



Second Stage Consultation for the Island Development Plan

Summary of Public Responses

NOVEMBER 2013

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1 Executive Summary

1.1 Introduction

- 1.1.1 This document provides a summary of the second stage public consultation carried out as part of the formulation of the new Island Development Plan. The consultation addressed some of the key messages, issues and potential options that emerged during the Environment Department's evidence gathering as part of the Plan Review.
- 1.1.2 The 1st stage public consultation in the plan review process took place in early 2012 and 'threw the net wide' to inform as many people as possible about the Plan Review and to seek their views and opinions on a wide range of topics. The results of the 1st stage public consultation, together with important information and evidence gathered by the Environment Department, have contributed to a series of evidence reports which will help to inform future land use policy for the Island. The evidence reports and a report of the results of the 1st stage public consultation are available to download from the State's website at www.gov.gg/planreview.
- 1.1.3 The purposes of the 2nd stage public consultation were to give feedback on some of the evidence gathered to date, to maintain the Department's commitment to keep the public informed about the progress of the plan review and to seek views on a number of key issues and messages that have emerged principally in the areas of:
- Main & Local Centres;
 - Housing;
 - Employment;
 - The Natural and Built Environment, and;
 - Open Space and Recreation.
- 1.1.4 The public consultation period ran between 29th July and 13th September 2013.

1.2 Parameters for Consultation

- 1.2.1 The Strategic Land Use Plan was approved by the States in 2011 and provides both general guidance and some specific direction to the Environment Department on the important planning issues affecting all sectors of the population, the economy and the environment of Guernsey, when preparing the Development Plan. The new Island Development Plan must be prepared in accordance with the aims and objectives of the approved Strategic Land Use Plan (SLUP). The SLUP sets out the spatial strategy for Guernsey and directs that:
- 1.2.2 *"Development (must be) concentrated within and around the edges of the urban centres of St Peter Port and St Sampson/Vale with some limited development*

within and around the edges of the other main parish or local centres to enable community growth and the reinforcement of sustainable centres.”

- 1.2.3 This specifically directs the Environment Department in terms of the location of new development and the policies of the new Island Development Plan must accord with the approved Spatial Strategy.
- 1.2.4 Some of the responses to the 2nd stage public consultation included comments which are contrary to the States approved Spatial Strategy. Although these comments have been noted and are included in this report they cannot, therefore, be taken forward in the drafting of policies for the new Island Development Plan

1.3 Summary of responses

- 1.3.1 Overall there was a positive response to the 2nd stage consultation with written responses received from 81 people and organisations. Approximately 530 people attended the information sessions, talked to staff from the Environment Department and took away information on the Key Messages, Issues & Options.

Main & Local Centres

- 1.3.2 Support was expressed for the Spatial Strategy within the Strategic Land Use Plan, and how it keeps the majority of new development within and around the Main Centres. Respondents differed as to whether development should be contained solely within the Main Centres or more widely distributed around the edges of them.
- 1.3.3 In order to bring together development opportunities within the main centres into a single vision that builds a picture of how the Main Centres could look, feel and function in the future, a number of proposals were suggested focussing on provision of shops, restaurants and making the most of what the harbour can offer in Town and older peoples' housing, bulky retail and freight facilities at the Bridge (including Leales Yard).
- 1.3.4 There was general support for the range of services and facilities used as sustainable indicators to identify the potential Local Centres. A range of suggestions were made with regard to the methodology used in identifying the potential Local Centres and some additional indicators were suggested. It was suggested that some specific key facilities should always be required to make a sustainable Local Centre rather than allowing any five on the list. There was support for improving the role and sustainability of all Local Centres in ways appropriate to each individual centre. Ranking of Local Centres according to level of provision of services/facilities was suggested, with a view to concentrating development at the larger Local Centres.
- 1.3.5 Support was shown for Local Centres at Cobo, St Martin, L'Islet and Capelles with some suggestions made as to their extent. A few concerns were raised regarding designation of Local Centres at L'Aumône, St Peter and Forest and the urban Local Centres of the Rohais, Longstore and Trinity Square. Additional potential Local Centres were suggested at Vazon, Richmond and Rocquaine.

- 1.3.6 Respondents favoured development of housing and community facilities, including playing fields and educational facilities, over comparison retail in Local Centres. Small scale employment opportunities were however also desired in order to build thriving sustainable communities without the need to travel to the Main Centres. Parking, safe walking and cycling routes and recreational parks were desired in all centres, as were improvements in access to facilities for the less physically mobile. Flexible options for brown field and redundant vinery sites were sought.
- 1.3.7 The concept of Community Plans was supported, provided local residents, business owners and employees played a significant role in their formulation.

Housing

- 1.3.8 It was generally agreed that provision of housing is one of the most important issues facing the new Island Development Plan. The switch from relying solely on unpredictable 'windfall' sites to allocated housing sites is considered fundamental and is supported. However support was expressed for also continuing to allow for house construction on 'windfall' sites. Some felt that the Local Centres could accommodate some housing, in particular affordable or sheltered housing.
- 1.3.9 The use of the Strategic Housing Land Availability Assessment (SHLAA), its process and methodology, was supported and, together with the 'Call for Sites' process, was considered an effective and positive way to inform the demonstration of a 5 year land supply for housing. However it was stressed that the SHLAA should only be used to inform a separate process which would select the preferred sites for allocation to ensure independence, integrity and impartiality.
- 1.3.10 It was felt that the majority of new housing should be smaller units capable of accommodating first time buyers and those wishing to down-size.
- 1.3.11 Use of planning covenants is supported in bringing forward affordable housing. Tenure blindness (i.e. not differentiating between different tenures by their design or location) received strong support. Lessons should be learnt concerning delivery of affordable housing from positive and negative experiences elsewhere.
- 1.3.12 Of the potential options put forward in the consultation for consideration and discussion, Option 2, to vary the requirement for affordable housing between different areas of the Island, was the most supported and Option 4, a staircase approach, was least favoured. However it must be noted that the overall number of responses specific to the options posed was very small.

Employment

- 1.3.13 The Guernsey Employment Land Study 2013 profiles the existing accommodation and location of premises in the sectors of office, industry and storage/distribution and their potential future requirements. The consultation posed key questions about the potential future use of employment sites likely to become obsolete in the future and what type of sites might be suitable for new office and storage/distribution uses.

- 1.3.14 There was general agreement that industrial and storage sites should be combined and consolidated, perhaps through accommodating smaller entrepreneurial businesses within the larger vacant units.
- 1.3.15 Regarding office accommodation, it was felt that a focus should be given to provision of new sites and redevelopment of existing sites within the Main Centres whilst making provision for redundant offices to be converted to residential accommodation for those wishing to live and work in Town. Respondents raised concerns about the visual, infrastructure and amenity impact of further office development at Admiral Park and in waterfront locations. There was support for encouraging development of offices at Leale's Yard.
- 1.3.16 With regard to retail there was overall support for protecting the retail element of the Island's two main Centres of Town and the Bridge. Support was indicated for various elements of each of the three potential options for retail provision in the Main Centres put forward for discussion as part of the consultation. All agreed that the improved vitality and viability of the retail cores was an important goal. There was general consensus that retail within those Main Centres should be supported and not detracted from by retail development elsewhere. Accessibility for all was considered important.
- 1.3.17 It was felt that the new Development Plan represents an opportunity to improve current designations to protect agricultural land. Support was expressed for retention of viable farming land, agricultural and horticultural, thus retaining it as an unspoilt feature of the landscape, providing visual access to open space, and as a valuable asset for the cultivation of crops. This is considered equally important in both rural and more built up settings.
- 1.3.18 The value of sustainably located redundant vinery sites and the important contribution they can make to achievement of the objectives of the Island Development Plan were recognised. Many respondents supported return of redundant vineries in open countryside to agricultural land or for open community uses, such as allotments, and as wildlife habitat. Flexibility should be applied in identifying redundant vinery sites for development within and around the Main and Local Centres. There was support for release, in exceptional cases, of appropriate redundant vineries outside of the Main and Local Centres for small scale businesses or for generation of renewable energy.
- 1.3.19 Several suggestions were made as to how to incentivise the removal of redundant glass.

Natural & Built Environment

- 1.3.20 The Island is generally recognised as having a special character, contributed to by its unique culture and built heritage, sense of place, appearance and pattern of historic development and the interest and charm of these settlements. Generally the first stage of the Guernsey Character Study was commended and it was thought that this should set the standard through which Conservation Areas and Sites of Special Significance are selected.
- 1.3.21 There should be sufficient control within any new policies to ensure that the impact of development on character or appearance of a Conservation Area may

be taken into account. Option 2, a reduction in the number of Conservation Areas and an increase in their value by merger, extension, retention and carefully targeted removal, was the favoured option put forward in the consultation but with particular reference to the merits of the individual areas concerned.

- 1.3.22 The use of full character appraisals for each designated conservation area is supported. However respondents felt it was important that Conservation Areas, and policy protection of them, should only be designated where it was appropriate to do so and it was acknowledged that in some cases other policies, for example relating to Sites of Special Significance or protecting areas of high landscape value, may be a more appropriate route for managing the character of that place.
- 1.3.23 The approach to designation of Sites of Special Significance was welcomed and it was thought that this should set the standard through which selections are made. Designations should be based on content of the site rather than a character assessment. It was considered that protection of a site should always be preferable to offsetting.
- 1.3.24 Protection of the character of particular parishes was supported. Protection of the architectural character of St Peter Port was also considered important and it was felt that this could be achieved through careful design whilst also accommodating larger floor plate uses behind historic frontages.
- 1.3.25 Care should also be taken to protect the many individual buildings and small groups of buildings which stand outside designated Conservation Areas which also contribute to the character of Guernsey.

Open Space & Recreation

- 1.3.26 There was general consensus that open views contribute to well-being and should be protected. The high value of gaps which remain between existing development, particularly in more built up areas, was observed. Protection of green spaces and recreational facilities was considered important.
- 1.3.27 The majority felt strongly that the option of providing for demolition of ribbon development with replacement development elsewhere was unrealistic.
- 1.3.28 Provision of additional parks, gardens, civic spaces, play spaces and allotments, either as a requirement in approval of development or through land allocations within the Island Development Plan, was generally supported but was mindful of the requirements bearing in mind the Island's wealth of other forms of open space and outdoor recreation opportunities, including beaches, playing fields and common land. Support was expressed for the dual use of school facilities rather than the creation of new recreation spaces.
- 1.3.29 Access to and use of open areas should be made available to all irrespective of age and mobility. There was some debate over the means by which to combat possible impacts on visual character and habitat where facilitating development occurs and/or use of an area increases. The concept of protecting and bettering the network of green corridors was supported whilst recognising that the practicality of achieving this may be difficult.

2 Introduction

2.1 The purpose and scope of this report

- 2.1.1 The purpose of this document is to set out the analysis of the responses received from the public to the 2nd stage consultation undertaken as part of the Development Plan Review. This report explains who has been consulted, how they were consulted and provides a summary of the responses received.
- 2.1.2 Consultation with individual States Departments involves technical matters and will be ongoing as the Department progresses with preparing a draft Island Development Plan and does not, therefore, form part of this report.
- 2.1.3 The consultation also included a 'Call for Sites' exercise to give residents, land owners and organisations an opportunity to bring to the Environment Department's attention land parcels within and around the edges of the main and potential local centres, (so fitting with the States' agreed spatial strategy), which may, in principle, be available for development for housing or employment uses. The Department made available to the public specific forms and detailed guidance and explanation in relation to the Call for Sites. Although forming part of the consultation, the responses for the Call for Sites will require more detailed analysis and the results will inform the Strategic Housing Land Availability Study which will be published separately at a later date. The results of the Call for Sites do not therefore form part of this report.

3 Who and how we consulted

3.1 Who we consulted

- 3.1.1 Everyone in Guernsey has had the opportunity to respond to the 2nd Stage public consultation and the key messages, issues and potential options outlined in it. Consultees have been divided into 4 groups as follows:

Group 1: States departments
Public utility providers
Parish constables

Group 2: Government and related agencies and partnerships
Environment, conservation and design bodies
Voluntary sector

Group 3: Private sector bodies
Media

Group 4: Individuals/members of the general public

3.2 How we consulted

- 3.2.1 A summary booklet setting out the key messages and issues and suggesting some possible options designed to stimulate discussion was published on 29th

July 2013 and comments and opinions were invited for a period of seven weeks. The booklet summarised much of the evidence that has been gathered by the Environment Department to date and which underpinned the consultation and gave further information and links to the suite of ten evidence reports where more information or background to any of the key issues or messages raised could be found.

- 3.2.2 During the consultation period the summary booklet, evidence reports and the 'Call for Sites' form and guidance note were available to download from the States' website. Hard copies of the booklet, forms and guidance were also available by post or collection from Sir Charles Frossard House, the Guille-Allez Library and Douzaine Rooms and at the Department's public information sessions (see below).
- 3.2.3 The public consultation and overall plan review process were promoted through a two-page article in the Guernsey Press and through coverage of the consultation on local radio and TV stations.
- 3.2.4 The Forward Planning Team's dedicated Twitter account for the Plan Review, @planreviewgsy, continued to allow members of the public and organisations to receive short, timely updates on Plan Review news and events. Plan Review developments, news and relevant links posted by the Forward Planning Team appear in the Twitter live-feed of anyone who has become a 'Follower.' The account currently has 73 'Followers' of the Plan Review, including Guernsey organisations, media, businesses, States Deputies and members of the public. Information posted via @planreviewgsy has been regularly 'retweeted' (i.e. forwarded) by those Followers, thus spreading the message further and encouraging wider participation.
- 3.2.5 The operation of a Plan Review Twitter account from the start of the Plan Review engagement process has enabled the Environment Department to provide another channel through which to seek the views of the community, particularly those of younger people who may be less likely to contact the Department in writing or visit the States website.
- 3.2.6 During the seven week consultation period a number of events were held to explain the plan review process, the purpose of the consultation, the evidence findings and to encourage participation in discussion on the key messages and issues arising out of the research.
- 3.2.7 The Environment Department has made a number of presentations to and conducted workshops with targeted groups and organisations which has provided excellent opportunities to not only explain the emerging issues and messages but has also provided useful forums for discussion and valuable feedback. Details of the groups involved can be found at Appendix A
- 3.2.8 The Department also hosted a number of informal public information sessions at key locations throughout the Island. This included an exhibition explaining the plan review process and summarising the key messages, issues and potential options outlined in the consultation and also gave the opportunity to explain the call for sites process. Those attending the information sessions had the opportunity to ask questions of Environment Department staff, seek

clarification about the Plan Review and the consultation and to discuss any views and opinions. The details of the information sessions is set out below:

Mon 29 th July	Tue 30 th July	Wed 31 st July	Thurs 1 st August	Fri 2 nd August	Sat 3 rd August
10am-4pm Western Parishes Community Centre (Styx), St Peter's	9am-5.30pm Quayside, Vale	10am-4pm Forest Douzaine Room, Forest	12.30pm-7pm St Matthew's Church Hall, Câtel	9.30am- 2.30pm Fresh Friday, Market Square, St Peter Port	9am-5pm Le Friquet Garden Centre, Câtel
Mon 5 th August	Tue 6 th August	Wed 7 th August	Thurs 8 th August	Fri 9 th August	Sat 10 th August
9.30am-2pm St Martin's Parish Hall, St Martin's	9.30am-5pm St Martin's Parish Hall, St Martin's	9am-5pm Earlswood Garden Centre, Vale	9am-5pm Earlswood Garden Centre, Vale	9.30am- 2.30pm Fresh Friday, Market Square, St Peter Port	10am-5pm Food and Retail Skills Unit, Admiral Park, St Peter Port

3.3 What we consulted on

3.3.1 In some subject areas the Department's research and the responses to the 1st stage of public consultation has provided the required information and the 2nd stage consultation was therefore on those topics where a number of key messages and issues had arisen through the evidence gathering process.

3.3.2 Alongside the summary booklet, the "Key Messages, Issues and Options Consultation", the Department also consulted on a series of evidence reports which the Environment Department has written and which underpinned the summary booklet. The evidence reports are as follows:

- Analysis of Potential Local Centres, June 2013
- Draft Strategic Housing Land Availability Assessment Methodology 2013
- The Use of Planning Covenants in the Delivery of Affordable Housing in Guernsey, November 2012
- Guernsey Employment Land Study 2013
- Retail in the Main Centres, July 2013
- Approach to Agriculture and Redundant Vineries, July 2013
- Guernsey Character Study (Stage 1), June 2013
- Guernsey Conservation Area Study, June 2013
- Sites of Special Significance and other designated Nature Conservation Sites, June 2013
- Open Space and Outdoor Recreation Survey 2013

3.4 Who responded

- 3.4.1 As well as those attending the targeted workshops and presentations (see Appendix A) approximately 530 people attended the various informal public information sessions, with Le Friquet Garden Centre, Castel and Quayside, Vale being the most popular venues.
- 3.4.2 81 people and organisations sent formal responses to the Department, with a total of 443 comments made. Most consultees responded to more than one message, issue or option and the time that people had clearly spent on considering the messages, issues and potential options and setting out their thoughts and ideas in formal responses remains greatly appreciated and is very valuable to the plan review process.

4 Analysis of responses

4.1 Introduction

- 4.1.1 This section takes each principal subject area in turn and summarises the responses received for each of the messages, issues and potential options relating to that area.

4.2 Main & Local Centres

- 4.2.1 The Spatial Strategy of the Strategic Land Use Plan, with which the policies of the Island Development Plan must comply, directs development to within and around the Main Centres of St Peter Port and St Sampson/Vale with some limited development possible within and around the edges of Local Centres, once those have been identified.
- 4.2.2 The main centres of Town and the Bridge have important roles on the Island, contributing significantly to the Island's economy, containing some of the Island's most treasured built and natural environments and are in themselves places for communities to live, work and spend leisure time in. The SLUP makes clear that the Development Plan must ensure that their role as the Island's main centres is not diluted and that they remain attractive and viable commercial, leisure and residential areas.
- 4.2.3 The Strategic Land Use Plan identifies the need to bring together development opportunities within the main centres that can deliver economic, social and environmental benefits, into a single vision to build a picture of how the Main Centres could look, feel and function in the future. Since the 1st stage public consultation, a non governmental Visioning Team has been established comprising a group of volunteers representing a cross section of users of Town and the Bridge. However, at the time of the 2nd stage public consultation, the visions produced by this group were yet to be published and the responses received and analysis in this report does not take account of any subsequently published material in this respect.
- 4.2.4 The Environment Department has formulated a range of sustainability indicators to identify Local Centres. Sustainability indicators are those services and facilities that contribute to an area's ability to meet local social, economic and environmental needs and those used were identified taking into account the responses received to the 1st stage public consultation.
- 4.2.5 Using the sustainability indicators, ten potential Local Centres have been identified. These include the existing Rural Centres identified in the current Rural Area Plan alongside two additional rural Local Centres and three Urban Local Centres as set out in the Analysis of Potential Local Centres evidence report which is available to download from states website at www.gov.gg/planreview.
- 4.2.6 The potential Local Centres are:
- Cobo;
 - Forest;
 - L'Islet;

- St Martin;
- St Peter;
- Trinity Square;
- Longstore;
- The Rohais;
- L'Aumône, and;
- Capelles.

4.2.7 Comments on the approach taken to identifying the potential Local Centres were sought, as were opinions on the services, facilities or other uses that may be needed in the future within any of the potential Local Centres identified.

4.2.8 49 different individuals or organisations provided 74 comments on Main and Local Centres.

Comments received concerning Main Centres

4.2.9 Support was expressed for the Spatial Strategy within the Strategic Land Use Plan, and how it keeps the majority of new development within and around the Main Centres. Respondents differed as to whether development should be contained solely within the Main Centres or more widely distributed around the edges of them.

4.2.10 Concern was expressed at the level of development that might occur at the periphery of the Main Centres and the effect that this might have on green open spaces.

4.2.11 It was advised that to achieve successful overarching regeneration of the Main Centres, the Visions for Town and the Bridge must be developed with maximum flexibility to ensure that any initiatives accord with wider Government policy.

4.2.12 A suggestion was to make Town more tourist-friendly through provision of designer shops, jewellers, boutiques and supporting uses such as cafes and restaurants along with better catering for cruise ship's passengers and those from other visiting boats.

4.2.13 Some respondents suggested that changing the routing of vehicles in Town and the introduction of peripheral parking, perhaps in conjunction with pedestrianisation of the Quay, might contribute towards revitalisation of Town. North Beach was identified as presenting a key redevelopment opportunity with the scope to provide crucial revitalisation of Town through a mix of uses from shopping, food/beverage to tourist/ cruise ship facilities which would help counter the growing online shopping trend and its negative socio-economic impacts. Others hoped that the Vision for Town might include provision of additional parking, perhaps through rented spaces, which might finance further parking, or through creation of basement storeys on the piers. It was considered by some that facilitating parking might safeguard the retail function of St Peter Port. Developing a park and ride system was an alternative suggestion and a means by which to reduce car usage within Town.

4.2.14 Town improvements were also suggested in the form of additional parks, gardens and play spaces.

- 4.2.15 It was considered that the main centre of St.Sampsons/Vale offers an opportunity to accommodate day to day convenience retailing and bulky goods type of retail requiring larger stores of more specialist type such as those supplying white goods, electrical stores, groceries, furniture stores and trade supplies, whilst also providing older peoples' housing, offices, industry and freight facilities. One respondent felt strongly that rejuvenation of the Bridge, through the redevelopment of Leale's Yard, could be achieved through provision of offices, the users of which would then support existing businesses in the centre. One respondent supported the consolidation of freight operations to this centre as this would greatly reduce the need for commercial vehicles to travel along Les Banques.
- 4.2.16 Respondents also felt that access to and between all facilities in the main centres should be available to all, including the disabled and the elderly.
- 4.2.17 Land reclamation at Belle Greve Bay was mooted as an option for providing improved marina berths, defending the coastline from flooding and providing land for development.

Comments received concerning Local Centres

- 4.2.18 Support was shown for potential Local Centres at Cobo, St Martin, L'Islet and Capelles:
- As a Local Centre it was thought that Cobo would work well and could be both focussed (around the coastal node) and linear (extending inland along highways) to encompass all services in the locality. A desire to limit development at the edge of this Local Centre to avoid ribbon or piecemeal development was voiced. It was felt that La Mare de Carteret Schools could accommodate community facilities;
 - St Martin was also considered to work well as a Local Centre but it was thought that it should be focussed around the Church/Parish Hall/Community Centre area. Respondents felt that certain areas may require redevelopment but in general only minimal works should be permitted, on brown field sites or redundant vineries, to avoid making perceived current traffic and road safety problems worse. Additional parking was suggested as a requirement for this potential Local Centre;
 - It was thought that L'Islet would work well as a Local Centre but should extend to the south to encompass the Marks & Spencer retail unit;
 - It was felt that as a Local Centre Capelles may be unsustainable in the long run should development be allowed there without adequate supporting facilities. However it was felt that the area is generally well-equipped. Development of open areas to the south and south west was not desired. Provision of a retirement village was suggested. It was commented that the area lacks safe walking routes and a high quality pedestrian environment.

4.2.19 Concerns were raised regarding designation of Local Centres at L'Aumône, St Peter and Forest:

- It was expressed that L'Aumône lacks facilities and designation as a Local Centre could result in the loss of important green field sites in the area. It was felt that as a Local Centre it may be unsustainable in the long run should development be allowed there without adequate supporting facilities;
- One respondent opposed inclusion of St Peter as a Local Centre – it was argued that it would not add any value to the area, additional retail was not required for sustainability, the area lacks gas and mains drainage services, additional traffic would be generated by development and the existing pedestrian environment is far from ideal. This respondent also considered the areas unsuitable for mass employment and wanted green fields protected from development. Another respondent thought that the Local Centre at St Peter works well but that the impact of the altered Airport Safety Zone in conjunction with development of the runway may be a constraint;
- One respondent thought that Forest only exists as a centre due to the Forest Stores retail unit.

4.2.20 It was felt that potential urban Local Centres at the Rohais, Longstore and Trinity Square were not required:

- The relevance of establishing urban Local Centres was queried with the extent of the Rohais being questioned as was the logic of including the Longstore, where there is no land to develop, without linking that to Admiral Park. It was suggested that Trinity Square should be the subject of different criteria due to its proximity to the Main Centre of St Peter Port.

4.2.21 Additional potential Local Centres were suggested at Vazon, Richmond and Rocquaine:

- The need for a further Local Centre in the west of the Island was mooted;
- Vazon contains a range of the facilities and sustainability indicators used in identifying the other potential Local Centres.

4.2.22 There was general support for the range of services and facilities used as sustainability indicators to identify the potential Local Centres, with emphasis on easy access by a variety of modes of transport. It was commented that facilities should be appropriate and tailored to the demographic using the particular Local Centre. It was suggested that additional sustainability indicators could include a hotel, beach, takeaway, gift shop and short term parking. One respondent thought that some specific key facilities should always be required to make a sustainable local centre, not just any five from the list. The choice of Local Centres should reflect where Islanders 'think' they are above the provision of sustainable facilities.

4.2.23 A range of suggestions were made with regard to the methodology used in identifying the potential Local Centres and it was observed that in spatial

planning it is important to illustrate the context of each site and not to view individual centres as isolated, independent units. Consistency should be demonstrated in identification of the extent of Local Centres, for example in establishing distance from the core.

- 4.2.24 Ranking of Local Centres according to level of provision of services/facilities was suggested, with a view to concentrating development at the larger Local Centres. There was support for improving the role and sustainability of all Local Centres in ways appropriate to each individual centre. Care was advised with regard to an increase in facilities where a centre is already well-catered for at the expense of other areas which are lacking and which should take priority.
- 4.2.25 One respondent felt that the distinction between town and country is becoming increasingly blurred. The solution proposed was to maintain differentiation in policy terms between the two. Conversely, several respondents felt that development in the Local Centres would take pressure away from the Main Centres which have already seen a significant amount of development.
- 4.2.26 Some pointed out that it should be borne in mind that the more comparison retail development permitted in the Local Centres, the greater the detriment to the shops in Town and on the Bridge. As such, respondents favoured development of housing and community facilities, including playing fields and educational facilities, over comparison retail in Local Centres. Small scale employment opportunities were however also desired in order to build thriving sustainable communities without the need to travel to the Main Centres.
- 4.2.27 Parking, safe walking and cycling routes and recreational parks were desired in all Local Centres, as were improvements in access to facilities for the less physically mobile. One respondent highlighted the importance of 'walkability' with regard to Local Centres and the conflict between pedestrians and traffic, particularly the effect of speed limits and the amount of road engineering required to genuinely turn areas into vibrant community centres. One respondent felt that none of the potential Local Centres have a high quality pedestrian environment and some have no safe walking routes to the core.
- 4.2.28 Several respondents felt that development in the more rural Local Centres should only be undertaken if absolutely necessary and then in a way which is sensitive to the surroundings and not on green field land. Flexible options for brown field and viney sites were sought. It was pointed out that many residents of the Local Centres commute to the Main Centres for work and as such provision of further housing in the Local Centres would only add to traffic congestion as people would be likely to continue to work elsewhere.
- 4.2.29 The concept of Community Plans was supported, provided local residents, business owners and employees played a significant role in their formulation.

4.3 Housing

- 4.3.1 The consultation set out the Department's proposed approach to housing land supply, in accordance with the requirements of the Strategic Land Use Plan. The new approach to housing land supply is to identify a five year supply primarily through the 'allocation' of housing sites within and around the Main

Centres. Whilst the majority of the five year supply will be met by allocations, other sites may still come forward as 'windfalls' and contribute to the supply. For the remainder of the Plan period, beyond the first five years, it is intended that appropriate strategic reserves of land for housing ('Broad Areas of Search') will be identified within and around the Main Centres.

- 4.3.2 In order to demonstrate a five year land supply the Environment Department is undertaking a Strategic Housing Land Availability Assessment (SHLAA). The draft methodology for this was published for comment as part of the 2nd stage public consultation. The 'Call for Sites' exercise forms part of this study and will inform the SHLAA the results of which will be published separately at a later date and do not form part of this report.
- 4.3.3 The consultation also focused on the key issue of affordable housing provision in the Island and options of how planning policy might help increase supply through the use of planning covenants. The Department commissioned research into this area and the report entitled 'The Use of Planning Covenants in the Delivery of Affordable Housing in Guernsey, November 2012' was published for further information and is still available to download from the States website at www.gov.gg/planreview.
- 4.3.4 Some responses received conflicted with the approved Spatial Strategy of focussing development within and around the Main Centres with limited development within and around identified Local Centres. These responses are noted but cannot be taken forward for policy consideration.
- 4.3.5 49 different individuals or organisations provided 74 comments on Housing.

How do we make provision for new housing?

- 4.3.6 It was generally agreed that provision of housing is one of the most important issues facing the new Island Development Plan.
- 4.3.7 The switch from relying on unpredictable 'windfall' sites to allocated sites is considered fundamental and is supported. It would provide clarity and certainty to land owners and would be more likely to result in land being brought forward for development. Some respondents felt that the bringing forward and development of the Housing Target Areas, identified in the existing Urban Area Plan, should be a priority to meet the Island's housing requirements going forward. Support was also expressed for continuing to permit house construction on 'windfall' sites (replacement with taller buildings, conversion, subdivision, infill, etc.).
- 4.3.8 It was also considered important that new housing supply target numbers are realistic, soundly based and achievable. Housing needs are intrinsically linked to population control and a trend for upgrade and extension of existing houses has led to a deficiency in smaller, more affordable units. In conjunction with this, one respondent thought that a condition which prevents extensions to dwellings would prevent houses escalating to the next level of the market, out of reach of first time buyers and too large for down-sizers.

- 4.3.9 Some respondents felt that the ability of the Local Centres to accommodate housing, in particular affordable or sheltered housing, should not be overlooked in focussing such development within and round the Main Centres.
- 4.3.10 In identifying sites for housing, the particular requirements of different forms of housing must be taken into account. Housing suitable for older people was thought to be an urgent requirement – retirement villages were suggested – and it was commented that the majority of new housing should be smaller units to accommodate older people, freeing up larger units for larger households. Where this is in and around the Local Centres it would enable people to remain in their Parish whilst being close to facilities and services.
- 4.3.11 Several respondents advocated building on former vineries, particularly in the vicinity of the Local Centres, and particularly for social housing. One respondent commented that this could achieve better developments than large housing estates and would not, due to the length of time glass has been present on these sites, detract from the open countryside. Building housing on redundant industrial sites was also proposed. The Ramee was suggested as a development site in lieu of Belle Greve Vinery. Another respondent was keen to see housing accommodated on land created through reclamation of Belle Greve Bay, Baie de Pulias or Baie de Pecqueries. This was argued to reduce development pressure on the rest of the Island.
- 4.3.12 Respondents also commented that: the scale of replacement dwellings should be commensurate with the unit being replaced; all housing developments should include adequate parking provision and outdoor amenity space; design and construction should be of a high quality and should not be to the detriment of the character of an area; conversion policies should be flexible; any further development of green field land should be resisted in favour of using brown field sites.
- 4.3.13 It was commented that delivery of the housing supply target should be measured by completions, not planning permissions, to enable a ratio to be established by which an estimate can be made of the number of houses which will result from the permissions approved.
- 4.3.14 An observation was made that allocating a five year supply of housing would only work if control by the Environment Department is retained over the release of land and the type of housing that can be built and in this regard the terms ‘sheltered housing’, ‘extra care housing’ and intermediate housing’ should be carefully defined. It was also suggested that the Island Development Plan should identify specific land allocations for the full 10 year plan period rather than for five year time periods.

Strategic Housing Land Availability Assessment (SHLAA)

- 4.3.15 The SHLAA provides an opportunity to consider deliverability constraints including highways issues, multiple-ownership, services issues and previous contamination and to consider potential contributions to the community.
- 4.3.16 Respondents supported the proposed SHLAA process and acknowledged that it is an identification and site assessment tool and, in accordance with the “Draft Strategic Housing Land Availability Assessment Methodology 2013”, should not

be extended to select the preferred allocated sites to be included within the Island Development Plan This could compromise the independence, integrity and impartiality of the SHLAA. Support was voiced for selection of preferred sites through a separate assessment, ranking and consideration against comparative advantages and disadvantages of alternative sites with an explanation of weighting for transparency. It was thought that the SHLAA should be regularly updated for future use.

- 4.3.17 One respondent raised concern that the density figures given as examples in the SHLAA methodology statement relating to housing densities may be unrealistic in Guernsey planning terms , leading to unrealistic expectations from landowners and causing overall negative impact on the development process. Another respondent urged that overcrowding should be avoided.
- 4.3.18 It was requested that within the SHLAA a consideration is made of the amount of potential social housing it might be possible to gain from individual sites.

Call for Sites Process

- 4.3.19 The 2nd stage public consultation also included a 'Call for Sites' exercise to give residents, land owners and organisations an opportunity to bring to the Environment Department's attention land parcels within and around the edges of the main and potential local centres, (so fitting with the States' agreed spatial strategy), which may, in principle, be available for development for housing or employment uses. Although forming part of the consultation, the responses for the Call for Sites will require more detailed analysis and the results will inform the Strategic Housing Land Availability Study which will be published separately at a later date. The results of the Call for Sites do not therefore form part of this report however comments regarding the process involved in the Call for Sites have been analysed.
- 4.3.20 Overall, the 'Call for Sites' was considered a positive process, early engagement with landowners leading to identification of land which might be appropriate for development.
- 4.3.21 Two respondents thought it logical to limit the 'Call for Sites' submission to sites within or around the Main and Local Centres for manageability but thought that the process should be opened up to sites further afield which may have appropriate characteristics and advantages. Others felt that new housing should be located in a sustainable location, close to shops and employment opportunities. It was noted that many sites which may be submitted within the 'Call for Sites' would have poor access and may be better suited to recreational or open spaces rather than housing or employment uses.
- 4.3.22 The requirement that to be eligible for the 'Call for Sites' sites must exceed 0.25 acres or accommodate 5 or more dwellings was questioned but no alternative was put forward for consideration. It was commented that where redundant vineries are thought able to accommodate housing, a percentage limit should be set as to the amount of land to be developed.
- 4.3.23 One respondent did not support the concept of identifying new sites for development through consultation with land owners. An alternative to the 'Call

for Sites' process was proposed: a panel of three neutral individuals should trawl the Island Parish by Parish to identify, within certain parameters, sites suitable for development. It was also suggested that States-owned sites be considered by the Environment Department for development to encourage decisions to be made about the future of such land parcels in order to combat stagnation and sites standing vacant.

How can planning covenants help deliver affordable housing?

- 4.3.24 Use of planning covenants to deliver affordable housing was generally supported, despite respondents anticipating resistance from land owners and developers.
- 4.3.25 It was commented that use of planning covenants is a common development management tool and applicable to a number of circumstances but that it must be ensured that planning policy 'requires' provision of affordable housing for covenants to work. It was considered important that policy adequately details the amount of affordable housing required per development, whether through a size/number threshold or percentage of the total number of units, and the unit sizes and tenure required. Such policy should be well-constructed and unambiguous but should also retain flexibility and should aim to avoid the sub division of sites or piece-meal development by those wishing to avoid the requirement for affordable housing by falling below the given threshold.
- 4.3.26 Release of an existing Housing Target Area was proposed as a means by which to provide affordable housing but this should not be used as a policy template - lessons should be learnt from positive and negative experiences in Jersey and the UK.
- 4.3.27 It was suggested that for developments to deliver affordable housing and remain viable allocated sites would have to accommodate a minimum of 20-30 dwellings. Conversely, one respondent thought that affordable housing would be possible on smaller-scale developments and that alternative strategies should be investigated, such as partnerships enabling self-build. In either case, there was strong support for tenure blindness in design and mixing of locations.
- 4.3.28 Recommendations were made concerning the management and maintenance function of affordable housing in order to control quality and to ensure control of future sales. Respondents felt that proposals for housing schemes should be carefully developed, including early input through the planning process, in order to achieve positive results.
- 4.3.29 Allocation of land for specific purposes has the potential to result in significant uplifts in value for the land owner and it was felt that placing the financial burden of providing affordable housing on developers of future building sites could be unfair. Conversely, another felt that the market would support, over time, any subsequent reduction in gross land value, and would establish a new lower norm for land values once planning covenants become established.
- 4.3.30 One respondent suggested the way to capture the uplift in value for the public good would be through the purchase of land by the States prior to

implementation of a change in zoning. Affordable housing could then be constructed on those sites.

- 4.3.31 Use of appropriately located redundant vinery sites that lie outside the Main or Local Centres was suggested. Some considered that Policy could provide, in exceptional circumstances, for sites for 100% affordable housing, outside the scope of the Spatial Strategy. A percentage of the sale price could be put towards clearance of other redundant glass.
- 4.3.32 The 2nd stage public consultation put forward a number of potential options for consideration and to stimulate thought on possible approaches to increase the supply of affordable housing. These options constituted a 'headline' or overall approach to using planning covenants to delivery affordable housing and below is a summary of the comments received on each option.

Option 1: The same % requirement for affordable housing provision on all housing development schemes over a given threshold size

- 4.3.33 Two respondents supported this option, one with the proviso that the percentage of affordable housing required was set at an appropriate level – it was thought that 20% was too low. It was suggested that planning policy for this option should include a percentage breakdown between social rental and low cost home ownership. It is commented that this would seem to be the least labour intensive option for the Environment Department.
- 4.3.34 Conversely, one respondent did not support this option as it was felt to be inflexible and would not respond to the viability of individual schemes.

Option 2: Vary the requirement between different areas

- 4.3.35 It was thought that this option would encourage developers and land owners to bring sites forward but would require a clearly defined line between Main Centres and outer centres which would be more labour intensive for the Environment Department.
- 4.3.36 There was thought to be some logic in providing for a greater proportion of affordable housing in the rural areas where land value uplift would be greatest but concern that the actual result would be a limited number of homes built due to a lack of opportunity sites of appropriate size in rural areas.
- 4.3.37 One respondent suggested that in some cases this could be put to the public good through purchase of land by the States prior to implementation of a change in zoning. Affordable housing could then be constructed on those sites.

Option 3: Site-by-site approach

- 4.3.38 Option 3 was supported by three respondents. It was suggested that an affordable housing policy could provide a target % requirement on all sites consisting of more than a given number of dwellings, of an agreed mix of styles and types, consistent in terms of design, standards and quality to other housing on the site and subject to occupancy controls so that it remains affordable. Flexibility should allow for alterations to the required contribution depending

on the specifics of the development. This option could give greater flexibility when seeking contributions to open spaces.

- 4.3.39 Two respondents did not support this option. It was considered the most labour intensive and time consuming option from a planning perspective and would not provide a clear objective playing field for developers. It could attract appeals and there was a risk that a single developer would repeatedly create small scale developments, below the threshold size, avoiding the need to include affordable housing.
- 4.3.40 Planning covenants need to be clear and upfront to give all parties an indication of development viability.

Option 4: Staircase approach

- 4.3.41 Whilst it may give greater clarity to developers it was thought that this option would result in a rush for development which could destabilise the local market. The reality was felt to be that the process would be too complicated and the outcome would reduce the overall amount of affordable housing provided.

Option 5: Allocating sites for general market housing and affordable housing separately

- 4.3.42 Two respondents supported this option, one did not.
- 4.3.43 It was thought to be suited to those with more than one small site or larger sites which could be subdivided which could push developers towards affordable housing through restricting the amount of land available for general market housing.
- 4.3.44 It was noted that social integration could be compromised if not managed appropriately and could entail controversial decisions as to which sites are best suited to which tenure due to the relative value of each.

4.4 Employment

- 4.4.1 A core objective of the Strategic Land Use Plan is to support, through planning policies, a diversified, broadly based economy, with high levels of employment and a flexible labour market. The SLUP stipulates that the Development Plan will make provision for a comprehensive range of land opportunities for employment uses.
- 4.4.2 Building on previous consultations and research, the Environment Department considered that, at this stage in the Plan Review, adequate information and clear messages had been obtained regarding certain sectors of the economy, including tourism, and therefore did not include those sectors as part of the 2nd stage public consultation. The public consultation did however focus on key messages and issues which had emerged relating to the following sectors:
- Offices, industry and storage/distribution
 - Retail
 - Agriculture and redundant vineries

- 4.4.3 A background and summary of the feedback received for each of these sectors is set out below in turn.
- 4.4.4 52 different individuals or organisations provided 114 comments on Employment.

Offices, Industry, Storage and Distribution

- 4.4.5 The Strategic Land Use Plan requires the Island Development Plan to assess existing reserves of business land supply against the Island's current and longer term economic development needs, including the needs of the lower value industrial and service sector, and to investigate appropriate mechanisms for securing an adequate supply of such land.
- 4.4.6 To assess existing reserves of land and test whether these are adequate for the future, the Environment Department is undertaking an Employment Land Study considering Industry, Offices and Storage and Distribution uses. The study is in three stages and two stages are now complete which have identified what land in industrial, office or storage and distribution use we have on the Island at present and creates a picture of future land and premises requirements for these sectors. The first two stages of the study are available to download from the State's website at www.gov.gg/planreview.
- 4.4.7 The 2nd stage public consultation made reference to the findings of the Guernsey Employment Land Study 2013 and posed key questions about the potential future use of employment sites likely to become obsolete in the future and what type of sites might be suitable for new offices and storage and distribution uses. Possible options that the Department could take into consideration in tackling these issues and accommodating these sectors were set out in the consultation booklet to stimulate thought and discussion.

Comments on offices, industry and storage/distribution

- 4.4.8 There was general agreement that industrial and storage sites should be combined and consolidated, perhaps including accommodating smaller entrepreneurial businesses within the larger units vacated as a result of the removal of Low Value Consignment Relief (LVCR).
- 4.4.9 Many businesses could not afford the high rents charged at larger industrial parks and the creation of low cost industrial parks was suggested. It was recognised that Policy SLP4 of the Strategic Land Use Plan gives the potential to provide small businesses with an opportunity to establish outside the Main and Local Centres. It was commented by one respondent that a deficit of low-value industrial premises has been historically demonstrated which has been inadequately resolved through development of brown field sites. However, care is advised when providing for small scale industry outside the Main and Local Centres, in particular due to the effect this can have on traffic and neighbour amenity.
- 4.4.10 In a similar vein, it was commented that storage does not need to be located within or around the Main or Local Centres due to the small number of staff movements generated. Storage of high value transportable items, such as

antiques, bullion, etc. in close proximity to the Airport, or storage of vintage vehicles, was suggested as a new industry for the Island and one respondent proposed the use of disused, drained, quarries to accommodate open or covered builders' and/or storage buildings and yards.

- 4.4.11 A suggestion was made that surplus industrial premises/land could be given over to residential or community developments but not to retail due to the potential effect on existing retail centres.
- 4.4.12 Regarding office accommodation, it was felt that a focus should be given to provision of new sites and redevelopment of existing sites within the Main Centres, supported by a variety of transport options, including parking provision beneath any new developments. Observations were made that older office stock in Town has been vacated in favour of newer offices. The redundant offices should be converted to residential accommodation for those wishing to live and work in Town.
- 4.4.13 Respondents raised concerns over the visual, infrastructure and amenity impacts of further office development at Admiral Park and one respondent opposed large scale office development in waterfront locations. A response queried the accuracy of data and questioned whether an increase in requirements for office space existed at all.
- 4.4.14 An alternative location proposed for office development was Les Caches Business Park, St Martin's, but it was also felt that office development within or around the Local Centres could increase traffic and have an inappropriate urbanising effect.
- 4.4.15 There was support for encouraging development of offices at Leale's Yard, St Sampson which, it was thought, could contribute to the wider regeneration of the Bridge, to the benefit of existing services.
- 4.4.16 One respondent encouraged facilitation of home working.
- 4.4.17 It was commented that the suggested 'flexible approach' to historic buildings, island wide, must be taken on with great care.
- 4.4.18 Some respondents thought that the number and inflexibility of use classes prohibits optimal use of land and buildings, both as offices and industrial premises, and is a disincentive to investment. Policies must be able to accommodate and respond to the rapid market changes typical of employment industries. This would facilitate innovation and entrepreneurship.
- 4.4.19 A trend is noted for change of use of land used for heavy industry to light industrial uses and archiving resulting in a lack of premises for heavy industrial processes subsequently impacting on local training and so local traders. Existing industrial land should be preserved for future industrial use.
- 4.4.20 Investment in high quality infrastructure, including fibre optic broadband, could benefit many employment uses, including offices, home workers and entrepreneurial businesses. It was suggested that funding for public realm improvements, community facilities and infrastructure could be obtained from developers.

Retail

- 4.4.21 Direction is provided within the Strategic Land Use Plan concerning the location of new retail development. This requires provision for large floor plate comparison retail development in the Main Centres whilst ensuring that Town is maintained as the primary retail centre. The Island Development Plan should assess the retail cores of Town and the Bridge to determine whether they need to be redefined in order to concentrate effectiveness and thereby enhance the vitality and viability of the Main Centres. A limited amount of convenience retail may be acceptable in Local Centres where this sustains and enhances their roles as sustainable local settlements.
- 4.4.22 The public consultation set out a number of potential options for discussion regarding assessment of the retail cores and the provision of retail facilities in the Main Centres. :
- Option 1 – Identify a prime retail core which would be protected through policies with targeted areas for retail expansion, including larger floor plate retail units, if and when required, in both Town and the Bridge main centres;
 - Option 2: Identify a prime retail core which would be protected through policies and allow for expansion of the core into an identified secondary retail area for Town and the Bridge, and;
 - Option 3: Provide a wider mixed-use central area with no identified retail core or area of retail protection, encompassing all the existing town centre uses of retail, services and facilities such as bars and restaurants and employment uses.
- 4.4.23 The above potential options are set out in greater detail in the evidence report, 'Retail in the Main Centres' which is available to download from the States website at www/gov.gg/planreview.

Comments on assessment of retail cores and provision of retail facilities

- 4.4.24 There was overall support for protecting the retail element of the Island's two Main Centres.
- 4.4.25 It was thought that integration of various elements of each of the three proposed options – identification of a retail core with expansion areas towards the north along with a flexible wider secondary retail area – would deliver the most effective and comprehensive retail solution for St Peter Port.
- 4.4.26 It was advised that Guernsey should learn from proposals for retail areas in other jurisdictions, such as facilitating the change of use from retail to residential, or office to retail, to revitalise town centres. The policy approach should be flexible and streamlined so that use classes do not hinder new businesses and should protect the core retail area around the High Street in Town. Facilitation of improved disabled access around Town and its shops was supported and it was thought that a better balance should be struck between accessibility and conservation. Some respondents thought that the regeneration of Le Bordage, St Peter Port, would assist revitalisation of Mill

Street through creation of a circular shopping route. Care should be taken when considering policies which impact upon the regeneration of St Peter Port that they do not conflict with the aim of Guernsey Ports Masterplan.

- 4.4.27 It was felt that the Bridge is in limbo pending development (or otherwise) of Leale's Yard, but that the existing shops, despite there being a high number of charity shops, provide a range of goods and attract a large customer footfall. Retail development here could provide modern, level, accessible shopping opportunities although it is recognised that this could detract from the offer of Town. Conversely, two respondents felt that the best option for the Bridge including Leale's Yard would be to resist further retail development with one suggesting that lower cost, larger stores, perhaps builder's merchants, could be focussed in that location.
- 4.4.28 In order to support the viability and vitality of the Main Centres, it was considered that service industries, including estate agencies, must not proliferate over retail uses within the retail cores; conversion of industrial premises to retail should be resisted and policy should control the number of petrol stations and convenience stores across the Island. Going forward, artisan retail units should be supported, encouraging entrepreneurial activity and keeping revenue in the Island and the Slaughterhouse and North Beach sites in St Peter Port were considered to offer an opportunity for retail development.
- 4.4.29 Internet shopping was seen by the majority as a threat to high street retail however one respondent thought that internet shopping should be promoted in tandem with the evolution of St Peter Port and that the two could co-exist. It was suggested that tax incentives could be used to accommodate start-up businesses in vacant buildings, particularly those on the outskirts of Town. Paid parking could have a detrimental impact on retail business. However it was considered that retailers could self-promote through group advertising and local internet sales and deliveries.
- 4.4.30 Two respondents thought that potential Local Centres were already well catered for in terms of retail facilities. Retail development outside the Main Centres could be to the detriment of those centres and should be avoided without careful consideration of the effect on the Main Centres.
- 4.4.31 One respondent raised questions concerning the assumption of population growth in calculating future retail requirements despite the States agreeing a population cap.
- 4.4.32 In relation to the proposed options for retail cores, the response level was low and the opinions were mixed with no clear preference indicated for any particular option. In general, protection and enhancement of retail uses within the Main Centres was generally supported and should not to be detracted from by retail development outside the Main Centres including within or around the Local Centres. Caution was also expressed over the need for provision of large floor plate shops given Guernsey's limited population. A summary of the responses to each option are set out below in turn.

Option 1: Identify a prime retail core with targeted areas for retail expansion, if and when required, in both Town and the Bridge main centres

- 4.4.33 3 different individuals or organisations provided 5 responses to this option.
- 4.4.34 One respondent considered that the policy approach of this option was correct but would be better applied to the areas identified as secondary areas in option 2 rather than those areas shown in option 1. Another felt that this was the most appropriate of the three options providing that St Peter Port remains the primary centre with the Bridge catering for day to day needs rather than functioning as a main retail centre.
- 4.4.35 In particular reference to the targeted areas for expansion under this option, it was suggested that those with restricted mobility would be unlikely to make use of an anchor store based at the Sunken Gardens (due to difficult physical connections with the rest of Town. An extension of the St Peter Port retail core toward the south would provide level access between units, parking and buses.

Option 2: Identify a prime retail core and secondary retail area for Town and the Bridge

- 4.4.36 2 different individuals or organisations provided 2 responses to this option.
- 4.4.37 One respondent favoured Option 2 as this option and its boundaries in their opinion would best protect and enhance the vitality and viability of retail within the prime retail core of Town. Another favoured the areas indicated as potential secondary retail areas in this option but in conjunction with the policy approach of Option 1, as stated above.

Option 3: Mixed-use central area with no identified retail core encompassing all the existing town centre uses of retail, services and facilities such as bars and restaurants and employment uses

- 4.4.38 1 response was received to this option.
- 4.4.39 It was thought that this option would provide the greatest flexibility to develop a vibrant town centre environments.

Agriculture and Redundant Vineries

- 4.4.40 In promoting a viable commercial agricultural industry, the Strategic Land Use Plan requires identification and maintenance of the Island's most important areas of agricultural land for that purpose while also allowing other objectives of the States by supporting physical development and other open land uses, where appropriate, which are considered compatible with the agreed spatial strategy. The Island Development Plan should put policies in place that enable large areas of contiguous agricultural land and other areas well related to established agricultural operations and identified as being of value to the industry, to be protected for agricultural use. Feedback was sought via the public consultation on the research undertaken by the Department and the

approach taken to establish a picture of current agricultural operations on the Island and location of large areas of contiguous agricultural land.

- 4.4.41 The consultation also focused on the key issues of the declining horticultural industry and increasing legacy of redundant vinery sites. Information was presented on the current nature, scale and location of these sites and options put forward for comment regarding their possible future uses, taking account of the limitations for future use set out in the SLUP. This subject was the area which attracted most comments and the widest range of views in the public consultation.
- 4.4.42 Further information and evidence informing the approach to both commercial agriculture and redundant vineries is set out in the Approach to Agriculture and Redundant Vineries evidence report which is available to download from the State's website at www.gov.gg/planreview.

Comments on approach to agriculture and identification of commercial agricultural land

- 4.4.43 It was felt that the new Development Plan represents an opportunity to improve current designations to protect agricultural land.
- 4.4.44 Support was expressed for retention of viable farming land, agricultural and horticultural, thus retaining it as an unspoilt feature of the landscape, providing visual access to open space, and as a valuable asset for the cultivation of crops. This is considered equally important in both rural and more built up settings. The importance of trees and traditional field boundaries was stressed.
- 4.4.45 Respondents raised concerns regarding the impact on the use and value of agricultural land as a result of the keeping of horses and specifically the impacts on commercial agriculture. New commercial crops should be encouraged, whether under glass which remains viable, or in open fields.
- 4.4.46 In relation to the distribution of the larger tracts of commercial agricultural land presented in the Environment Departments research it was felt that the importance of agricultural land in the north of the Island should not be underestimated. The point was made that small parcels of land can remain useful for agricultural purposes and that incorporation within curtilages should not be made too easy. There was concern regarding the impact of fragmentation of agricultural land and the planting of trees, both of which can impact on viability.
- 4.4.47 One respondent suggested that Guernsey adopt the rules of Jersey concerning use of agricultural land, namely that a distinction is drawn between use of fields for agricultural purposes and for 'tree lined lawns' or to accommodate horses.

Comments on identification of redundant vineries and approach to future uses

- 4.4.48 The value of sustainably located redundant vinery sites and the important contribution they can make to achievement of the objectives of the Island Development Plan were recognised.

- 4.4.49 Many respondents supported the return of redundant vineries in open countryside to agricultural land or for open community uses, such as allotments, and as wildlife habitat. A minority thought that inclusion of smaller areas of redundant horticultural land within curtilages should be encouraged provided reversion to agricultural land was possible.
- 4.4.50 Two respondents commented that the age of many redundant vineries – a significant proportion exceed 30 years in age and many are older – means that their built form has been present for a substantial time and that therefore development for other uses would not detract from the openness of the countryside, with older vineries therefore being brought forward the soonest. Such sites are often contaminated by chemicals and glass and, it is argued, could not be considered valuable to agriculture.
- 4.4.51 It was thought that flexibility should be applied in identifying redundant vinery sites within and around the Main and Local Centres for development whether for housing or for small scale employment uses.
- 4.4.52 One respondent felt that, in order to prevent significant financial gain for a few landowners, redundant vineries should only be developed for housing by the States or by the Guernsey Housing Association. Development of redundant vineries for housing should be carefully planned so as to provide adequate amenity space for residents.
- 4.4.53 One respondent proposed a policy approach comprising two tiers of redundant vineries: sites in the open countryside and sites located sustainably within or adjacent to settlements and well-related to surrounding built uses. It was suggested that the former are returned to agriculture/open space and the latter developed for mixed uses including housing. No reference was made concerning proximity to a potential Local Centre.
- 4.4.54 There was support for release, in exceptional cases, outside the Main and Local Centres, of appropriate redundant vineries for small scale businesses – offices, light industrial units, storage yards – or for renewable energy, through grading of sites to identify those most suitable for such uses. It was suggested that cheap, small units on short term leases are required to accommodate start-up businesses – a flexible approach is necessary. It was commented that these sites should be sensitively located but should not be subject to expensive design and landscaping requirements.
- 4.4.55 Several comments suggested that exception sites outside the Main and Local Centres could provide an opportunity for housing development where these relate well to existing built form and are in sustainable locations. A specific land allocation or ‘exceptions policy’ could provide a mechanism for release of such sites, perhaps in conjunction with small scale business use. It was thought that failure to develop such sites would be a wasted opportunity.
- 4.4.56 One respondent opposed development of any redundant vineries, including as exception sites, whilst another felt that history has proved that development of brown field sites will not furnish a solution to a deficit of low value industrial sites with the implication that green field sites may have to be released. Conversely, another respondent thought that the proposed approach should be

broadened to all vineries, not only those which have become redundant, in order to provide 'an exit strategy' to business.

- 4.4.57 It was felt that there is currently no incentive to clear redundant vineries but that granting permission for a small amount of development per vinery, for example construction of a dwelling, might generate adequate equity to finance removal of remaining glass, although time scales for clearance should be imposed. A variation would be to spread the profit accrued from wholesale development of a vinery to clear structures from other sites or to improve off-site infrastructure provision. Financial incentives could be offered for glass clearance on the condition that no development would be considered for a minimum of, e.g. 50 years and that there would be no presumption for development after that time. It was thought that these options could be controlled through covenants and taxation to deter profiteering.
- 4.4.58 Respondents suggested that taxation could be used to encourage clearance and that a States-run subsidy could facilitate clearance of larger sites best suited to reversion to agricultural use. However, another respondent felt that the States should not provide financial aid toward the clearance of glass and others suggested that the non-specialised element of clearance work could be carried out by benefit claimants and prisoners as per the previous States' programme.
- 4.4.59 Several respondents opposed enabling development on any redundant vineries where this would be rewarding dereliction and thought it would be particularly unfair to those who have gone to the expense and effort to clear their own glass. It was, conversely, commented that there will always be winners and losers and that this is unavoidable.
- 4.4.60 One respondent placed the onus for resolving the problem of redundant vineries on the planning system and hoped that the process could be accelerated given the small number of redundant vineries identified. Conversely, another respondent recognised that the future of redundant vineries is a matter for forward strategic planning by the States as a whole, not merely a land planning issue.

4.5 Natural & Built Environment

- 4.5.1 The Strategic Land Use Plan requires the Island Development Plan to provide an overall analysis of the Island's landscape character and to identify priority areas for the enhancement and/or restoration of that character and circumstances where change can be accommodated without significant adverse impact. Through the preparation of the Island Development Plan the Environment Department will provide measures to maintain biodiversity through the protection and enhancement of key habitats and landscapes.
- 4.5.2 In the 1st stage public consultation, the Environment Department proposed a two stage approach to the study and there was general support for the approach. Stage 1 of the Guernsey Character Study which provides a broad outline assessment that strategically studies the whole of the Island, is now complete and, along with the Guernsey Conservation Area Study, has formed

part of the 2nd stage public consultation. Details of both reports are available to download from the State's website at www.gov.gg/planreview.

What are some options for approaching conservation area designation in the Island Development Plan?

- 4.5.3 3 individuals or organisations provided 3 responses to this question.
- 4.5.4 Generally the first stage of the Guernsey Character Study was commended and it was thought that this should set the standard through which Conservation Areas and Sites of Special Significance are selected. However remarks were made concerning the methodology employed in developing the Guernsey Character Study and it was thought that the document contains many assumptions and inaccuracies.
- 4.5.5 One respondent felt that the existing Sites of Nature Conservation Importance/Interest and Conservation Areas in the current Development Plans should be retained and extended.
- 4.5.6 It was advised that the number, size, location and detailed boundaries of individual Conservation Areas should be judged on the merits of the individual areas.
- 4.5.7 Some respondents felt that it was important to include sufficient control within any new policies to ensure that the impact of development on character and appearance of a Conservation Area may be taken into account. The setting of the Conservation Area is of equal importance as the area itself.
- 4.5.8 The use of full character appraisals for individual Conservation Areas, but in greater depth than demonstrated within the consultation documents, is supported and it was recommended that these, and any management plan for the areas, are formulated following adoption of the Island Development Plan.
- 4.5.9 However respondents felt it was important that Conservation Areas, and policy protection of them, should only be designated where it was appropriate to do so and it was acknowledged that in some cases other policies, for example relating to Sites of Special Significance or protecting areas of high landscape value, may be a more appropriate route for managing the character of that place.
- 4.5.10 It was thought that additional areas or clusters of buildings may emerge from the Protected Buildings Review and that these should also be considered for Conservation Area designation.

The need to gauge what is considered special in terms of architectural and historic interest in Guernsey

- 4.5.11 2 individuals or organisations provided 2 responses to this message.
- 4.5.12 The Island is generally special due to its unique built heritage and the expression of past society which is intrinsic in that. Sense of place and continuity, appearance and pattern of historic development and the interest and charm of these settlements all contribute. Support for this approach was

expressed with protection and maintenance of special features considered key. Particular reference was made to abreuveurs and fontaines.

- 4.5.13 An underlying problem is considered to be a lack of commitment to treating the Island as a whole as worthy of a conservation-minded policy.
- 4.5.14 Within the 2nd stage public consultation three options were suggested to help gauge community opinion about the approach to identifying those areas which are special to Guernsey and what level of protection is appropriate. A conservation area character appraisal is essential for each area designated in order that policies are proportionate, robust and defensible and to effectively manage new development in that area.

Option 1: No change – Retain current 90+ designated conservation areas

- 4.5.15 1 individual or organisation provided a response and was in support of this option.
- 4.5.16 It was felt that the Conservation Area status would not be devalued by retaining all existing Conservation Areas. The respondent observed that most have modern development amongst older buildings and that this has been halted since designation.
- 4.5.17 Character appraisals, names, guidance and management plans were considered unnecessary extra work and use of resources. It might be preferable, if required, to enlist a local interest group to undertake the work, at a reasonable cost.

Option 2: Reduce the number of conservation areas and increase their value by merger, extension, retention and some carefully targeted removal

- 4.5.18 4 individuals or organisations provided 5 responses to this option.
- 4.5.19 All four respondents supported Option 2, two with deletion of the reference to 'careful removal'.
- 4.5.20 It was commented that Conservation Areas should be protected from development. Concerns were raised that larger Conservation Areas might dilute the protection afforded to special features and therefore the importance of strong policies was stressed to ensure this does not happen. Flexibility to add to and consolidate Conservation Areas was seen as positive.
- 4.5.21 One respondent sought a commitment within the Island Development Plan to also protect other groups of old buildings in a similar spirit. The same respondent was worried that an increase in the areas covered by Conservation Areas was noted within the consultation document as a negative point.

Option 3: Designate only those areas of outstanding architectural and historic interest as conservation areas

- 4.5.22 3 individuals or organisations provided 3 responses to this option.

- 4.5.23 Option 3 was the least favoured option.
- 4.5.24 It was noted that the map provided within the consultation material appears to indicate removal of Town, King's Mills, etc. and retention of the smaller Conservation Areas. [The legend of this map was incorrectly labelled within the documentation.]
- 4.5.25 One respondent raised concerns over the design of some recent development in St Peter Port and hoped that policy controls would prevent inappropriate development in the future.

How can we identify all the sites that might be worthy of SSS designation?

- 4.5.26 As part of the formulation of a new Island Development Plan the Environment Department will carry out surveys and will make recommendations as to what areas warrant statutory protection as Site of Special Significance within the new Plan. The evidence report Sites of Special Significance and other designated Nature Conservation Sites is relevant and is available to download from the State's website at www.gov.gg/planreview.
- 4.5.27 4 individuals or organisations provided 4 responses to this question.
- 4.5.28 The approach to designation of Sites of Special Significance was welcomed and it was thought that this should set the standard through which selections are made.
- 4.5.29 It was considered that protection of a special site should always be preferable to off-setting. Designations should be made based on the content of the site and not on its character; otherwise important sites could be missed. Respondents felt that there should be no reduction in the level of protection afforded in the existing Development Plans.
- 4.5.30 Belle Greve Bay, including La Salerie and extending to the low water line, was suggested as a site for designation due to its unique and continuous stretch of intertidal habitat and features of special interest, including geological, biological and ornithological and aesthetic.

How can we ensure new development has minimal impact on biodiversity?

- 4.5.31 1 individual or organisation provided 1 response to this question.
- 4.5.32 This respondent suggested that protection of sites could be easier to enforce where the use and boundaries are clearly defined.

General comments on approach to Natural & Built Environment

- 4.5.33 11 individuals or organisations provided 14 general comments.
- 4.5.34 Protection of the rural character of particular parishes was supported with some commenting that any amenities required could be easily accessed in the more developed areas so that development was not justified. Several areas were proposed for designation as/inclusion within Conservation Areas.

Respondents valued existing field boundaries in their various guises, both as wildlife habitats and for their historic status. Introduction of Design Guidance Notes was thought to be beneficial in preserving the rural nature of the country parishes. Defining the different nature of parts of Guernsey by character area was supported.

- 4.5.35 Protection of the architectural character of St Peter Port was also considered important and it was felt that this could be achieved through careful design whilst also accommodating larger floor plate uses behind historic frontages.
- 4.5.36 Care should also be taken to protect the many individual buildings and small groups of buildings which stand outside designated Conservation Areas which also contribute to the character of Guernsey. The approach of requiring new development to reflect the character of surrounding development was considered inappropriate due to a frequent lack of a high quality of neighbouring design. Creep of urbanisation must be tightly managed and removal of unauthorised developments strictly enforced where these are to the detriment of an area, irrespective of whether the area lies within a conservation area designation.
- 4.5.37 One respondent argued that, contrary to a statement in the consultation documents, Conservation Areas have not evolved through a piecemeal process when taking the planning history into account. Reference was made to the Land Use Consultants report “A Strategy for the Conservation and Enhancement of Guernsey’s Rural Environment” the recommendations of which, including those concerning built heritage, were translated into policies within the Rural Area Plan.
- 4.5.38 That respondent observed a relationship between the current Conservation Areas and groups of buildings shown on the 1787 Duke of Richmond map. Previous proposals to reduce the number of designated Conservation Areas have been resisted and deletion of any must be justified. Permitting inappropriate development within Conservation Areas can incrementally damage those areas and devalue the elements which led to their designation.
- 4.5.39 Conversely, another respondent felt that a flexible approach should be taken to historic buildings, in order to utilise them fully, recognising the high cost of their development and improvement.
- 4.5.40 It was commented that the three options in the consultation relating to the designation of Conservation Areas require significant consultation and that it seems unlikely that any individual option would be acceptable in its current form. The amount of work to be undertaken would benefit from the formation of working groups to share resources – offers were made in this regard.

4.6 Open Spaces & Outdoor Recreation

- 4.6.1 Provision of good quality and accessible public open spaces and outdoor recreational facilities can contribute to healthy and active lifestyles but there can be potentially conflicts between these uses and the protection of habitat and/or landscape and countryside. Land must be carefully managed so that it

can operate at the height of, and not beyond, it's potential where it is desirable to do so. Visual access to open space (i.e. the ability to see beyond the frontage development) is identified in the SLUP as being as of equal importance to physical access.

- 4.6.2 Through its research, the Environment Department identified five potential issues relating to different elements of open space and outdoor recreation. Six options were put forward for consideration and discussion as part of the consultation exercise and the responses to each issue and option are set out below. The Open Space and Outdoor Recreation Survey 2013 is relevant and available to download from the State's website at www.gov.gg/planreview.

How can we enhance visual access to open space?

- 4.6.3 4 different individuals or organisations provided 6 responses to this question.
- 4.6.4 There was general consensus that open views contribute to well-being and should be protected. Specific mention was made of the cliffs, the coast (though removal or relocation of recycling facilities was considered necessary), open water, Town's maritime setting and to the area around Capelles.
- 4.6.5 The high value of gaps which remain between existing development, particularly in more built up areas, was observed. It was identified that removal of hedges, specifically Leylandii which are dense and have a tendency to grow out of control, can contribute to opening up of views of the open countryside and of distant landmarks.
- 4.6.6 It was commented that the new Development Plan policies should also protect the individual's right to a view.

Option 1: The Island Development Plan could provide for demolition of ribbon development and for replacement buildings on other sites

- 4.6.7 6 different individuals or organisations provided 6 responses to this option.
- 4.6.8 The majority felt strongly that this option was unrealistic and that in terms of the current economic climate such large scale mistakes as the Island's 20th Century ribbon development should be learnt from rather than physically corrected.
- 4.6.9 It was thought that in approving new developments, whether publicly or privately funded, care should be taken with regard to visual impact on open spaces.
- 4.6.10 One respondent suggested that while this option would be hard to realise, it could still be allowed for within policy.

How can we address the deficiency in play space, and do we need to?

- 4.6.11 8 different individuals or organisations provided 8 responses to this question.
- 4.6.12 Some respondents felt that provision of additional play spaces would have a positive impact, promoting activity and good health and reducing vandalism

and poor behaviour. These should be located within a reasonable distance of existing conveniences and the provision of associated facilities should be kept to a minimum to encourage family interaction and to prevent creep of urbanisation.

- 4.6.13 Provision of additional parks and/or play spaces with parking facilities to enable use by all age groups was suggested, in particular within the Main Centres and near the larger potential Local Centres. Specific sites were suggested in St Martin's potential Local Centre.
- 4.6.14 Conversely, some respondents felt that there was no need for additional play spaces given the number of other types of open space which can be easily accessed. Use of agricultural land for sport and recreational facilities was opposed.

Option 2a: The Island Development Plan could require new housing or community developments over a certain size to illustrate provision of outdoor play space within a reasonable proximity

- 4.6.15 4 different individuals or organisations provided 4 responses to this option.
- 4.6.16 This option was supported by respondents.
- 4.6.17 It was suggested that play spaces should be included within comprehensive redevelopment of larger sites. Where this is a former vinery a minimum of 35% was proposed to comprise tree planting, play space, etc. The use of planning covenants was mooted by one respondent to ensure incorporation of play space or green space, in particular in already densely developed areas with poor access to open spaces.

Option 2b: The Island Development Plan could identify areas of potential play space where there is a lack of provision

- 4.6.18 1 different individual or organisation provided 1 response to this option.
- 4.6.19 Specific sites were suggested in St Martin's potential Local Centre.

How can we improve accessibility to open space for the aging population?

- 4.6.20 The Island Development Plan could encourage provision of associated facilities and upgrade of physical access to make open spaces and outdoor recreation areas more attractive and accessible to more users
- 4.6.21 5 different individuals or organisations provided 6 responses to this question and option.
- 4.6.22 It was suggested that an optimum time to review and improve accessibility could be when an area is being refurbished but in the shorter term provision of facilities, e.g. toilets, suitable parking, access for those using mobility vehicles, could better accommodate this identified demographic. Access to and use of open areas should be available to all. Seating areas were proposed.

- 4.6.23 A more detailed study, perhaps jointly commissioned by the Environment and Commerce and Employment Departments was suggested by one organisation. It was proposed that this could go beyond a visual assessment of basic access issues and include awareness of visual and other impairments. It was advised that other jurisdictions have recognised the need and value of making improvements in accessibility and have, often through relatively inexpensive measures, improved access to beaches, parks, historic sites, open land and indeed retail areas. Norfolk and the Isles of Scilly were cited as examples.

How can we enhance provision of green corridors?

- 4.6.24 5 different individuals or organisations provided 5 responses to this question.
- 4.6.25 The value of Guernsey's green lanes and ruelle tranquilles was appreciated, in particular with regard to increases in the Island's motor traffic, and the concept of protecting and bettering the network was supported whilst recognising that the practicality of achieving this may be difficult. A mandatory, rather than advisory, 15mph speed limit was suggested.
- 4.6.26 Creation of safe walking/cycling routes along the inside of field boundaries, as has already been done in several locations, was suggested by two respondents. Shared use of surfaces should be possible if users can be considerate of one another. Links could be made between local schools and facilities.
- 4.6.27 It was suggested that improvements could be undertaken by individual Parishes with central government support to reduce possible conflicts.
- 4.6.28 The Island Development Plan could provide an identified and linked network of green corridors by restricting some forms of development on identified routes between open spaces and areas of outdoor recreation
- 4.6.29 4 different individuals or organisations provided 4 responses to this option.
- 4.6.30 There was support for this option.
- 4.6.31 A long term plan was suggested to provide a better network of cycle tracks and footpaths in both rural and urban areas and that these, if appropriately surfaced, could accommodate mobility vehicles and so provide access for the disabled and elderly. It was thought that this would also improve traffic congestion through removal of cyclists from the main highway and encouraging use of modes of transport other than the car.
- 4.6.32 It was regretted that the Ruettes Tranquilles project was discontinued.

How can we encourage the provision of allotments?

- 4.6.33 The Island Development Plan could encourage the use of land for allotments by allowing for provision of associated facilities
- 4.6.34 4 different individuals or organisations provided 5 responses to this question.

- 4.6.35 It was thought that there is a need for more allotments and for the Island to be more self-sufficient. A policy of permitting allotments on suitable sites was supported with redundant vineries cited as able to accommodate such a use.
- 4.6.36 Provision of open green space in conjunction with allotments was proposed, which would provide valued outdoor activity areas for all the family with the benefit of being able to return easily to agriculture. One respondent suggested the use of planning covenants in achieving provision of allotments.
- 4.6.37 It was felt that allotments sites, including associated structures, would represent a visual improvement over derelict vineries and that the untidy appearance of allotments should not be a concern.

General comments on approach to Open Spaces & Outdoor Recreation

- 4.6.38 21 different individuals or organisations provided 28 general comments.
- 4.6.39 Protection of green spaces and recreational facilities was considered important. Particular reference was made to cliffs, beaches and playing fields.
- 4.6.40 Several respondents felt that existing facilities and access should be maintained and improved whilst also protecting the environment. Some were resistant to any development at beaches where facilities do not already exist.
- 4.6.41 One respondent commented that viewing over-use of sites and detriment to character as a result of opening up accessibility as a disadvantage was irrational and discriminatory towards less-mobile members of the population. It was felt that innovative and sensitive ways of improving access, including provision of facilities, need not have a detrimental effect on character and that conservation and accessibility should be given equal consideration.
- 4.6.42 Respondents suggested that policies should protect open spaces with increased emphasis placed on visual spaces, habitat, parish playing fields, landscape and the unique maritime setting of Town.
- 4.6.43 It was felt that there is potential to redress the balance between car parking and open green spaces within the Main Centres. This could open up use of the piers and provide parks, gardens and play spaces and could equally apply to the potential Local Centres where better use could be made of redundant vineries in this respect.
- 4.6.44 Desired uses included publicly accessible woodland, a golf course, allotments, playing fields, space for equestrian pursuits and a country park with leisure facilities including, walks, riding, etc. Protection of La Vallette bathing pools was mentioned. Japanese Knotweed was considered a threat to the Island's open spaces.
- 4.6.45 Support was expressed for dual use of school facilities rather than creation of new recreational spaces. One respondent however felt that access to existing sporting venues is limited for new sports, for example touch rugby, and dual use of such facilities is difficult to manage due to other commitments of the sites and the, often small, size of those venues.

- 4.6.46 One respondent felt that land which could be productive for food should not be given over to leisure development and another that the needs of the dairy industry were given too great a weight. Planting of trees was observed to compromise open vistas. Another respondent felt that a means to protect existing open spaces on the Island would be to accommodate development on reclaimed land.
- 4.6.47 The Development Plan's ability to make positive progress in the provision of recreation areas was considered limited as it would require a considerable amount of political will and leadership underpinned by detailed investigation to find out whether a facility will actually be well used on a long term basis. Funding of such facilities was also thought to be difficult in the present fiscal situation.

4.7 General

- 4.7.1 In addition to responses received which relate to the Environment Department's specific consultation on the key messages, issues and potential options which have emerged as part of the Plan Review, respondents also took the opportunity to make other comments on a number of other topics and these are summarised below along with general comments received about the consultation process.

General comments by topic

- 4.7.2 21 different individuals or organisations provided 33 general comments.
- 4.7.3 A UK approach to development, for example extensions to existing settlements, is not appropriate for Guernsey. Recognition of Guernsey's special environment, unique culture and rich heritage, and provision of public art should all be embraced by the Island Development Plan.
- 4.7.4 The interrelationship of the Island Development Plan with the Strategic Land Use Plan, emerging Transport Strategy and Guernsey Ports Masterplan was recognised.

Tourism

- 4.7.5 Several respondents felt that tourism had been overlooked by the Strategic Land Use Plan and therefore in the 2nd stage public consultation for the Island Development Plan.
- 4.7.6 It was suggested that a policy in the Island Development Plan could facilitate the incorporation of some mixed uses, including residential, on tourist sites to promote investment in that industry. However, other respondents thought that priority should be given to developers wishing to build, extend or upgrade to achieve high quality hotel accommodation over those wishing to redevelop such sites for housing.
- 4.7.7 It was observed that Guernsey's tourist population is generally getting older and that improvements in accessibility to attractions could encourage a greater

number of disabled visitors to the Island. In general, tourist attractions should be protected to be able to respond to any future increase in visitor numbers.

- 4.7.8 Conversely, one respondent supported change of use away from visitor accommodation to meet the Island's housing needs and to enhance the quality of the remaining hotels and self-catering units. It was considered important to ensure full occupancy of vacant buildings in tourism use.

Access

- 4.7.9 One respondent suggested that the Environment Department should have at least one staff member qualified to Access Consultant level. Other jurisdictions require access statements alongside applications and this could be of use in Guernsey.
- 4.7.10 The Island Development Plan should be written in conjunction with a Transport Strategy in order to encourage alternative means of travel to the private car. Paid parking was advocated along with reserving parking in the centre of Town for short term use and for shoppers and those with wheelchairs or buggies ahead of workers. It was noted that roads in many of the potential Local Centres are already overcrowded.

Planning Covenants

- 4.7.11 A question was raised as to whether there is some way of controlling the uplift in land value when development is permitted on a site in order to protect communities. The concept of planning covenants to enable the States to control development of sites and for community gain was supported.
- 4.7.12 Respondents also noted that Planning Covenants could be used to require the provision of green spaces and allotments within developments and /or require some development profits to finance community uses, environmental improvements, etc. for the wider public good. Some thought that another means by which to achieve community benefits could be the imposition of a tax on all vendors who sell houses for more than a certain sum.

Third party rights

- 4.7.13 A general comment was made that protection of third parties should be enhanced where development is proposed on sites adjoining their properties. Loss of a private view through development was considered unacceptable and it was suggested that policies more carefully control the scale and location of new buildings in this respect.

Decision making process

- 4.7.14 A comment was made that it is important that the Environment Department appreciates, the rapidity of market change when considering new policies, which should be flexible enough to respond, and should appreciate the potential effect a new Plan can have on the economy. It was also thought important that the cost of a build or development is taken into consideration during negotiations as unviable schemes can lead to sites being abandoned. A greater discretion and flexibility in decision-making was advocated although it

was also commented that the pace at which development comes forward should be controlled so the local construction industry can keep up.

General comments on the 2nd stage Public Consultation

- 4.7.15 13 different individuals or organisations provided 14 general comments.
- 4.7.16 Overall, respondents felt that the review of the Development Plans was making good progress and that the 2nd stage public consultation built appropriately on the first stage consultation, the Topic Papers. The summary booklet and evidence reports were found to be comprehensive and highly informative and the work which has been carried out by the Environment Department was appreciated. The carrying out of this additional and non-statutory consultation exercise was welcomed.
- 4.7.17 Two respondents would have preferred the opportunity to comment verbally rather than in writing and it was commented that this can result in local knowledge, for example of site history, access, etc. being omitted [presumably because it is considered that that verbal feedback might engage a broader sector of the population]. It was felt important that States Departments work together to provide for Guernsey into the future.
- 4.7.18 It was commented that it was unfortunate that the consultation period coincided with the summer holiday period. One respondent felt that there was no need to review the Island's existing Development Plans and another questioned the need for strategic plans and policy documents at all when dealing with such a small island. There was some concern that the good work done though this consultation process would be forgotten in future plan reviews.
- 4.7.19 One comment stated that the consultation was too focused on development and did not take enough account of the need to preserve land for agriculture, horticulture, habitat, open space and natural beauty.

5 Next steps

- 5.1.1 The Environment Department would like to take this opportunity to thank everyone who has taken part in this second stage consultation. It is clear that a lot of thought has been given to how Islanders want to see Guernsey develop in the future. Comments received have given a valuable insight into how the Island functions and what people value from a variety of perspectives.
- 5.1.2 Whilst it is natural to consider all aspects of a topic in the round, the Island Development Plan can only address those aspects that can be managed through land use planning. Where comments have been given that do not relate to land use every effort will be made to pass these on to the relevant organisations or States Departments.
- 5.1.3 All responses to the 2nd stage consultation, Key Messages, Issues and Options and submissions to the 'Call for Sites' will inform the preparation of policies and the Draft Island Development Plan. The Environment Department expects to

publish a Draft Island Development Plan in Spring of 2014. The draft plan will be subject to a public inquiry and representations both for and against the proposed policies, can be submitted to the Planning Inquiry for consideration by an independent Planning Inspector. The Public Inquiry is expected to be held in Autumn 2014 and subsequently, the Draft Island Development Plan together with any proposed changes will be put forward for States consideration in 2015.

- 5.1.4 Each stage will be advertised through a variety of media. Meanwhile, any further updates will be available on the States website, or through letters and emails to those who choose to register on the Plan Review database.

Appendix A

Presentations & Workshops

The following groups and organisations received a presentation by staff of the Environment Department and contributed to discussion forums regarding the 2nd stage consultation, on the key messages, issues and possible options:

- CPD forum on 13th June 2013
- Construction forum on 3rd July 2013
- Agents Forum on 17th June 2013

A workshop focused on employment land was held on 3rd October 2013 in Beau Sejour to discuss the Environment Department's findings and the consultation material on industrial, office and storage and distribution sectors of the economy. The following people attended:

Larry Granger, Confederation of Guernsey Industry
Tina James, Guernsey Enterprise Agency
Lucy Gosselin, Swoffers Commercial
Joanna Watts, Watts & Co.
Eric Legg, Construction Industry Forum
Andrew Ozanne, Walter Property and Lovell Ozanne
Steve Marie, Comprop
Andrew Carey, Commerce & Employment
Philip Henderson, Commerce & Employment

As part of the Plan Review process the Environment Department has, and continues to have, meetings and discussions with technical consultees and other State Departments.