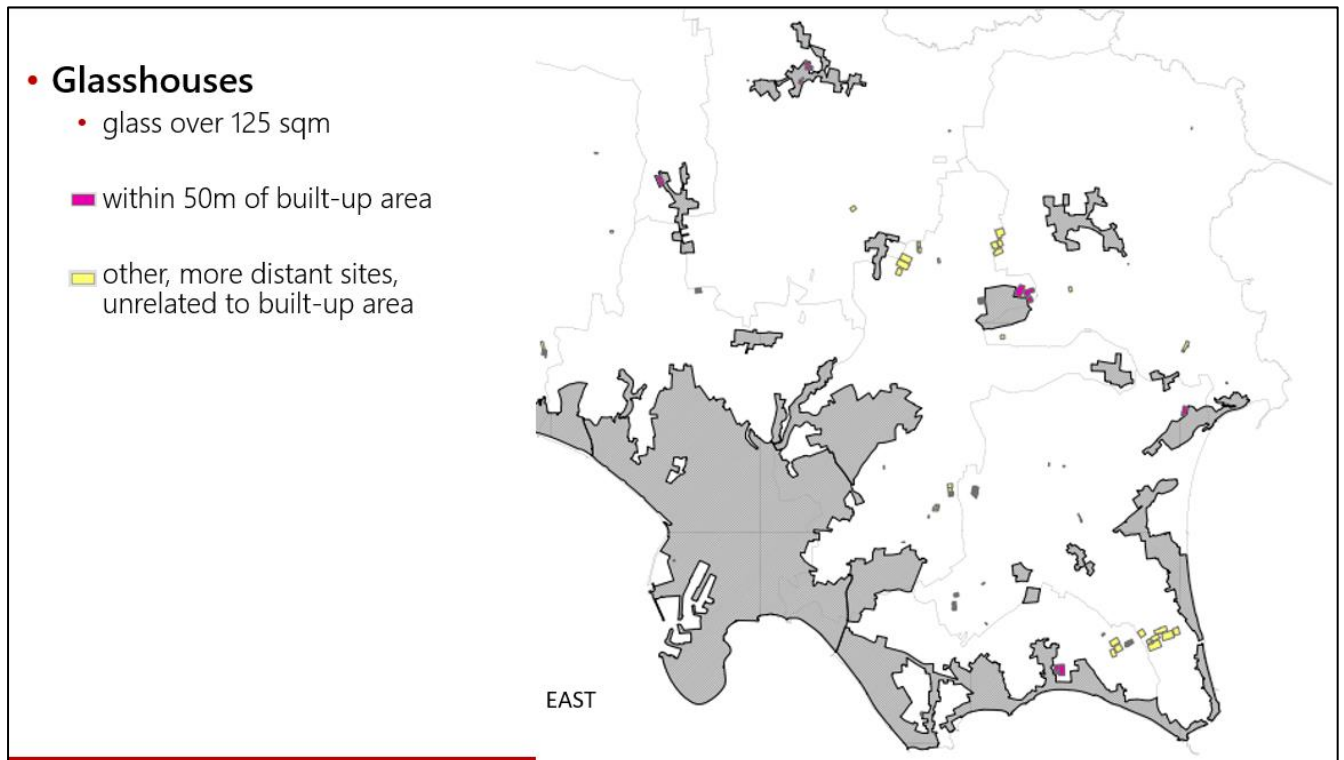
3.5 There are implications that flow from the DBIP approach particularly in relation to the use of redundant glasshouse sites. A number of those making representations argue that glasshouse sites should be seen as brown field land and used for residential development in preference to re-zoning green field sites for housing. It is claimed that there is no realistic chance of redundant glasshouse sites being returned to agricultural use. Whatever the merits of this argument, promoting the use of redundant glasshouse sites for housing throughout the island would have an adverse impact on the character of the open countryside and would to an extent undermine the sustainability credentials of the DBIP. The exception to this would be glasshouse sites that are in, or exceptionally closely related to, existing built-up areas.

The amendment may also have **unintended consequences for the agricultural industry** in terms of providing a more definitive, and potentially lucrative, exit strategy for existing glass; and may also encourage speculation in the development and/or release of glasshouses with the expectation that planning permission for residential development may be forthcoming under the terms of this amended policy, as proposed by the amendment.

In summary, therefore, this amendment is considered to present a number of serious planning challenges.

The amendment offers up the prospect of delivering community facilities as part of a development package for glasshouse sites. The Minister is firmly of the view, however, that the prospect of securing community facilities should not override key planning considerations and be used to justify proposals that may not otherwise be acceptable. The planning system already allows for planning obligations to be used to deliver realistic and proportionate community benefits where they are appropriate and justified relative to the nature and scale of development proposed.

Appendix 1: Glasshouse sites (over 125sqm) – east of island



Island Plan 2022-25: Approval – sixty-second amendment – Withdrawal of G392A, Grouville

[\(Link to return to table\)](#)

The Minister is minded to **REJECT** this amendment.

This field (G392A) is identified as one of the Minister for the Environment's preferred housing sites, as set out in Section 2.0 of the Minister's housing site position statement.

This site in Grouville is a clear preference of the Minister, above any other housing site proposed by other amendments in Grouville, as set out in Section 3.0 of the Minister's housing site position statement.

Comments in relation to earlier representations made in relation to this site are considered and responded to in [SR 26 - Policy H5 - Provision of affordable homes \(Appendix 1\)](#). It is noted here that the Jersey Farmers Union have identified this site as being 'less important to agriculture'.

The planning inspectors have also considered the inclusion of Field G392a as an affordable housing site in their [report \(p.30\)](#), where they conclude that the development of this land is at a sustainable location and they support the inclusion of the site in Policy H5.

Island Plan 2022-25: Approval – sixty-third amendment – Amendment to Policy SP1

[\(Link to return to table\)](#)

The Minister is minded to **ACCEPT** this amendment.

The Minister supports the objectives of this amendment, and whilst it is felt there is already sufficient wording in the draft Bridging Island Plan to support and encourage the use of renewable and recyclable materials, this amendment brings additional clarity and emphasis.

This amendment was lodged following the conclusion of the examination in public, and therefore, no specific comments have been made by the planning inspectors in their report.

Island Plan 2022-25: Approval – sixty-fourth amendment – Amendment to Policy C12

[\(Link to return to table\)](#)

The Minister is minded to **REJECT** this amendment.

The amendment incorrectly interprets that the draft Bridging Island Plan identifies the need for - and supports - the provision of new care homes in response to the ageing population and implementation of the Jersey Care Model.

The Care Model is clear that it seeks to move away from a culture of institutional care. A detailed explanation of residential and nursing care requirements is set out in [SR02 - Demand for residential and nursing care homes \(elderly persons\)](#), which sets out that there is, and has been, a level demand for residential and nursing care homes, despite an ageing population, and that this is a result of care moving away from institutions such as that proposed for MN688.

There may well be proven demand for this development in the future, but this can be tested without a specific designation under the auspices of Policy C12 as drafted, which allows development of healthcare facilities outside the built-up area, where a strategic need has been proven.

This site, being remote from local services, is considered to be wholly inappropriate for a nursing home, and its development would lead to significant landscape impact on this elevated site.

Whilst this amendment was lodged following the conclusion of the examination in public comments were made by the planning inspectors in respect of the potential development of this site for a nursing home, following the consideration of a representation submitted during the consultation. The inspectors conclude that it would not be appropriate to allocate a site for a care home or amend the wording of the policy, as set out in their [report \(p.56-59\)](#).

Island Plan 2022-25: Approval – sixty-fifth amendment – Amendment to Policy GD7

[\(Link to return to table\)](#)

The Minister is minded to **REJECT** this amendment.

Whilst, on the face of it, this amendment might appear to be making a minor change to a policy, its impact, in planning terms and on the Town of St Helier, could be significant and damaging.

The amendment is considered to be both inappropriate and unnecessary.

It is inappropriate because the Minister considers that it is right for buildings that are particularly tall, within the context of different parts of St Helier, to be justified by exception.

A considerable amount of work¹ has been undertaken to assess the capacity of different parts of the town to accommodate new development, including taller buildings; and guidance has been produced to help inform what height of buildings might be appropriate in different parts of the town. This will ensure that taller buildings are only accommodated in those parts of the town best able to accommodate them.

The proposed height guidance is set out at appendix 1. This directs buildings of up to eight storeys to the Waterfront. Buildings in excess of eight storeys here, or anywhere else in town should, it is proposed, be justified by exception, where the case for their exceptional height would be required to be clearly assessed and presented.

It is unnecessary because

- the draft plan already encourages redevelopment which, where appropriate, increases the development yield, whether of homes or floorspace, from the site; and it recognises that the potential to increase the height of buildings can help to play a role in this.
- the policy already allows for explicit consideration to be given to the public benefit that might be delivered by a tall building to be a factor in decision-making. The policy states that

*Development of a tall building of over eight storeys within Town will only be supported in exceptional circumstances and **where the overall benefit to the community will demonstrably outweigh any adverse impacts.***

- increasing the density and yield from development does not always need to rely on height. There are other ways of delivering the development that the island needs, as set out the Urban Character Appraisal:

‘...medium-rise developments can provide high-density housing while being much less likely to harm neighbouring buildings or the historic townscape than tall buildings. They are also more likely to deliver better amenity for residents and provide a human-scale environment. They can offer a sense of intimacy and family-friendly environments that tall buildings cannot.

*Consequently, the proposition here is that **St Helier can achieve very dense development without necessarily resorting to tall buildings.***

¹ [St Helier Urban Character Appraisal: review 2021](#)

Finally, Policy GD7: Tall buildings, as drafted, has been endorsed by the independent planning inspectors, following their thorough consideration of this issue at the examination ([see paras. 8.8 - 8.10 on page 71 of their report](#)). They state that:

‘On balance, we think the criteria in the policy are adequate to protect the built environment across the island and would not create a blanket carte blanche to develop high buildings as feared by some. The policy accords with the general strategy of the DBIP to concentrate development in the urban areas and make the best use of brownfield land. While mindful of some of the problems buildings higher than four to five storeys can create, we consider that the policy is reasonable and is recommended for adoption as drafted.’

Appendix 1: height guidance for St Helier

Character Area	Height guidance
CA1 Elizabeth Castle/First Tower	<ul style="list-style-type: none"> • Single storey above sea walls • Keep below building outlines as seen from shore
CA2 La Collette	<ul style="list-style-type: none"> • Single storey, allowance for incidental plant and machinery up to 2 storeys
CA3 Havre des Pas	<ul style="list-style-type: none"> • West of Howard Davis Park, between 2 to 3.5 storeys or eaves no more than 1m above or below neighbour • East of Howard Davis Park, up to 4.5 or 5 storeys where the context permits • The redevelopment of existing 15 storey buildings permitted at Le Marais
CA4 Fort Regent	<ul style="list-style-type: none"> • Between two to four storeys on the west flank • Up to three storeys on the east flank • Silhouette not to project above line of natural landform or the historic fort structure when seen from harbour
CA5 Old Harbours	<ul style="list-style-type: none"> • Up to three storeys • The redevelopment of existing 6 storey buildings permitted on the west side of the marina
CA6 New Waterfront	<ul style="list-style-type: none"> • Up to 8 storeys
CA7 The Parade/People’s Park	<ul style="list-style-type: none"> • Up to 3.5 storeys
CA8 Town Centre Core	<ul style="list-style-type: none"> • Up to 4.5 storeys (unless specified in a separate design brief)
CA9 Town Centre North	<ul style="list-style-type: none"> • Up to 4.5 storeys (unless specified in a separate design brief) • Up to 5 storeys as accents, at corners or other landmark locations
CA10 Town edges/slopes	<ul style="list-style-type: none"> • Up to 6 storeys (unless specified in a separate design brief) • Building heights not permitted to be taller than 15m or 3 storeys on the ridgeline

Table GD1: Building height guidance for Town (St Helier Urban Character Appraisal)

**Island Plan 2022-25: Approval – sixty-sixth amendment – Use of fields G403C, G403D
and part of G432A, Grouville**

[\(Link to return to table\)](#)

THIS AMENDMENT HAS BEEN WITHDRAWN

The Minister was minded to **REJECT** this amendment.

Island Plan 2022-25: Approval – sixty-seventh amendment – Use of fields G508, G508A, G526, G526A G521A, Grouville

[\(Link to return to table\)](#)

The Minister is minded to **REJECT** this amendment.

The Minister's position is set out in section 3.0 of the Minister's housing site position statement, where it is highlighted that the Minister does not support this site for affordable homes, and **does not support it as a potential alternative**, should insufficient homes be allocated from the Minister's own list of sites.

This is a very large site that is somewhat remote from local facilities. It comprises two blocks of agricultural land both of which have A and B conditions applied. The Land Controls team of IHE have commented that they have a very good shape and access and are good agricultural land which would be of a significant loss to the industry.

The site is identified as having a medium flood risk under Policy WER2 – Managing flood risk. Residential development in medium flood risk areas should only happen if exceptionally justified (which in this case, it is not).

In terms of landscape impact, the site has a medium-low sensitivity score from the landscape sensitivity analysis.

There is potential direct vehicular access onto the primary road network (La Rue de Fauvic), with good public transport links but lacks pedestrian connection through to La Grande Route des Sablons and improvement of the eastern cycle route and footway provision would be required.

Island Plan 2022-25: Approval – sixty-eighth amendment – Use of Field T1404, Trinity

[\(Link to return to table\)](#)

The Minister is minded to **REJECT** this amendment.

The Minister's position is set out in section 3.0 of the Minister's housing site position statement, where it is highlighted that whilst the minister does not support the allocation of this site, it **could be considered as a potential alternative** should there be insufficient homes allocated from the Minister's own list of preferred housing sites.

This site scored reasonably well when compared to other sites and can be integrated into Sion village, subsequently performing well against spatial and suitability scoring.

The field is subject to agricultural land conditions A and B. It is considered to be of a good quality, shape and size and would be of significant loss to the agricultural industry.

The site could be accessed to the south of Fairway and north of the new supermarket and supplementary information was provided during the examination in public. It would be necessary to ensure that sightlines at the access could be achieved and maintained.

There is a poor bus services in the area, which would need to be improved, and pedestrian permeability could be achieved through the site with new pedestrian access created onto La Grande Route de St Jean.

Surface drainage could potentially be dealt with via on site soakaways but the area has a high water table so further capacity checks are required. The existing public foul sewage system should have sufficient capacity for additional use.

The planning inspectors considered this site during the examination in public and did not identify it as a potential housing site. It was, however, noted during hearings that this site performed relatively well.

Island Plan 2022-25: Approval – sixty-ninth amendment – Use of Fields P655 and P656, St. Peter

[\(Link to return to table\)](#)

The Minister is minded to **REJECT** this amendment.

The Minister's position is set out in section 3.0 of the Minister's housing site position statement, where it is highlighted that whilst the Minister does not support the allocation of this site, it **could be considered as a potential alternative** should there be insufficient homes allocated from the Minister's own list of preferred housing sites. In such event, the overall impact upon the St Peter's Village area would need to be considered, given the number of housing sites proposed in area and the cumulative impact this could have.

In summary, based upon the initial suitability analysis, the site scored well when compared to other sites. The ILSCA appraisal gave a landscape score as medium and recommended supplementary tree planting on eastern boundary, which would minimise the impact on landscape character.

The site relates well to the village centre and many facilities are accessible by foot. Vehicular access would be required, and appears to be achievable, from the southern part of the site, directly on to La Route de Beaumont. Planning obligation agreement contributions would be required for roadside safety improvements on La Route de Beaumont and connectivity to the east of the site for cyclists and pedestrians.

There is no spare capacity in the local drainage system and, therefore, improvements to drainage infrastructure and capacity would be required.

The site is, however, considered to be good agricultural land attached to large block of farmed land. Due the good quality size and proximity of the dairy unit this land would be classed as highly strategically important.

This site was identified as a potential suitable alternative should overall housing supply targets not be met by the preferred housing sites, as also endorsed by the planning inspectors in their [report \(p.42\)](#).

Island Plan 2022-25: Approval – seventieth amendment – Use of Fields G234 and adjacent land, Grouville

[\(Link to return to table\)](#)

The Minister is minded to **REJECT** this amendment.

The Minister's position is set out in section 3.0 of the Minister's housing site position statement, where it is highlighted that whilst the Minister does not support the allocation of this site, it **could be considered as a potential alternative** should there be insufficient homes allocated from the Minister's own list of preferred housing sites. In such event, the overall impact upon this part of Grouville would need to be considered, given the number of housing sites proposed in area and the cumulative impact this could have.

The site scored reasonably well when compared to other sites. Whilst adjacent to the existing affordable housing site of Jardin de la Mare, it extends beyond the envelope of the existing built-up area and any development would encroach into the open, rural landscape.

The site is adjacent to Grouville Marsh which lies to the north and which is designated an ecological SSI and so any development may have potential implications for biodiversity. The amendment has proposed to mitigate this impact through the provision of a 15m deep environmental buffer along the north-western boundary of the site, bordering the marsh. This would need to be fully considered and secured should development on this site take place. A buffer zone of 15m is very likely to be insufficient and thus a larger buffer would be required to ameliorate this potential impact.

There are options as to how vehicular access might be achieved for this site, through Jardin de la Mare development or Paddock End rather than creating an additional access onto La Rue a Don. Some pedestrian improvements would be required,

It is particularly noted that field G234 comprises a field in agricultural use and adjacent land which is covered by a polytunnel, and would represent a significant loss to agriculture if lost.

This amendment was lodged after the examination in public and therefore, detailed comments from the planning inspectors are not available. They did however note the site in response to a representation, in table 2 of their [report \(p.98\)](#), identifying the key issues as pertaining to spatial integration and the aspiration for open market homes (though it is noted that the amendment which followed the EiP does not request a proportion of open market homes and is therefore not relevant).

Island Plan 2022-25: Approval – seventy-first amendment – Use of Fields G355, Grouville

[\(Link to return to table\)](#)

The Minister is minded to **REJECT** this amendment.

The Minister's position is set out in section 3.0 of the Minister's housing site position statement, where it is highlighted that the Minister does not support this site for affordable homes, and **does not support it as a potential alternative**, should insufficient homes be allocated from the Minister's own list of sites.

This field is considered to form part of the group of the fields that comprise the 'Grouville - Built Edge Fields': where this area is considered to be of medium-low sensitivity to housing development.

Given the shape and orientation of this field, as a narrow strip of land adjacent to existing residential development, it may cause an overbearing impact to the existing properties along La Rue de la Pasture.

Access to the site could be via La Sente des Fonds to the south; Le Grande Pre / Rue Maraval to the north; or from Les Clos des Fonds to the east. All are narrow parish by-roads or private roads and less suitable for accommodating any significant increase in traffic.

There may be potential for full pedestrian and cyclist permeability at both northern and southern ends of the site, including potential for pedestrian permeability through existing residential developments to improve links with Grouville Primary School and nearby shops. A contribution to the eastern cycle network would be required and there exists good public transport links nearby. Improvement of ECN and footways in the vicinity may be required

The site is in agricultural use and subject to agricultural conditions A and B, being of good shape and good access. As such, it would be regarded a significant loss with adverse impact on surrounding farmed area.

It is noted that the northern part of the site is identified as having a low flood risk as identified in draft Policy WER2 – Managing flood risk, which whilst this does not preclude development, it would require mitigation.

This amendment was lodged after the examination in public and, therefore, detailed comments from the planning inspectors are not available. They did however note the site in response to a representation, in table 2 of their [report \(p.98\)](#), identifying the key issues as overbearing impact and that the footway benefit would be insufficient.

Island Plan 2022-25: Approval – seventy-second amendment – Use of Fields G538A, Grouville

[\(Link to return to table\)](#)

The Minister is minded to **REJECT** this amendment.

The Minister's position is set out in section 3.0 of the Minister's housing site position statement, where it is highlighted that the Minister does not support this site for affordable homes, and **does not support it as a potential alternative**, should insufficient homes be allocated from the Minister's own list of sites.

This field is considered to form part of the group of the fields that comprise the 'Grouville - Built Edge Fields': where this area is considered to be of medium-low sensitivity to housing development.

This is considered to be good agricultural land attached to large blocks of farmland and would, therefore, be regarded a significant loss to agriculture if developed.

Access to the site would be via La Sente des Fonds which is a narrow parish by-road and less suitable for accommodating any significant increase in traffic. However, given proximity to G392A, should it be possible to achieve integration with that site, field G358A has greater potential for development. It is, however, noted that an existing residential unit and curtilage presently separate the two sites.

This amendment was lodged after the examination in public and, therefore, detailed comments from the planning inspectors are not available. They did however note the site in response to a representation, in table 2 of their [report \(p.98\)](#), identifying the key issues as overbearing impact and that the footway benefit would be insufficient.

Island Plan 2022-25: Approval – seventy-third amendment – Use of Field MN727, St. Martin

[\(Link to return to table\)](#)

The Minister is minded to **REJECT** this amendment.

The Minister set out his initial response to this proposal in his statement response [SR 12 - Policy CI5 - Field MN727 - Proposed sports and leisure site](#) as part of his post-consultation report. The primary reason for the Minister's initial objection to this proposal was because of the unsustainable location of the proposed development and the significant harm that such a facility would have on the character and nature of what is a rural area, including the loss of agricultural land.

It is noted that the inspectors, contrary to the Minister's recommendation, recommended that this site should be allocated for the development as an indoor cricket training facility with supporting health, fitness and wellbeing activities. This is set out in their [report \(p.61\)](#) and was subject to discussion at the examination in public hearings, with representation from the Farmers' Cricket Club.

The inspectors have provided two key reasons as the basis for their own recommendation to designate this site for sports-related development, which they consider to outweigh the Minister's objection against it:

1. they consider the site to be in a logical place for such a facility, being adjacent to the existing cricket ground, which provides an excellent facility for cricket in the island. The proposal is supported by the International Cricket Council and the ground has provided a venue for international teams to compete against the Jersey team.
2. during the hearing, they were told that alternative arrangements for existing indoor sporting facilities at Fort Regent are being sought as Fort Regent is not ideal for indoor sports.

The Minister does not, however, consider that these are sufficient reasons to overcome his concerns, and contends that:

1. whilst the development may be logically placed relative to the existing cricket ground, it is not logically or sustainably placed relative to the spatial strategy of the draft plan and would lead to a significant sports facility being placed in the open countryside – thus leading to landscape harm and unsustainable travel patterns.
2. the development of this site is not directly related to the decant of sport activity from Fort Regent and the direct link is not accepted.

Proposed Policy CI5 – Sports, leisure and cultural facilities is clear that the Minister wishes to focus new large-scale sports and leisure facilities within the island's primary and secondary urban centres, or within the sites designated as sports and leisure enhancement areas. Not only is the site not within, or near, the island's primary or secondary urban centres, it would also go significantly beyond the sites already identified as sports and leisure enhancement areas in the draft Plan, where each site proposed for designation is either within the built-up area, or immediately adjacent to it with the land already in sports and leisure use.

Whilst the Minister seeks to ensure that the draft Bridging Island Plan is able to accommodate all sports facilities to the benefit of islanders, this is not considered to be the right location for a sports and leisure facility. It is acknowledged that there are existing cricket

facilities to the east of field MN727, but this alone cannot be the justification to significantly intensify a sports and leisure use in a rural location, where such a rural location is not justified for the type of activity intended on the site.

In addition, the Minister appreciates the highlighted need for new sports facilities in the east of the Island, as identified in the active places strategy. Provision for this in Policy CI5 through the inclusion of land at Le Rocquier School for sports and leisure enhancement.

Island Plan 2022-25: Approval – seventy-fourth amendment – Replacement of Policy HE1

[\(Link to return to table\)](#)

The Minister is minded to **REJECT** this amendment.

The premise of this amendment is that the policy in the draft plan reduces the protection for listed buildings and places. The Minister's view is that it does not, and in fact, provides a better, more robust policy that is better able to deal with proposals which affect listed buildings and places.

Whilst the Minister considers the revised draft policy HE1 to be robust and fit-for-purpose, it could be further strengthened, to ensure that decision-makers are better equipped to deal with planning applications which may adversely impact upon the island's historic environment. In particular, the Minister is concerned to ensure that a policy that is designed to manage change in the historic environment in a sustainable way is not abused and used to justify schemes where their overriding public benefit is not clearly described and demonstrated, but which might otherwise harm the island's heritage.

To achieve this, the Minister is proposing further amendment to Policy HE1 and its accompanying preamble to strengthen the need to demonstrate public benefit of potentially harmful change ([see P.36/2021 Amd 89 amd. 2](#)).

The reasons why the Minister is seeking to reject this amendment are set out below, in relation to the points raised in Deputy Labey's amendment.

The current policy works well

- **it does not.** The policy has been unable to resist the continued and complete loss of listed buildings during the plan period.
 - since 2012, 17 listed buildings have been demolished entirely, or with some façade retention including, La Collette Flats (low-rise); 33-35 Ann Street (for affordable housing schemes); 28-30 Cannon Street (for open market housing and mixed use); 14-16 Hilgrove Street; 92 Bath Street and buildings in Dumaresq Street (for retail, residential and visitor accommodation schemes); Southampton Hotel, except the façade, (for residential and commercial use) and 38 Commercial Street, 8 – 9 Esplanade and 27 Esplanade, except for façade and three bays for (new offices).
- change in the historic environment is inevitable, caused by natural processes, the wear and tear of use, and people's responses to social, economic and technological change. Very few heritage assets can be maintained at either public or private expense unless they are capable of beneficial use. It would not be desirable, even if it were practical, for most places that people value to become solely memorials of the past. Keeping listed buildings and places in use is likely to require continual adaptation and change.
- the aim of the revised policy is to ensure that change to historic buildings respects their values to ensure they have wider benefit public (heritage) as well as private interests. It is framed in a way that enables change to a listed building or place and its setting to be managed in a way that will best sustain its heritage values, while recognising opportunities to reveal or reinforce those values for present and future generations.

- the current 2011 policy is unable to do this in a way that is proportionate, clear or consistent as it lacks a clear framework against which proposals, which might harm the significance of the historic environment, can be appropriately considered and tested.

The 'presumption in favour of preservation' is lost

- **it is not.** The principle of protecting the heritage value of Jersey's listed buildings and places is a fundamental one. As a consequence, the 'presumption in favour of preservation' is not lost from the proposed draft policy, it is simply expressed differently in the proposed draft plan and actually strengthened.
- the first line of the policy, as set out below, imposes an **obligation** for development to protect the special interest of heritage assets. This is through the use of the word '**must**':

*Proposals that could affect a listed building, or place, or its setting, **must** protect its special interest.*

- The **use of the word must is stronger than a presumption.** The OED definition is as follows

A use of 'must' (must v.1) to express a command, obligation, or necessity; (hence) an obligation, a duty; a compulsion.

New tests in the proposed draft policy weaken it

- **they do not.** The assertion that the draft policy 'could make it easier developers' to argue that there is no other way of delivering their proposals (other than a way which results in harm to the historic environment) is **not correct**.
- the reason why is that the tests that have been added to the policy are linked and sequential; and do not stand alone (apart from that at d. currently).

Proposals that do not protect a listed building or place, or its setting, will not be supported unless, and with regard to the comparative significance of the listed building or place, or its setting, and the impact of proposed development on that significance:

- a) the changes are demonstrably necessary either to meet an overriding public policy objective or need; **and***
 - b) there is no reasonably practicable alternative means of delivering those proposals without harm to the heritage values of the listed building or place, or their settings; **and***
 - c) that harm has been avoided, mitigated and reduced as far as reasonably practicable; or*
 - d) it has been demonstrated that the predicted public benefit outweighs the harm to the special interest of the building or place in its setting.*
- the concern expressed that a developer could argue that there is no other practicable way of delivering their proposal without harm to a listed building under the terms of the policy is **unfounded**.
 - the tests set a high bar: any proposal would need to **demonstrate** that the changes are needed to meet an overriding public policy objective; **and** that harm to the historic environment has been avoided, mitigated and reduced as far as reasonably

practicable; **and** satisfying the test that there is no reasonable alternative way of undertaking the development without harm to the historic environment.

- decisions about change must be reasonable, transparent and consistent, and these tests have been introduced to provide a clear and transparent framework against which decision-making can be made.
- the current HE1 policy does not do this.
 - under the current HE1, where proposals conflict with the absolute provisions of it, they have to be dealt with as a departure from the Island Plan and can be approved provided there is sufficient justification to do so (at Article 19(3)).
 - current HE1 policy encourages an unstructured and inconsistent approach to setting out the balance between the potential wider benefits of planned development and impacts on heritage.
- with the proposed tests of the new policy, any such impacts will need to be fully justified and evidenced in the application ensuring there is transparency, robustness and consistency in decision-making. This will allow decision-makers to have a clearer basis on which to make decisions which balance impact on heritage with potential wider public benefit.

The proposed draft policy is behind the times

- the report suggests that Jersey is behind the times, is not in step, and that the policy fails to ensure that heritage is used positively and as an attribute to development.
- **it is not.** the policy explicitly recognises that change in the historic environment is inevitable and necessary to sustain it but needs to be managed in a way that ensures and sustains the significance and essential value of listed buildings, places and their settings. Unlike the current policy – which is out of step - the draft proposed policy enables this to be done in a more structured and transparent way.
- the principles which underpin this policy also align with those **promoted and codified by other jurisdictions** and are **consistent with best practice**.

Policy and its use

The robustness and utility of a policy is dependent upon its appropriate use and application, where the underlying considerations should always be proportionality and reasonableness.

The Minister and the Assembly, through the Island Plan, provide the tools to give effect to the objectives of protecting the historic environment and the weight afforded to their use. The emphasis rests with those who determine planning applications that affect the historic environment.

It is believed that the provisions of the draft policy would better equip decision-makers to test whether any scheme supports the delivery of public policy objectives and whether its public benefit outweighs harm to the historic environment. It would also consistently require developers to demonstrate that alternatives have been appropriately examined; and that mitigation of harm has been optimised.

It is considered that the current policy framework does not properly enable these considerations. It is apposite to consider had it done so could those historic buildings lost to development under during the current plan period have been retained?

Island Plan 2022-25: Approval – seventy-fifth amendment – Residential Delivery and Management Strategy

[\(Link to return to table\)](#)

The Minister is minded to **ACCEPT** this amendment.

It is understood that the Minister for Housing and Communities is already considering how the development of new homes can be expedited, including the use of pre-fabricated methods of construction, as part of work to consider the role and barriers to the use of Modern Methods of Construction in housing delivery in Jersey.

Island Plan 2022-25: Approval – seventy-sixth amendment – Visitor Parking

[\(Link to return to table\)](#)

The Minister is minded to **REJECT** this amendment.

The Minister acknowledges that new development needs to make provision for the parking that is necessary to service that development, whether occupants or the provider of services, including care services.

The proposed amendment – which seeks to introduce a specific policy and a proposal focused just on visitor parking – is, however, considered to be both **unnecessary** and **inappropriate**.

The proposed policy, as drafted, is also unclear and does not appear to wholly achieve its intentions.

A specific policy for visitor parking is **unnecessary** because:

- it does not require a specific policy of its own
- the matter is already addressed in the draft plan.
- the need to provide parking as part of a development proposal – to serve all users of a site, which includes all visitors – is already addressed by Policy TT4 (see extract below: emphasis added).

Policy TT4: Provision of off-street parking

*Development that has the potential to generate vehicular movements and a requirement for car and other forms of parking **will be supported only where it provides an appropriate level** of accessible, secure and convenient off-street car parking, that is well-integrated with the development, and which accords with adopted parking standards in terms of number, type, quality, security and accessibility, **to meet all users' needs**, with priority given to parking for people with mobility impairments.*

A specific proposal for the production of visitor parking guidelines is **unnecessary** because

- it does not require a specific proposal of its own
- there is already a proposal that sets out to do this, which include setting standards for all types of parking requirements, including those of visitors.

Proposal – Sustainable transport zones

The Minister for the Environment will develop and publish supplementary planning guidance (SPG) for sustainable transport zones (STZ) to:

- ***establish standards for the provision of motorised and non-motorised vehicle parking:***
 - *for various forms of development, including residential; and / or*
 - *for the zone, or any part of the zone*

The amendment is also inappropriate, because:

- it seeks to highlight the issue of visitor parking above all others. It is necessary and appropriate for all types of parking to be catered for as an integral part of the design of a development scheme.

- it is not for the development plan to differentiate between different types of parking requirements. This is best determined and set out in supplementary planning guidance which, as members of the Planning Committee, both the Deputy and many Connétables who sit on the Planning Committee will be aware.
- efforts to secure better provision for visitor parking are best directed through engagement with the development of the supplementary planning guidance for new parking standards, not the Island Plan. Draft standards are in an advanced stage of preparation and will be the subject of consultation following approval of the draft plan.

Finally, parts of the wording of the amendment are unclear, and do not appear to wholly deliver the intent behind it.

- it states '*Development proposals that have the potential to generate vehicular movements and a requirement for car and other forms of parking will be supported only where consideration has been given to the use of a site for the provision of services and care.*'.
- it would appear, however, that intent of the amendment is not focused on 'the use of the site', but rather on 'the provision of parking to support the use of the site'. To better reflect this intent, the amendment might have said '*Development proposals that have the potential to generate vehicular movements and a requirement for car and other forms of parking will be supported only where consideration has been given to ~~the use of a site for the provision~~ **of parking for** services and care.*'

Island Plan 2022-25: Approval – seventy-seventh amendment – Use of Fields B26 and B27 in St. Brelade for Vehicle Inspection Centre

[\(Link to return to table\)](#)

THIS AMENDMENT HAS BEEN WITHDRAWN

Island Plan 2022-25: Approval – seventy-seventh amendment – amendment

THIS AMENDMENT TO THE AMENDMENT HAS BEEN WITHDRAWN

[\(Link to return to table\)](#)

Island Plan 2022-25: Approval – seventy-eighth amendment – Rezone Field H1219A for accessible homes

[\(Link to return to table\)](#)

The Minister is minded to **REJECT** this amendment.

This site is considered to be appropriate as an affordable housing site and is proposed by the Minister for the Environment as such. This amendment seeks to transfer the allocation of the site to persons with a disability only.

The Minister agrees with the premise that underpins this amendment, in that the housing needs of persons with disabilities needs to be better understood, and prioritised where needs arise.

The amendment raises interesting points regarding the sustainability of this site, and that there may be some care and community benefit to co-locate persons with disabilities. Equally, however, it is important also that persons with disabilities are able to live comfortably within the wider community, and to avoid any premise towards institutionalisation or community segregation. Clearly, these are contrasting points and the benefits and drawbacks of such a model remains wholly untested. The housing needs of disabled persons in the community must be identified and addressed in consultation with those persons and their care providers, and not unilaterally determined by a States' decision.

The Minister considers the affordable homes policy to have sufficient flexibility to include delivery of a proportion of homes for disabled persons, allocated through the affordable housing gateway. It should also be noted that changes to the island's building byelaws in 2007 have meant that all new homes constructed since that time enable occupants with disabilities to cope better with reduced mobility and, therefore, all new homes built in Jersey should be more compatible with disabled living.

As the amendment highlights, there is insufficient data to know how many homes would be required for this purpose, but this can be further considered in supplementary planning guidance relative to gateway waiting lists. This flexible approach is considered to be preferable to the formal designation of an entire affordable housing site for a specific category of occupant, which may not be representative of need both in terms of number and location.

The objective assessment of housing need suggests that the need for supported housing should be considered in addition to the OAHN figure. As such, Policy H6 Supported housing supports the delivery of supported homes in built-up areas and resists the loss of existing supported living homes.

The for the reasons above, the Minister considers there to be insufficient justification for this amendment, with a lack of evidence that the development of this site for this purpose will truly meet the needs of disabled islanders. It is, however, accepted that more needs to be done to understand the housing needs of disabled islanders, and the Minister will endeavour to work with the Minister for Housing and Communities to improve this in the development of supplementary planning guidance for all designated affordable housing sites; and also in future assessments of housing need in the island.

Island Plan 2022-25: Approval – seventy-ninth amendment – Amendment to Policy CI3

[\(Link to return to table\)](#)

The Minister is minded to **ACCEPT** this amendment.

Whilst the Minister is minded to accept the amendment, it should be emphasised that these changes to Policy CI3 are not necessary, as the issues are already adequately addressed in other policies of the plan, which the hospital planning application will be tested against.

Part (a) of the amendment is already directly dealt with by the provisions of Policy TT1 - integrated safe and inclusive travel.

Part (b) of the amendment asks for compliance with Policy GD1 Managing the health and wellbeing impact of new development, which is not required as the development of the hospital will already be considered against this policy.

Island Plan 2022-25: Approval – eightieth amendment – Use of Villa De L’Aube & Field P818, St. Peter

[\(Link to return to table\)](#)

The Minister is minded to **REJECT** this amendment.

The Minister’s position is set out in section 3.0 of the Minister’s housing site position statement, where it is highlighted that the Minister does not support this site for affordable homes, and **does not support it as a potential alternative**, should insufficient homes be allocated from the Minister’s own list of sites.

This site performs very poorly when compared to other sites, particularly as it is remote from local facilities and does not relate well to the proposed local centre of St Peter’s Village. The development of this site would represent a significant intensification and urbanisation of the countryside, and lead to adverse impact on local landscape character.

The Transportation section of IHE have commented that the site location is poor in terms of sustainable travel - additional vehicle trips through Beaumont filter-in-turn. Vehicular access to the site from Le Vieux Beaumont but would also need to consider additional vehicle movements through both north and south junctions of Le Vieux Beaumont with La Route de Beaumont. Poor pedestrian facilities on Le Vieux Beaumont. If the site were to be development, cycling infrastructure would need to be improved to link with well-established cycle routes in the west.

IHE also raise concerns around the condition of the retaining structure on the southern boundary of the site and the potential impact upon the safe and free flow of traffic in the event that the stability of the wall deteriorates. However, these comments are not specifically related to the potential of the site to accommodate new housing development.

Infrastructure improvements to drainage capacity would be required.

The Land Controls team of IHE have commented that the site has permissions for equine-related use and is of no significant agricultural value.

The planning inspectors considered this site following a representation submitted in the earlier stages of the development of the draft plan. The inspectors do not support the inclusion of this site for affordable homes, and whilst no detailed comment is provided, they have identified the site and its main reason for not being supported as being spatial, which is consistent with the Minister’s views set out above. ([See inspectors report, Table 2 \(p.96\)](#)).

Island Plan 2022-25: Approval – eighty-first amendment – Changes to Passivhaus Policy

[\(Link to return to table\)](#)

The Minister is minded to **ACCEPT** this amendment.

The Minister has given very careful consideration to this amendment, which would delete an ambitious - yet very promising - policy of the draft Bridging Island Plan to deliver significant improvements to the quality and thermal performance of affordable homes, and development in less sustainable locations in the countryside.

The inclusion of this policy attracted very polarised views in both the consultation and the examination in public. A number of representations were concerned about the high-bar it would set for such development, how it might slow the delivery of homes and also the potential cost implications of delivery, whilst a number of others celebrated its inclusion highlighting the proven quality and excellence of the standard and that cost impacts can be minimal.

The inspectors opposed the views that the inclusion of the Passivhaus requirement would have negative impact on development, highlighting the proposed policy is very flexible and allows for concessions to be made based on both viability and other practical considerations. They also agreed with the Minister that there is a need for action now to reduce carbon emissions arising from new development, in pursuance of the ambition to become carbon neutral. They highlighted that Jersey could learn from the considerable experience of others and taking into account the very flexible terms of the policy, they do not accept that Policy ME2 should not be applied now. Conversely, they suggested that the application of the policy should be expanded to include open market development in built-up areas – meaning the policy would apply to the development of *all* new homes. ([See inspectors report \(p.26 and 80-81\)](#)). The Minister, [in his post examination response \(p.36\)](#), did not accept this recommendation as he must also have regard to the wider challenges and demands which may arise as a result of a sudden and significant change for all new homes and large-scale development proposals to meet new environmental construction and performance standards, which would represent a high proportion of all new planning applications.

As also recommended by the Inspectors, the Minister has taken action to amend Policy ME1 – 20% reduction in target energy rate (see [Amendment 93](#)). The effect of this broadened policy scope effectively represents an interim uplift in the energy performance requirements of the building bye-laws, affecting a significant number of new developments, but to which it is considered the development industry will be able to respond. No significant concern achieving a 20% target energy rate reduction was raised during the consultation.

Accepting the change to Policy ME1 would be a significant step forward for Jersey in taking serious steps to reduce carbon emissions from new development, and in particular, will act as a kick-start to the changes which are required to the building bye-laws, both as in the commitments of the Bridging Island Plan, and also the Carbon Neutral Roadmap.

In testing the effect of achieving a 20% reduction in target energy rate for new buildings, it is clear that this change will also narrow the gap between current building performance requirements, and that which would have been expected in the flexible application of the Passivhaus policy, and also, that this gap will be further closed by the review of the building bye-laws. Because of this, the justification for retaining the Passivhaus policy has become

smaller, and when considered in relative the work both Government and the industry will need to do to implement Passivhaus, and the addition layer of regulatory assessment it would require, the balance of benefits are no longer as they once were. The Minister is therefore satisfied that the policy can be withdrawn, on the basis that the same or similar ends are expected to be achieved in an ambitious review of the building bye-laws.

The Minister has always been clear that undertaking a proper review of the building bye-laws is the right way to achieve a permanent reduction in building energy consumption, and he is very committed to achieve this as a priority following the adoption of the Bridging Island Plan and Carbon Neutral Roadmap. This review will be subject to industry consultation prior to change being adopted.

Island Plan 2022-25: Approval – eighty-second amendment – Policy GD5

[\(Link to return to table\)](#)

The Minister is minded to **REJECT** this amendment.

The Minister's detailed response to all earlier representations made in relation to Policy GD5 are set out in [SR 44 - Policy GD5 – Demolition](#).

To reach the objective of becoming carbon neutral and achieve the global benefits of doing so, it is essential that everyone, not just the development industry, becomes more aware of the impact that our daily life and business activities have on carbon emissions and climate change. Thus, the Minister maintains that this policy must exist to promote a culture of re-use of buildings rather than demolition and rebuilding.

The policy as drafted allows for the environmental and sustainability benefits to be considered in allowing a demolition. Environmental considerations include the impact that retaining or demolishing a building would have upon the landscape and will thus consider design quality – or *aesthetic benefit* - in that. The consideration of aesthetic benefit as a test of its own, however, entirely undermines the intent of the policy, and will essentially grant a free-pass for unsustainable development practices to continue, and not give the industry the nudge it needs to be more creative in making use of existing building fabric in high quality design proposals.

In relation to *practical* benefits of demolition, this is already clearly embedded within the policy as-drafted, particularly the first test is to consider whether or not demolition is appropriate in sustainability terms, and/or whether it is economically viable to repair or refurbish it. In most cases, retention of the existing building will become economically unviable before it truly becomes practically unviable. The wording proposed by the amendment will no doubt create a degree of subjectivity as to whether retaining all or part of a building is 'practical' from an individual's perspective, and such wording could therefore leave the policy so weak and open to interpretation, that it has no leverage at all to ensure any building fabric is retained, and thus also undermines the intent of the policy.

The States have declared a climate emergency, and we are due to embark on a debate to agree the Island's Carbon Neutral Roadmap. Agreeing Amendment 82 would be a significant retrograde step for Jersey in taking necessary steps to reduce carbon emissions arising from new development. It should not be supported.

Island Plan 2022-25: Approval – eighty-third amendment – Quarrying and Air Quality Amendment to Policy MW1

[\(Link to return to table\)](#)

The Minister is minded to **REJECT** this amendment.

The basic premise of this amendment is that the blasting and crushing of rock within quarries produces dust and particulate matter that can ‘*seriously harm health, adversely affect ecosystems and cause damage to amenities*’ and that, as a consequence, buffer zones of up to 250m should be instigated around proposed extension to minerals extraction sites; in addition to regular monitoring.

The report readily acknowledges that there is no data about air quality around the island’s quarry sites; and there is no evidence of harm.

The Minister is of the view that the amendment is both **unnecessary** and **inappropriate**.

1. It is **unnecessary** because the potential impact of extended quarrying activity on air quality is not a matter to be addressed in the Island Plan – which simply seeks to safeguard land for extended minerals extraction, both at Field MY966 (adjacent to La Gigoulande Quarry); and at Simon Sand. **It is a matter to be addressed at the planning application stage.**

The Island Plan proposal does not confer planning permission for these activities on these sites and planning permission would need to be sought in the normal way, outside of the Island Plan review process, for any mineral extraction to take place on a safeguarded minerals extraction site.

As part of a planning application for mineral extraction, it is a requirement of Jersey law to prepare and submit an environmental impact assessment EIA. The EIA process would be used to scope, identify and assess all relevant environmental impacts of proposed mineral extraction at the site – including potential impacts on air quality. This will help to determine whether a proposal to extract minerals from a site was acceptable: in the event that it was not, planning permission would not be forthcoming, notwithstanding the safeguarding policy provision of the Island Plan.

This EIA process could include the requirement for a dust assessment.

Planning guidance on minerals dust assessment in the UK states:

“Assessments should be proportionate to the nature and scale of development proposed and the level of concern about air quality, and because of this are likely to be locationally specific.”

It goes on to advise that supporting information provided for planning applications should:

- *assess the existing air quality in the study area (existing baseline);*
- *predict the future air quality without the development in place (future baseline);*
and
- *predict the future air quality with the development in place (with mitigation).”*

It also identifies that there are five key stages to a dust assessment study:

- *establish baseline conditions of the existing dust climate around the site of the proposed operations;*
- *identify site activities that could lead to dust emission without mitigation;*
- *identify site parameters which may increase potential impacts from dust; • recommend mitigation measures, including modification of site design; and*
- *make proposals to monitor and report dust emissions to ensure compliance with appropriate environmental standards and to enable an effective response to complaints.”*

As the report attached to the amendment acknowledges, there is no data available for the impact of existing quarrying activity around the island's existing operational quarries.

It is only in the context of planning application, with an associated EIA that might include a dust assessment, would information about the potential impact of quarrying activities in air quality be brought forward for consideration and assessment. This might also lead to an appropriate strategy for mitigation, and monitoring, -where the data supports such - which is also sought by the amendment.

2. The amendment is also **inappropriate** because there is no basis to introduce a buffer zone around the island's proposed mineral extraction sites at this time.

[The Guidance on the Assessment of Mineral Dust Impacts for Planning](#) (2016) Institute of Air Quality Management, cited by the deputy in his report, sets out a number of relevant points relating to the potential impacts of dust arisings from operational quarry sites:

Dust arising from the quarry can reduce amenity in the local community due to visible dust plumes and dust soiling. The generally coarser dust that leads to these effects may, therefore, be referred to as 'disamenity dust'.

*The smaller dust particles can remain airborne longer, potentially increasing local ambient concentrations of suspended particulate matter (e.g. PM10 and to a lesser extent PM2.5), which is associated with a range of health effects. This guidance uses PM10 as the health indicator of airborne particles to be consistent with national Planning Practice Guidance (nPPG5) for mineral sites. **Mineral site impacts are more likely to be associated with coarse particulate matter (i.e. PM10).***

The most noticeable air quality impact likely to arise during minerals activities is dust accumulation resulting from deposition, which can lead to disamenity due to the soiling of surfaces.** The most recent survey of complaints to local authorities suggests that **only 1% of dust complaints relate to mineral excavations.

The other potential air quality impact is the increase in ambient suspended particulate matter (PM) concentrations local to the site. As noted earlier, the PM10 fraction is relevant to health outcomes. For quarries most of this suspended dust will be in the coarse sub-fraction (PM2.5-10), rather than in the fine (PM2.5) fraction.

It should be noted that the national air quality objectives for these pollutants are rarely exceeded close to most mineral sites, as they are typically located in rural areas where there is generally a much smaller contribution from traffic pollution than in urban areas.

As the report attached to the amendment acknowledges, there is no data available for the impact of existing quarrying activity in Jersey around the island's existing operational quarries.

The deputy suggests that whilst there is no available data, that it is justified to impose a buffer around proposed mineral extraction sites on health grounds, and that this is a position that has been adopted by other countries.

It clearly states in the guidance cited by the deputy, however, that

*Caution should be used in attempting to apply this guidance elsewhere and careful consideration should be given to its applicability: **overseas works are often significantly larger and there are likely to be different climates, working practices and impact assessment criteria.***

The guidance states that to determine the significance of dust impact from quarrying operations requires *the application of professional judgement by a competent, suitably qualified and experienced air quality professional.*

On the basis of the above, the Minister considers it to be entirely inappropriate and completely unsubstantiated to seek to impose a random 250m buffer zone around any potential extraction sites when there is no actual data to justify such a buffer zone.

It is relevant to note that no complaints have been made to IHE (Regulation) about dust arisings from the existing quarry at La Gigoulande.

Whilst not having considered this later amendment, the independent planning inspectors, when considering the issue of the safeguarding of land for mineral extraction at Field MY966, commented, in their report, as follows (see section 9 of their report):

9.12 The need for minerals from an expanded quarry at La Gigoulande has to be balanced with potential environmental impacts....

*9.13 With regard to the impact of quarrying on residential amenity, the nearest properties are about 115m or so to the west. **There is some noise from blasting at present, experienced as a dull thud during a site visit, at the nearest point to the blasting area about 150m away on a public highway, La Chève Rue. There was no sign of dust but rather more noise from falling rock.** However, **this is experienced once, possibly twice, a week for a few seconds.** The blast was accompanied by a slight vibration under the road surface. The nearest homes to the west would be further away from the new operations at the extended site. Some properties to the south would be a similar distance from the new operations as are the houses on La Chève Rue from present operations. While we can appreciate residents' real concerns about increased disturbance, **we believe that extending the quarry further south would not create an unacceptable level of disturbance,** given the distances involved, including the main access point, and the frequency of blasting.*

9.14 The operator of a long-established hotel, Greenhills, located about 250m to the south of the proposed extension, expressed grave concerns about the impact on business if potential visitors saw that a quarry was located closer to the hotel than at present. We appreciate there may be potential marketing problems but the affect on visitor numbers is difficult to predict with certainty, especially if the quarry continues

*to extract materials in accordance with normal reasonable conditions about methods of operation. The relationship of the uses is not ideal, but we do not believe that it would be so severe a problem as to preclude the principle of safeguarding the site. **Much more detailed work would be required at EIA stage to maximise appropriate mitigation of these potential impacts.***

*9.15 In conclusion, it appears that continued production of aggregates at La Gigoulande Quarry is required to meet estimated needs for the next ten years or more. ... **There are clearly some environmental costs associated with quarry expansion which should not be dismissed lightly.** These include bringing noise, vibration and dust closer to some residential properties and Greenhills Hotel, the loss of some trees and a less direct routeing of La Rue Bechervaise. However, we concur with the Minister's view set out in SR62 that **there is nothing of such weight as to preclude the expansion of the quarry in principle.** We concur with the recommendation in the Arup report that the future use of the La Gigoulande Quarry as an integrated minerals and waste asset (including extension of extraction into field MY966) rather than a water reservoir, better meets the island's needs. **We support the safeguarding allocation on the DBIP.***

Island Plan 2022-25: Approval – eighty-fourth amendment – Amendment to Policy CI3

[\(Link to return to table\)](#)

The Minister is minded to **ACCEPT** this amendment.

Whilst the Minister is minded to accept the amendment, it should however be emphasised that the plan already makes adequate provisions to deal with the development of the hospital on an existing healthcare site or sites, as per Policy CI2 - Healthcare facilities. This part of the amendment (b) is therefore a duplication.

Part (c) of the amendment is considered a helpful addition, which will give the policy and site appropriate flexibility for alternative uses to be allowed, if a scenario requiring this were to arise.

Island Plan 2022-25: Approval – eighty-fifth amendment – Policy EV1

[\(Link to return to table\)](#)

The Minister is minded to **REJECT** this amendment.

This amendment seeks to add specific policy provisions to the policy which deals with visitor accommodation - Policy EV1 – but only to apply them to proposals to change the use of visitor accommodation in St Brelade’s Bay, where premises offer more than 85 visitor beds.

There are two provisions that are proposed to be added.

- the first seeks to subject any such proposal to a market test;
- the second, seeks to ensure that proposals to change the use of visitor accommodation in St. Brelade’s Bay do not have an adverse impact on the intrinsic character of the bay as a tourist destination area.

The Minister is unable to support this amendment for the following reasons:

In response to the general reduction in visitor bed space in the island, the Minister for the Environment requested that the independent planning inspectors assess the potential introduction of a change to Policy EV1 to better regulate change in the island’s visitor bed stock throughout the island ([see the Minister’s post-consultation response SR 59 - Policy EV1 - Visitor accommodation](#)) at the examination in public. The Minister’s suggested change included provisions similar to those proposed for St Brelade’s Bay in this amendment.

The inspectors’ view of the specific provisions; and the overall intent of the policy, as set out in their report ([see para. 7.11-7.14 pp.67-69 of their report](#)) are as follows:

‘the need to demonstrate a lack of market demand for such premises could take a lengthy period to fulfil, during which businesses would suffer continued opportunity or real unrecoverable costs. Much depends on the realism of sale prices, which would be the matter of some subjectivity and debate. These factors could deter investment in the businesses, and impinge on the ability of the hotel business to obtain bank lending for improvements, since there would be little security against loans through the prospect of sale for residential conversion if the business failed.

the other tests of the policy, requiring no unacceptable adverse effect on the tourist area and that the overall benefit to the community from the scheme should outweigh any harm, could also be subjective in interpretation and monitoring

*Overall, we consider **the revised policy as suggested in SR59 is unlikely to achieve the broader objective of supporting the tourist industry and would create significant difficulties regarding implementation** in terms of devising suitable tests and monitoring. **A means or viability test is unlikely to be effective and could well prove to be counter-productive to the aim of supporting a vibrant tourist economy.** We recommend the policy remains as drafted in the DBIP.’*

The inspectors also considered whether it was appropriate to include or exclude specific areas of the island in relation to the proposed policy. They commented as follows:

There is no evidence that any one tourist area has suffered more than others and it would not be appropriate to remove any particular tourist area, such as St Brelade’s

Bay, from the policy. It may be that a more location specific policy might be appropriate if supported by evidence prepared for the St Brelade's Bay Improvement Plan, as set out in Proposal 17, which the Minister, in SR60, has agreed to complete by December 2023,

The amendment suggest that further research has been undertaken to support the restriction of the application policy, not only just to St Brelade's Bay; but just to visitor accommodation offering more than 58 beds. The research appears to be based on informal dialogue between the St Brelade's Bay Association and general managers or owners of hotel establishments in the bay. It is not supported by any written submission from hotel operators about their acceptance of such provisions.

The introduction of a threshold would appear to undermine the purpose and further limit the scope of the original amendment

As set out above, it is clear that the Minister has already tested the introduction of similar provisions, for application across the island, which has not received support, either from the industry or from the independent planning inspectors. There is considered to be no justification to seek their re-introduction, as proposed by the amendment; or to specifically focus them on St Brelade's Bay.

Island Plan 2022-25: Approval – eighty-fifth amendment – amendment

[\(Link to return to table\)](#)

The Minister is minded to **REJECT** this amendment.

The Minister does not support the principle of the amendment, as explained in comments on amendment 85.

The introduction of a threshold into the operation of the policy, however, does not appear to be substantiated; and would appear to limit the scope and purpose of the policy.

Island Plan 2022-25: Approval – eighty-fifth amendment – second amendment

[\(Link to return to table\)](#)

The Minister is minded to **REJECT** this amendment.

The Minister does not support the principle of the amendment - as explained in comments on amendment 85 - and, therefore, cannot support the introduction of a threshold for its detailed operation, as proposed by this further amendment.

The introduction of a threshold would appear to be without any particular justification or purpose; and would further limit the potential application, not only to just St Brelade's Bay, but also to a limited number of visitor accommodation premises within it.

The original amendment proposed a threshold of 58 beds; this further amendment proposes to increase this to visitor accommodation offering more than 136 beds. This would appear to narrow the focus of the proposed policy to just the St Brelade's Bay Hotel and the Hotel L'Horizon.

Minister for the Environment
Consolidated Comments on P.36/2021



This would appear to undermine the purpose and scope of the original amendment; and to be without any justification.

The Minister considers the creation of a specific policy provision applying to just two hotels, to be entirely inappropriate.

Island Plan 2022-25: Approval – eighty-sixth amendment – St. Brelade’s Bay Improvement Plan

[\(Link to return to table\)](#)

The Minister is minded to **ACCEPT** this amendment.

The proposed amendment, requiring explicit reference to be made to part of the evidence base of for the draft plan, is considered to be entirely superfluous but benign.

The report makes reference to the need to ensure that the views derived from engagement are respected in the development of the improvement plan. Whilst reference to earlier engagement will be made, and may help shape the development of the improvement plan itself, any proposals which emerge within the improvement plan will be the subject of further engagement.

Island Plan 2022-25: Approval – eighty-seventh amendment – Green Backdrop Zone and Shoreline Zone – Consolidated

[\(Link to return to table\)](#)

The Minister for the Environment is proposing this consolidating amendment.

The [report](#) provides the detailed explanation and justification of the changes proposed by the Minister.

Island Plan 2022-25: Approval – eighty-seventh amendment – amendment

[\(Link to return to table\)](#)

The Minister is minded to **REJECT** this amendment to the amendment.

The proposed further amendment from the Connétable of St Brelade, seeks to add further provisions to this policy, to more closely regulate development in this part of the bay; and to promote greater landscape integration. **This is considered an unnecessary, overcomplicated and unjustified amendment.**

The shoreline zone, and the properties within it, that would be affected by this proposed further amendment is defined at appendix 1.

The Minister cannot support the introduction of either provision proposed by the amendment, as set out below:

Part (ii) First, the policy objective of seeking to prohibit the extension of buildings for residential use in this area is considered to be wholly unjustified and inappropriate.

The area forms part of the built-up area of St Brelade's Bay and will have a number of residential properties within it. To seek to impose a policy constraint that seeks to prohibit their extension seems to be unduly draconian. It is also probably an undue burden on the rights of local residents to reasonably enjoy their private property.

The report provides no justification for the addition of this provision.

Any proposal for the extension of a building for residential use should be considered relative to normal planning considerations – such as the impact on the character of the area; impact on neighbouring property; and an assessment of the proposal relative to the nature of development on the existing site. The draft plan provides ample and adequate policy provision to enable these factors to be considered.

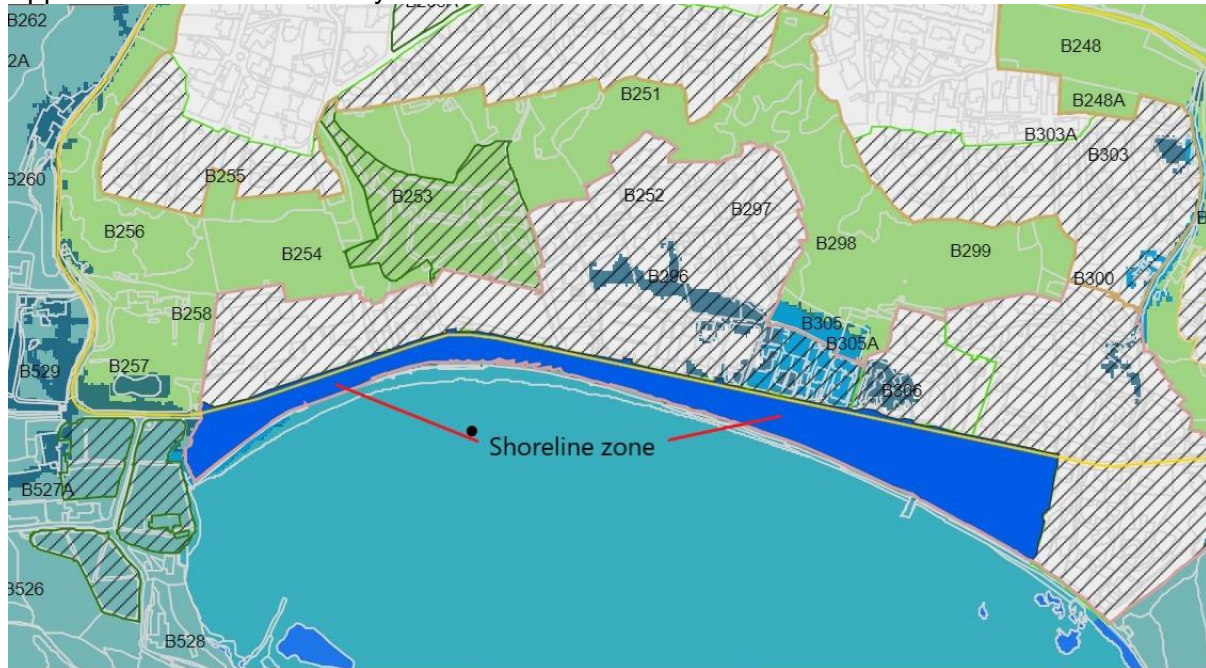
Part (iii) The second policy provision sets an objective of seeking to ensure that development in the St Brelade's Bay shoreline zone integrates, through the provision of landscaping, with other planning zones, including the green backdrop zone; the green zone; and the Coastal National Park. This is somewhat confusing as any site within the shoreline zone is not in any of the other planning zones cited – by definition, it is in the shoreline zone – and thus can only be properly integrated with the shoreline zone.

The draft plan already requires development to have regard to, respect and complement its local context and character – whichever zone it is in – particularly in relation to the provision of landscaping. These provisions are set out in Policy SP3 – Placemaking; Policy SP5 – Protecting and improving the natural environment; Policy GD6 – Design quality; and Policy NE2 – Green infrastructure and networks.

When assessing development proposals, the plan must be read and applied as a whole, and thus, all relevant policies will apply to the assessment of development proposals, including those listed above.

On this basis, the addition of the second proposed provision is considered neither to be particularly clearly expressed or necessary, and its intent is addressed by other policy provisions in the plan.

Appendix 1: St Brelade's Bay shoreline zone



Island Plan 2022-25: Approval – eighty-eighth amendment – Marine Spatial Plan

[\(Link to return to table\)](#)

The Minister for the Environment is proposing this consolidating amendment.

The [report](#) provides the detailed explanation and justification of the changes proposed by the Minister.

Island Plan 2022-25: Approval – eighty-eighth amendment – amendment

[\(Link to return to table\)](#)

The Minister is minded to **REJECT** this amendment to the amendment.

This amendment to an amendment seeks to do two things:

1. To designate marine protected areas covering at least 30 per cent of Jersey's waters by 2025.
2. To request that the current and future network of marine protected areas would constitute a national marine park.

As the Minister for the Environment has set out in his detailed comments on the original amendment, marine protected areas (MPAs) are essentially designated under the OSPAR convention and given effect through local fisheries legislation. In any event, Jersey is required to abide by the terms of the UK/EU TECA before introducing fisheries conservation measures. These measures need to be made on the basis of marine research and evidence, and subject to scrutiny by the EU and its specialist committees. To adopt the proposition unilaterally in this respect, in advance of internationally agreed procedures, cannot be recommended.

It is understood that the local fishing industry (represented by the JFA) do not support this proposal as currently drafted.

In considering anything of this nature, through more appropriate means, it is also required that a more targeted approach be taken.

The process of defining the extent and designating MPAs; and the regulation of activities within them (i.e. fishing), clearly sits outside of the scope of the Island Plan, the purpose of which is prescribed by the Planning and Building (Jersey) Law and is clearly focused on the regulation of development activity.

Similarly, the notion of a national marine park designation has no basis or meaning in local planning legislation.

The proposed amendment to the amendment is both inappropriate and ineffectual.

Island Plan 2022-25: Approval – eighty-ninth amendment – Historic Environment Policies

[\(Link to return to table\)](#)

The Minister for the Environment is proposing this consolidating amendment.

The report provides the detailed explanation and justification of the changes proposed by the Minister.

Island Plan 2022-25: Approval – eighty-ninth amendment – amendment

[\(Link to return to table\)](#)

The Minister is minded to **REJECT** this amendment to the amendment.

If the Deputy's proposed amendment to the Minister's amendment is accepted, **this will result in the loss of remaining historic window frames, in their entirety**, throughout the island, in response to proposals for double-glazing.

This loss of historic fabric and detailing and change in appearance is likely to reduce the significance of the windows, and the host building, and irrevocably alter the character and quality of the island's historic environment.

This is contrary to:

- the island's obligations under the **Granada Convention** (Convention for the Protection of the Architectural Heritage of Europe) which requires
 - at article 3 'each party to take statutory measures to protect the architectural heritage
 - at article 4 'each party to prevent the disfigurement, dilapidation or demolition of protected properties.
- the **Common Strategic Policy** which states that
 - we will protect and value our environment...by improving the built environment, to retain the sense of place, culture and distinctive local identity
- the emergent **Heritage Strategy** which sets, as one its four strategic objectives, as
 - the protection of heritage assets to pass them on to future generations in better condition
- **international best practice**, which recognises that the protection of historic windows is not just about aesthetic value, but should also include consideration of evidential value, historic value and communal value (see extract at appendix 1: *Conservation Principles, Policies and Guidance for the Sustainable Management of the Historic Environment* (2008) Historic England)

The policy for the protection of historic windows set out in the draft plan already provides flexibility for the installation of double-glazing in historic windows. The Minister has also accepted further amendment to the policy to give greater emphasis to this.

The Deputy is not, however, satisfied with the introduction of greater flexibility allowing the use of double-glazing in historic buildings, where it can be accommodated; he also wants to change the policy to allow the entire fabric of historic windows to be replaced (e.g. the entire window frame), even where it is capable of repair. This will result in the wholesale loss of entire historic windows, irrevocably harming the character and appearance of the island's historic environment.

In the report accompanying his amendment, the deputy provides a citation from a local joinery company, to represent some of the issues faced. Clearly, these views are presented from singular perspective of a joiner that is in the business of providing new windows.

The following comments are offered in response to the summary of issues raised:

- 1. Timber windows which are over 100 years old, cannot be made to last for ever, no matter what you do to them. Timber eventually decays, especially when it is subject to modern day internal temperatures. It is inevitable that an historic window eventually requires full replacement. (Amd 89 amd: report).**

Traditional windows can often be simply and economically repaired, usually at a cost significantly less than replacement. For timber windows this is largely due to the high quality and durability of the timber that was used in the past (generally pre-1919) to make windows.

*Properly maintained, old timber windows can enjoy extremely long lives. It is rare to find that all windows in an old building require new sections. Many historic components continue to give service after 150, 200 or even 250 years. (Historic England (2017) **Traditional windows: their care, repair and upgrading**)*

- 2. Even by using modern day technological advances in glass manufacturing, existing windows cannot be up-graded by merely swapping out the historic glass for double glazed units double glazed units. Where this is attempted, the glass unit still fails over time. (Amd 89 amd: report)**

The function of insulated glass units (IGUs i.e. double-glazing units) depends on the seals that prevent air and moisture from entering the gap; when these fail, the units will become much less thermally effective and are also likely to fog because of internal condensation. The lifespan of current IGUs is estimated to be between 15 and 25 years.

*In energy terms IGUs have pay-back periods that can greatly exceed their design life, especially for units filled with inert gases. When the seals fail and let in water vapour this then condenses on the interior of the glass. They are difficult to repair and also much more difficult to recycle than plain glass - discarded double-glazed windows have become a major contributor to landfill. The energy required in manufacturing and transportation can also be significant in the overall equation. Special glazing compounds need to be used when reglazing with IGUs because standard linseed oil putty can damage the seals to the units. (Historic England (2017) **Traditional windows: their care, repair and upgrading**)*

There is continued and rapid changes to the technology for insulation to glazing. The development of thinner IGU's from 16mm to 7.5mm has allowed the change in policy to swap out modern, single glazing for these thinner units as many mid to later 19th century frames can accommodate this. The next major change will be the introduction of glazing films raising the thermal performance of single glazed windows. Currently films can help meet Byelaw standards when changes to a building require Byelaw approval. Listed Buildings are exempt from application of Part 11 standards: Conservation of Fuel and Power, under Part 2.5(a), but best practice allows improvements to historic window performance to contribute to the overall thermal efficiency calculations for a building. With a mechanical overhaul, application of thermal films and draught proofing the thermal performance of a historic single glazed window can be raised to better meet Byelaw standards when considered as part of a whole building approach. Working with emerging technology has allowed the retention, repair and reuse of many historic windows over the last 10 years.

- 3. Replacement window frames will inevitably have to slightly change the appearance of the glazing bars. This is not deemed to be a significant change. (Amd 89 amd: report)**

If used in multi-paned windows, IGUs will generally be less efficient than secondary glazing since even the most efficient units will not overcome thermal bridging through the frame and glazing bars.

For this reason and for cost effectiveness, many replacement windows are made instead with a single IGU with timber glazing bars or leaded lights applied to the surface.

*This loss of historic fabric and detailing and change in appearance are likely to reduce the significance of the window and the host building. (Historic England (2017) **Traditional windows: their care, repair and upgrading**)*

- 4. A refurbished window unit will require more frequent maintenance to compensate for its age and the lack of durability of its timber. With each repair, less of the window frame will remain, till such a point this the unit has to be contemned and full replacement be considered. (Amd 89 amd: report)**

The purpose of repair is to replace or reinforce those parts of the window that have decayed so badly that they can no longer function as intended. There is a widely held perception that repairs are shortlived, especially those to external softwood joinery, and that the result is inferior to a new window. There is no doubt that repairs will fail quickly if they are poorly designed executed or carried out with unsuitable materials. However, properly carried out repairs can extend the lifetime of a window for many years.

*Many 18th and 19th centuries sash windows continue to provide excellent service thanks largely to the high quality timber used in their manufacture. Most were made from heartwood of imported Scots pine (*Pinus sylvestris*) grown slowly in natural forests.*

However, by the early 20th century, trees cultivated on plantations were an increasingly important source of timber. Plantation grown trees are encouraged to grow to a marketable size in the shortest possible time. As a result, they contain a larger proportion of sapwood than slow-grown trees. Sapwood is more permeable than heartwood and contains sugars and starches that provide an excellent food source for fungi; this makes it susceptible to decay and unsuitable for external joinery. Nevertheless, in the post-war years, it became common practice to use timber containing a high proportion of sapwood for many joinery tasks. In Jersey the results of this can be seen in the large number of timber windows, dating from the 1970's and 80s, which now require replacement.

*Therefore, it makes good sense to retain old joinery wherever it is sound. When repair or replacement is required, heartwood of one of the more durable softwood species, such as Scots pine/ European redwood (*Pinus sylvestris*) or imported Douglas fir (*Pseudotsuga menziesi*), should be used. As it is very difficult to ensure that timber is entirely free of sapwood, pre-treatment with preservative is generally recommended. An alternative would be to use chemically modified 'acetylated' softwood which is exceptionally durable, and dimensionally stable. (Historic England (2017) **Traditional windows: their care, repair and upgrading**)*

- 5. There are reputable local joinery firms who are more than able to offer equivalent double glazed replacement window systems. Through an accredited**

registration process, it might be possible to avoid the rigour and expense of a formal planning application process, which is burdensome and expensive to run for all parties. Accreditation could be subject to annual review to ensure standards are maintained. (Amd 89 amd: report)

The number of replacement window applications in 2021 was 34 applications of which four were refused (an 89% approval rate).

Data from recent years shows a similar picture, highlighting that this area is the subject of a low level of activity (generally lower than 50 applications a year), where the rate of approval is high (at over 75%).

Applications for works to listed buildings, which would not otherwise require planning permission, are fee-exempt.

<i>Year</i>	<i>Applications</i>	<i>Approved</i>	<i>Refused</i>	<i>Withdrawn</i>
<i>2014 - 2015</i>	<i>24</i>	<i>32</i>	<i>2</i>	<i>4</i>
<i>2015 - 2016</i>	<i>39</i>	<i>32</i>	<i>4</i>	<i>3</i>
<i>2016 - 2017</i>	<i>50</i>	<i>41</i>	<i>4</i>	<i>5</i>
<i>2017 - 2018</i>	<i>52</i>	<i>45</i>	<i>5</i>	<i>2</i>
<i>2018 - 2019</i>	<i>37</i>	<i>32</i>	<i>2</i>	<i>2</i>
<i>Total</i>	<i>202</i>	<i>182</i>	<i>17</i>	<i>16</i>

In light of the above, the introduction of some form of accreditation scheme is considered neither to be justified, proportionate or appropriate.

In fact it is highly likely that the cost of monitoring the scheme would far outweigh the current costs of processing fee-free planning applications.

6. The repair of an historic window in situ is expensive, and ultimately results in a compromised aesthetic solution, with visible scarf joints in the timber sections. (Amd 89 amd: report)

Whilst it is preferable, wherever possible, for repairs to window frames to be carried out in-situ, it is entirely acceptable for sashes and casements to be removed for repair either on site or in a joiner's workshop. This is the approach agreed for many repairs to ensure a full assessment and repair can be made.

Where past repairs have broken down then this is usually the best approach. When this shows the box has failed we will allow replacement and reuse of the sash units. However, the cheapest and usual repair is to replace the cill – this is a repair and needs no specific consent.

7. Surely the listing details of could seek to preserve the very few exemplar windows which exist. But the shift should be to appropriate replacement by accredited joinery firms. (Amd 89 amd: report)

There would be an onerous cost associated with the resurvey work required to assess each Listed building with windows, circa 2,500, to confirm where such 'exemplar' windows existed 'in situ'. However, the amendment, as proposed, would serve to remove the requirement to repair the fabric of historic window frames, even where they are capable of repair. It does not allow for exceptions to be made.

On this basis, the proposed change to the policy would serve to permit the removal of any historic window frame in its entirety, regardless of its significance and whether it is capable of repair.

A senior architect stated that – “It’s hard defending policies to homeowners, when the logic to the policy just isn’t there at the moment.” (Amd 89 amd: report)

The logic of the approach of retaining existing historic building fabric, whilst at the same time, improving thermal efficiency, is entirely sound and backed up by research (see appendix 2).

Energy efficiency is now a major priority for most building owners, for comfort, fuel economy and to limit the waste of natural resources and reduce carbon emissions. The thermal efficiency of historic buildings can be greatly improved without replacing windows that contribute to their significance. Rather than focusing entirely on windows, it is better to consider energy conservation measures that address the thermal efficiency of the whole of the building. This should include not just physical measures, such as loft insulation and draught-proofing, but also the efficiency of heating systems and controls and the way these are used.

In every case, the aim should be to strike an appropriate balance between energy conservation and building conservation. Adopting a ‘whole building’ approach can help in understanding where energy goes and identifying less harmful options to achieve energy savings.

Island Plan 2022-25: Approval – eighty-ninth amendment – second amendment

[\(Link to return to table\)](#)

The Minister for the Environment is proposing this amendment to amendment 89.

The [report](#) provides the detailed explanation and justification of the changes proposed by the Minister.

Island Plan 2022-25: Approval – ninetieth amendment – Overall housing supply

[\(Link to return to table\)](#)

The Minister for the Environment is proposing this amendment.

The [associated report](#) provides the detailed explanation and justification of the changes proposed by the Minister.

Island Plan 2022-25: Approval – ninety-first amendment – Affordable housing provision – Consolidated

[\(Link to return to table\)](#)

The Minister is minded to **ACCEPT** this amendment unamended.

This is the Minister's own amendment, for reasons set out in:

- i. The report accompanying [Amendment 91](#)
- ii. Section 3.0 of the Minister's housing site position statement

Island Plan 2022-25: Approval – ninety-first amendment – amendment

[\(Link to return to table\)](#)

The Minister is minded to **REJECT** this amendment to the amendment, on the basis it would remove a good housing site to provide affordable homes, which has been endorsed as such by the planning inspectors. [\(See report \(p.32 & 43\)\).](#)

Island Plan 2022-25: Approval – ninety-first amendment – second amendment

[\(Link to return to table\)](#)

The Minister is minded to **REJECT** this amendment to the amendment, on the basis it would remove a good housing site to provide affordable homes, which has been endorsed as such by the planning inspectors. [\(See report \(p.35-36\)\).](#)

Island Plan 2022-25: Approval – ninety-first amendment – third amendment

[\(Link to return to table\)](#)

The Minister is minded to **REJECT** this amendment to the amendment, on the basis it would remove a good housing site to provide affordable homes, which has been endorsed as such by the planning inspectors. [\(See report \(p.38\)\).](#)

Island Plan 2022-25: Approval – ninety-first amendment – fourth amendment

[\(Link to return to table\)](#)

The Minister is minded to **REJECT** this amendment to the amendment, as an alternative or additional affordable housing site.

This site is presently covered in scrub and trees, the loss of which would have implications for biodiversity. It is considered to form part of the group of the fields that comprise the 'northern village fringe fields': together, they form a physical and visual buffer between the coast and St John's Village. As such, the site is considered to be of high sensitivity to housing development and that any development here would adversely affect the landscape character of the area and damage the setting of the village and result in a ribbon of development encroaching into the open, rural landscapes that stretch up to the north coast. Whilst adjacent to the existing shelter housing complex at Maison Le Vesconte the proposed development is a separate entity and could not be easily integrated.

Local drainage network results in flooding in La Route du Nord. As a minimum would need to upsize the local drainage infrastructure.

Island Plan 2022-25: Approval – ninety-first amendment – fifth amendment

[\(Link to return to table\)](#)

The Minister is minded to **REJECT** this amendment to the amendment. The Minister's position is set out in section 3.0 of the Minister's housing site position statement, where it is however, highlighted that whilst the Minister does not support the allocation of this site, it **could be considered as a potential alternative**.

The site can be reasonably integrated into St John's village and subsequently performed relatively well against the spatial and suitability analysis. It is considered to have a limited physical and visual connection to the historic village core and is visually discrete and could thus absorb new development reasonably well.

Access is via a parish by-road and therefore has limited capacity for increase in vehicular traffic.

The downstream drainage system does not have any spare capacity. Would need to consider pumping flows directly to Rue Des Buttes pumping station which may need upgrading.

The planning inspectors commented in their report that this would be a more appropriate site than J229 to consider for development in St John. (See their [report \(p.48\)](#))

**Island Plan 2022-25: Approval – ninety-second amendment – Policy H8 - Housing
outside the built-up area**

[\(Link to return to table\)](#)

The Minister for the Environment is proposing this consolidating amendment.

The [report](#) provides the detailed explanation and justification of the changes proposed by the Minister.

Island Plan 2022-25: Approval – ninety-third amendment – Policy ME1 - 20% reduction in target energy rate

[\(Link to return to table\)](#)

The Minister for the Environment is proposing this amendment.

The [associated report](#) provides the detailed explanation and justification of the changes proposed by the Minister.

Island Plan 2022-25: Approval – ninety-fourth amendment – Policy CI1: Education facilities – consolidated

[\(Link to return to table\)](#)

The Minister for the Environment is proposing this amendment.

The [associated report](#) provides the detailed explanation and justification of the changes proposed by the Minister.

Note the Minister is also supportive of proposed Amendment 08 to safeguard Gas Place for education.

Island Plan 2022-25: Approval – ninety-fifth amendment – Policy CI5: Sports, leisure and cultural facilities

[\(Link to return to table\)](#)

The Minister for the Environment is proposing this consolidating amendment.

The [associated report](#) provides the detailed explanation and justification of the changes proposed by the Minister.

Note the Minister does not support the related amendment 73 to include field MN727 in this policy.

Island Plan 2022-25: Approval – ninety-sixth amendment – Travel and transport policies

[\(Link to return to table\)](#)

The Minister for the Environment is proposing this consolidating amendment.

The [associated report](#) provides the detailed explanation and justification of the changes proposed by the Minister.

**Island Plan 2022-25: Approval – ninety-seventh amendment – Safeguarded minerals
site: Simon Sand and Gravel**

[\(Link to return to table\)](#)

The Minister for the Environment is proposing this consolidating amendment.

The [associated report](#) provides the detailed explanation and justification of the changes proposed by the Minister.

Island Plan 2022-25: Approval – ninety-eighth amendment – Tabor Park

[\(Link to return to table\)](#)

The Minister for the Environment is proposing this consolidating amendment.

The [associated report](#) provides the detailed explanation and justification of the changes proposed by the Minister.

Island Plan 2022-25: Approval – ninety-ninth amendment – Minor Proposed Map Changes

[\(Link to return to table\)](#)

The Minister for the Environment is proposing this amendment.

The [associated report](#) provides the detailed explanation and justification of the changes proposed by the Minister.

Island Plan 2022-25: Approval – one-hundredth amendment – Sustainable Communities Fund

[\(Link to return to table\)](#)

The Minister for the Environment is proposing this amendment.

The [associated report](#) provides the detailed explanation and justification of the changes proposed by the Minister.

Island Plan 2022-25: Approval – one-hundred and first amendment – WER4 Land Reclamation

[\(Link to return to table\)](#)

The Minister for the Environment is proposing this amendment.

The [associated report](#) provides the detailed explanation and justification of the changes proposed by the Minister.

Island Plan 2022-25: Approval – one-hundred and second amendment – Protecting landscape and seascape character

[\(Link to return to table\)](#)

The Minister for the Environment is proposing this amendment.

The associated report provides the detailed explanation and justification of the changes proposed by the Minister.