

APPENDIX 7
PROPOSED AMENDMENTS TO THE ISLAND DEVELOPMENT PLAN
(INCLUDING PROPOSAL MAP AMENDMENTS)
SEPTEMBER, 2015

Proposed Amendments to the
Draft Island Development Plan, September 2015

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1. Introduction

- 1.1 This report has been prepared to inform the review of the Island's Development Plans and the associated Public Hearing. It sets out changes proposed by the Environment Department to the published draft Island Development Plan, Proposals Map and Supplementary Planning Guidance and represents an ongoing refinement of the draft Plan and associated documents taking into account comments received since the publication and latest information ensuring that the draft Plan remains relevant and robust. It is intended that this report will make the proposed changes clear to the Planning Inspectors, and all other interested parties, in advance of the commencement of the Public Hearing.
- 1.2 The report includes a table of proposed changes to the draft Island Development Plan setting out the summary reason for the change, the type of change and the proposed amendment, alongside a separate annex comprising a map showing the location of proposed mapping amendments and a suite of inset maps which indicate the proposed spatial changes to allocations and designations.

2. Background

- 2.1 The draft Island Development Plan, Proposals Map and Supplementary Planning Guidance were published on 16th February 2015. Two rounds of public consultation, the Initial Representations stage (16th February-13th April 2015) and the Further Representations stage (15th June -24th July 2015) provided the opportunity for members of the public to make comments on the content of the draft Island Development Plan. Following each stage, the Environment Department's considered response to each of the comments received was published.
- 2.2 A number of changes to the draft Island Development Plan, Proposals Map and Supplementary Planning Guidance documents have been proposed to respond to comments made and questions raised through the Initial and Further Representations consultations. The Environment Department also proposes additional changes which address matters which have come to light since publication of the draft Plan through further perusal of the documents or new information becoming available.

3. Proposed Amendments

- 3.1 The report sets out the proposed changes in the form of a number of tables: one for each section of the draft Plan and a further two to set out changes to the Proposals Map and Supplementary Planning Guidance. Where there are no changes proposed to a particular section of the draft Plan, it is made clear within the text. An explanation of the reasons behind proposing each change is set out and where the change is in response to an Initial and/or Further Representations the table contains the relevant reference (e.g. IR101 or FR102) or if this is not the case sets out that the change is an Environment Department revision. The tables also provide an indication as to whether the changes are considered to be significant, for example, changes to policy, or not significant, for example changes to wording for consistency between policies or text in terms of their impact on the substance of the draft Plan.
- 3.2 Where text is proposed to be removed from the paragraphs or policies, the relevant text is struck through (e.g. remove). Where additional or replacement text is proposed this is indicated in bold (e.g. include). In some cases, different changes were proposed to the same paragraph at the Initial Representation and Further Representation stages. These changes are highlighted using different colours (red for the Initial Representation stage and blue for the Further Representation stage) so that the process of change can be understood.
- 3.4 Annex I of the report provides a table of typographical errors (typos) which have been noted by the Department but which are considered not significant changes to the content of the draft Island Development Plan, Proposals Map or Supplementary Planning Guidance. Annex II of the report is a separate document comprising a map showing the location of the proposed mapping amendments and a suite of inset maps which detail the proposed spatial changes to allocations and designations.
- 3.5 The changes proposed have been checked for any impact on the Environmental Statement, which was published in February 2015 alongside the draft Plan. None of the changes are significant as regards the Environmental Impact Assessment of the draft policies.
Other than amendments to text or policies quoted directly from the draft Island Development Plan in line with the changes set out in this report, those changes which impact on the Environmental Statement are limited to changes to designations or

allocations shown on the Proposals Map. It is the Department's intention to update the Environmental Statement following the Public Hearing, in the light of the recommendations of the Planning Inspectors.

- 3.5 The Environment Department does not consider that the changes referred to in this report would result in any inconsistency with the approved Strategic Land Use Plan (2011).

4. Tables of Changes

Contents pages

The Environment Department proposes the following change to this section of the draft Island Development Plan.

| Ref. | Change | Source | Para. | Issue | Proposed amendment |
|------|-----------------|----------------|----------------|--|--|
| PA1 | Not Significant | IR904 IR913 | Contents pages | A list of all of the policies would be a useful addition | Include a list of Plan policies to follow the contents table |

1. About the Island Development Plan

The Environment Department proposes the following changes to this section of the draft Island Development Plan.

| Ref. | Change | Source | Para. | Issue | Proposed amendment |
|------|--|--------|-------|---|--|
| | What does the Island Development Plan contain? | | | | |
| PA2 | Not Significant | IR884 | 1.18 | Local Centres description missing from 'location specific policy areas' box below paragraph 1.18 | Add to the box under paragraph 1.18 as follows: "Local Centre The Local Centres are small existing settlements beyond the Main Centres incorporating a range of facilities and services and shops which support the local population and act as community focal points." |
| PA3 | Not Significant | IR13 | 1.18 | The characteristics of the Main Centre and Main Centre Outer Area as described in the 'location specific policy areas' box below paragraph 1.18 are very similar. | Amend the text in the box under paragraph 1.18 as follows: "Main Centre |

| Ref. | Change | Source | Para. | Issue | Proposed amendment |
|------|-----------------|---------------------------------|-------|--|---|
| | | | | The descriptions could differentiate between the two areas more clearly | <p>The Main Centres of Town and the Bridge have inner areas which are essentially the core, mixed-use, urban areas with a diverse range of activities taking place within them and generally characterised by high density development. They are the core focus for economic and social growth, the main shopping areas of the Island with retail fundamental to their success and they are also focal points for a mix of other uses including leisure activities, office development and support service industries.</p> <p>Main Centre Outer Area The Main Centre Outer Areas are the predominantly high density, mixed-use, urban areas which surround and support the Main Centres of Town and the Bridge. Whilst Main Centres are the core focus for economic and social growth, Main Centre Outer Areas provide capacity to accommodate uses and activity that in turn support the vitality and viability of the Main Centres.</p> |
| PA4 | Not Significant | Environment Department revision | 1.26 | Clarification is required as to the status of the strategies and reports referred to in the draft Plan | <p>Add paragraph 1.26 as follows:</p> <p>“In applying the policies of the Island Development Plan, the Environment Department will take into account any States’ approved strategies, or any subsequent amended or revised documents, or any relevant direction by the States of Guernsey.”</p> |

| Ref. | Change | Source | Para. | Issue | Proposed amendment |
|---|-----------------|----------------|-------|--|---|
| | | | | | |
| How will the Island Development Plan be monitored and reviewed? | | | | | |
| PA5 | Not Significant | IR904 IR913 | 1.27 | A basic map with the outline of Guernsey and identifying the Main and Local Centres would be a useful addition | Include, below paragraph 1.27 a basic map of Guernsey indicating the location of the Main and Local Centres |

2. Aims and Objectives of the Island Development Plan

The Environment Department proposes the following changes to this section of the draft Island Development Plan.

| Ref. | Change | Source | Para. | Issue | Proposed amendment |
|---|-----------------|--------|--------|---|--|
| Objectives of the Island Development Plan | | | | | |
| PA6 | Not Significant | IR236 | 2.2.18 | The draft Island Development Plan does not specifically recognise that a growing section of the ageing population is increasingly finding that the built and natural environments are less accessible to them. The Plan should recognise this particular social pressure and the States commitment to equality of opportunity and the Disability and Inclusion Strategy | Add as new paragraph after paragraph 2.2.18: "Through the control of development, the Island Development Plan has a significant part to play in removing the barriers that prevent some islanders being fully included in Island life. In recent years, the States of Guernsey have developed a much greater understanding of the likely impact of an ageing demographic and have approved the Disability and Inclusion Strategy, 2013. The Island Development Plan has responded positively to this by seeking to enable a balance to be achieved between conservation and the needs of disabled people, as is demonstrated across the Plan but |

| Ref. | Change | Source | Para. | Issue | Proposed amendment |
|------|-----------------|--------|--------|--|---|
| | | | | | specifically in paragraph 19.6.3 (Protected Buildings)." |
| PA7 | Not Significant | IR1238 | 2.2.19 | Clarification is required as to when a development might be considered residential development and when it might be considered a social or community use | Add the following at the end of paragraph 2.2.19: "Proposals relating to development that incorporates a care element, such as hospitals, nursing homes or residential establishments for the provision of accommodation and care along with residential schools, colleges and training centres, may, as appropriate, be assessed under policies relating to housing and/or social and community facilities depending on the nature and detail of the use." |

3. Spatial Policy

The Environment Department proposes the following changes to this section of the draft Island Development Plan.

| Ref. | Change | Source | Para. | Issue | Proposed amendment |
|------|-------------------------------------|------------------------|-------|---|---|
| | Development of Strategic Importance | | | | |
| PA8 | Not Significant | Environment Department | 3.6.1 | The paragraph requires the proposal to be in conflict with the Spatial Policy or other specific | Amend paragraph 3.6.1 to the following: |

| Ref. | Change | Source | Para. | Issue | Proposed amendment |
|------|-----------------|---------------------------------------|-----------|---|--|
| | | revision, FR23 | | policy of the Plan which will not always be the case. For example, proposals for large scale public transport infrastructure are required to go through Policy S5 but will not necessarily be in conflict with the Spatial Policy. This is not consistent with other plan policies. | “Where a development would address issues concerning the health or safety or well-being or security of the community, or is otherwise clearly in the public interest, the Environment Department may support proposals that could conflict with the spatial policies or other specific policies of the Island Development Plan.” |
| PA9 | Not Significant | Environment Department revision, FR23 | Policy S5 | <p>Paragraph 3.6.1 states, in relation to a number of possible strategically important developments, that these would be assessed against Policy S5, regardless of whether they may conflict with Policy S1: Spatial Policy.</p> <p>The first sentence of Policy S5 requires the proposal to be in conflict with the Spatial Policy or other specific policy of the Plan which will not necessarily be the case. For example, proposals for large scale public transport infrastructure are required to go through Policy S5 but will not always be in conflict with the Spatial Policy. This is not consistent with other plan policies.</p> | <p>Amend the 1st paragraph of draft Policy S5 to the following:</p> <p>“Proposals for development that is of Strategic Importance and that which may conflicts with the Spatial Policy or other specific policies of the Island Development Plan but which is clearly demonstrated to be in the interest of the health, or well-being, or safety, or security of the community, or otherwise in the public interest may, exceptionally, be allowed where:</p> <p>a. there is no alternative site available that, based on evidence available to the Environment Department, is more suitable for the proposed development; and,</p> <p>b. the proposals accord with the Principal Aim and relevant Plan Objectives.”</p> |

4. Main Centre Policies

The Environment Department does not propose any change to this section of the draft Island Development Plan.

5. Important Open Land in and around Main Centres

The Environment Department does not propose any change to this section of the draft Island Development Plan.

6. Living in and around Main Centres

The Environment Department proposes the following change to this section of the draft Island Development Plan.

| Ref. | Change | Source | Para. | Issue | Proposed amendment |
|---|-----------------|--------|------------|--|--|
| Housing in Main Centres and Main Centre Outer Areas | | | | | |
| PA10 | Not Significant | IR934 | 6.1.9 | Proposals for the development of 5 or more dwellings are required to provide a proportion of the developable area of the site for affordable housing. The draft Plan is not clear in explaining that this applies to the net increase in units on the site | Amend paragraph 6.1.9 to the following: “All proposals for housing development resulting in a net increase of five or more dwellings will be required to provide a proportion of affordable housing in accordance with Policy GP11: Affordable Housing.” |
| PA11 | Not Significant | IR934 | Policy MC2 | Proposals for the development of 5 or more dwellings are required to provide a proportion of the developable area of the site for affordable housing. The draft Plan is not clear in explaining that this applies to the net increase in units on the site | Amend 5 th paragraph of draft Policy MC2 to the following: “All proposals for housing development resulting in a net increase of five or more dwellings will be required to provide a |

| Ref. | Change | Source | Para. | Issue | Proposed amendment |
|---|-----------------|--------|-------|---|---|
| | | | | | proportion of affordable housing in accordance with Policy GP11: Affordable Housing.” |
| Social and Community Facilities in Main Centres and Main Centre Outer Areas | | | | | |
| PA12 | Not Significant | IR563 | 6.2.4 | Draft Plan Policy MC9(B) includes similar criteria relating to change of use of premises as Policy MC3 but the latter does not refer to the provision of guidance on how to demonstrate that a facility is no longer required | Add, for consistency, to the end of paragraph 6.2.4: “Guidance on how to demonstrate re-provision of a facility and how to demonstrate that a facility is no longer required will be provided by the Environment Department.” |

7. Working in and around Main Centres

The Environment Department proposes the following changes to this section of the draft Island Development Plan.

| Ref. | Change | Source | Para. | Issue | Proposed amendment |
|-----------------------------------|-----------------|--------|-------|---|---|
| Retail in Main Centre Outer Areas | | | | | |
| PA13 | Not Significant | IR1303 | 7.4.2 | The flexibility for existing retail uses provided for in the draft Plan for Main Centres should also be explicitly provided for in Main Centre Outer Areas, particularly given that the Main Centres are the focus for economic activity in terms of the Spatial Policy | Amend paragraph 7.4.2 to the following: “In order to maintain and enhance the vitality of retail provision within the Main Centres and the Core Retail Areas retail provision around the Main Centres must be carefully managed. In this respect new comparison retail will be directed to the Main Centres and will not be supported within the Main Centre Outer Areas. The Environment Department will offer flexibility |

| Ref. | Change | Source | Para. | Issue | Proposed amendment |
|---|-----------------|----------------|------------|--|---|
| | | | | | for existing retail uses to change to other uses providing the proposal accords with all other relevant policies of the Island Development Plan." |
| PA14 | Not Significant | IR1303 | Policy MC7 | The flexibility for existing retail uses provided for in the draft Plan for Main Centres should also be explicitly provided for in Main Centre Outer Areas, particularly given that the Main Centres are the focus for economic activity in terms of the Spatial Policy | Amend draft Policy MC7 to add the following after the 3 rd paragraph: "Proposals to change use away from retail will be supported where it accords with all other relevant policies of the Island Development Plan." |
| Visitor Accommodation in Main Centres and Main Centre Outer Areas | | | | | |
| PA15 | Not Significant | IR640 FR222 | 7.6.3 | The wording of paragraph 7.6.3 is not consistent with the policy approach of draft Plan Policies MC8, LC6 and OC8 Further to the publication of the Guernsey Tourism Strategic Plan 2015-2025, amendments are needed to the title and date of the document and to reflect that the increase in visitor numbers is a target or aspiration and not a specific forecast. With regard to the retention of accommodation, this is not specifically stated in the Strategic Plan but is inherent in the approach of both the Strategic Plan and the Island Development Plan. | Amend paragraph 7.6.3 to the following: "The Visit Guernsey and Chamber of Commerce Tourism and Hospitality Sub- Group Strategic Plan, 2014 2015 -2025, supported approved by the States of Guernsey Commerce and Employment Department, forecasts seeks to deliver growth in the Guernsey tourism economy over the Island Development Plan period. This would result in an increase from 30 09 ,000 to 400,000 visitors to the Island per year by 2025. To meet the need for good quality accommodation and a range of accommodation choices the Tourism Group Strategic Plan identifies there is a need to retain existing visitor |

| Ref. | Change | Source | Para. | Issue | Proposed amendment |
|------|-----------------|--------|-------|---|--|
| | | | | | accommodation and facilitate an increase in good value Three Star and above new hotels accommodation at all star rating levels. This however does not discount the value that good quality One and Two Star establishments contribute to the industry." |
| PA16 | Not Significant | IR641 | 7.6.7 | The wording of paragraph 7.6.7 is not consistent with the policy approach of draft Plan Policies MC8, LC6 and OC8 | Amend paragraph 7.6.7 to the following: "Previously there has been a process of rationalisation of the Island's stock of visitor accommodation which has been successful in stimulating investment and establishing a sustainable level of accommodation. However, in order to ensure that the Island retains a sufficient level of accommodation to support the visitor economy, meet forecast demand and ensure a range of types of accommodation, there will be a need to resist the further loss of some visitor accommodation establishments other than in exceptional circumstances." |

8. Spending Leisure Time in and around Main Centres

The Environment Department does not propose any change to this section of the draft Island Development Plan.

9. Identified Development Opportunity Areas

The Environment Department does not propose any change to this section of the draft Island Development Plan.

10. Local Centre Policies

The Environment Department proposes the following changes to this section of the draft Island Development Plan.

| Ref. | Change | Source | Para. | Issue | Proposed amendment |
|--------------|-----------------|---------------------------------|--------|---|---|
| Introduction | | | | | |
| PA17 | Not Significant | Environment Department revision | 10.1.3 | The Local Centre indicators mentioned in paragraph 10.1.3 of the draft Plan do not match those listed in the report Identifying Local Centres, 2015 and also introduce a threshold of 5 indicators which was not previously mentioned | <p>Amend paragraph 10.1.3 to the following:</p> <p>“The Environment Department considers a sustainable Local Centre has a clear and identifiable mix of uses containing at least five of the sustainability indicators. It is considered that a general store selling fresh food and produce is a necessary element for a Local Centre, together with at least four other sustainability indicators. Sustainability indicators include:</p> <ul style="list-style-type: none"> • A general convenience store selling fresh produce; • A doctor’s surgery; • A primary school/pre-school; • A bank or cash point; • An amenity area; • Community facilities; • Leisure and recreation facilities; • A post office; • A bus service; • Employment.” |

11. Important Open Land in Local Centres

The Environment Department does not propose any change to this section of the draft Island Development Plan.

12. Living in Local Centres

The Environment Department proposes the following changes to this section of the draft Island Development Plan.

| Ref. | Change | Source | Para. | Issue | Proposed amendment |
|--------------------------|-----------------|--------|--------|---|---|
| Housing in Local Centres | | | | | |
| PA18 | Not Significant | IR903 | 12.1.4 | The flexibility for extension of existing specialised housing facilities on to adjacent land outside the boundary of a Local Centre is unreasonably constrained by an implied requirement to demonstrate 'need' | Amend paragraph 12.1.4 to the following: "The extension and alteration of existing specialised housing facilities will be supported in Local Centres. In exceptional circumstances, where existing specialised housing facilities need are proposed to be extended and where this would require extension onto land adjacent to the existing facility but outside of the Local Centre boundaries, such proposals will be supported providing that they accord with the other policies in the Island Development Plan.' |

| | | | | | |
|------|-----------------|----------------|---------------------------|--|--|
| PA19 | Significant | FR247 FR270 | 12.1.4 foot- note 6 | Housing terms used and defined in the draft Plan required further clarification and amendments, including for consistency with other legislation and proposed legislation and terms used by other States Departments. | Amend footnote number 6, linked to paragraph 12.1.4, as follows: “6 Specialised housing is housing units with care provided to residents such as extra care accommodation and/or supported living or sheltered housing schemes ; , nursing and residential homes and other accommodation for people in need of care. Generally, care staff operate on-site and residents tend to live in single room accommodation. Typically, the owner of the properties is responsible for maintenance and management and the States of Guernsey is responsible for the provision of care and support ” |
| PA20 | Not Significant | IR934 | 12.1.8 | Proposals for the development of 5 or more dwellings are required to provide a proportion of the developable area of the site for affordable housing. The draft Plan is not clear in explaining that this applies to the net increase in units on the site | Amend paragraph 12.1.8 to the following: “All proposals for housing development resulting in a net increase of five or more dwellings will be required to provide a proportion of affordable housing in accordance with Policy GP11: Affordable Housing.” |
| PA21 | Not Significant | IR934 | Policy LC2 | Proposals for the development of 5 or more dwellings are required to provide a proportion of the developable area of the site for affordable housing. The draft Plan is not clear in explaining that this applies to the net increase in units on the site | Amend 3 rd paragraph of draft Policy LC2 to the following: “All proposals for housing development resulting in a net increase of five or more dwellings will be required to provide a proportion of affordable housing in accordance with Policy GP11: Affordable Housing.” |

| Social and Community Facilities in Local Centres | | | | | |
|--|-----------------|-------|--------|--|--|
| PA22 | Not Significant | IR563 | 12.2.7 | Draft Plan Policy MC9(B) includes similar criteria relating to change of use of premises as Policy LC3(B) but the latter does not refer to the provision of guidance on how to demonstrate that a facility is no longer required | Add, for consistency, to the end of paragraph 12.2.7: “Guidance on how to demonstrate re-provision of a facility and how to demonstrate that a facility is no longer required will be provided by the Environment Department.” |

13. Working in Local Centres

The Environment Department proposes the following changes to this section of the draft Island Development Plan.

| Ref. | Change | Source | Para. | Issue | Proposed amendment |
|--|-----------------|----------------|--------|--|--|
| Visitor Accommodation in Local Centres | | | | | |
| PA23 | Not Significant | IR640 FR222 | 13.4.3 | <p>The wording of paragraph 13.4.3 is not consistent with the policy approach of draft Plan Policies MC8, LC6 and OC8</p> <p>Further to the publication of the Guernsey Tourism Strategic Plan 2015-2025, amendments are needed to the title and date of the document and to reflect that the increase in visitor numbers is a target or aspiration and not a specific forecast. With regard to the retention of accommodation, this is not specifically stated in the Strategic Plan but is inherent in the approach of both the Strategic Plan and the Island Development Plan</p> | <p>Amend paragraph 13.4.3 to the following:</p> <p>“The Visit Guernsey and Chamber of Commerce Tourism and Hospitality Sub-Group Strategic Plan, 20142015-2025, supported approved by the States of Guernsey Commerce and Employment Department, forecasts seeks to deliver growth in the Guernsey tourism economy over the Island Development Plan period. This would result in an increase from 3009,000 to 400,000 visitors to the Island per year by 2025. To meet the need for good quality accommodation and a range of accommodation choices the Tourism Group</p> |

| | | | | | |
|------|-----------------|--------|--------|---|--|
| | | | | | <p>Strategic Plan identifies there is a need to retain existing visitor accommodation and facilitate an increase in good value Three Star and above new hotels accommodation at all star rating levels. This however does not discount the value that good quality One and Two Star establishments contribute to the industry."</p> |
| PA24 | Not Significant | IR641 | 13.4.6 | The wording of paragraph 13.4.6 is not consistent with the policy approach of draft Plan Policies | Amend paragraph 13.4.6 to the following: |
| Ref. | Change | Source | Para. | Issue | Proposed amendment |
| | | | | MC8, LC6 and OC8 | <p>"Previously there has been a process of rationalisation of the Island's stock of visitor accommodation which has been successful in stimulating investment and establishing a sustainable level of accommodation. However, in order to ensure that the Island retains a sufficient level of accommodation to support the visitor economy, meet forecast demand and ensure a range of types of accommodation, there will be a need to resist the further loss of some visitor accommodation establishments other than in exceptional circumstances."</p> |

14. Spending Leisure Time in Local Centres

The Environment Department does not propose any change to this section of the draft Island Development Plan.

15. Policies for Outside of the Centres

The Environment Department does not propose any change to this section of the draft Island Development Plan.

16. Living Outside of the Centres

The Environment Department proposes the following changes to this section of the draft Island Development Plan.

| Ref. | Change | Source | Para. | Issue | Proposed amendment |
|------|--------------------------------|---------------------------------|--------|---|---|
| | Housing Outside of the Centres | | | | |
| PA25 | Significant | Environment Department revision | 16.1.7 | To give proposals for subdivision the opportunity to demolish and rebuild where appropriate, in line with current provisions in the Rural Area Plan and consistent with draft Policy GP16 (B): Conversion of Redundant Buildings - Demolition and Redevelopment | Insert after paragraph 16.1.7 the following, and renumber ensuing paragraphs from 16.1.13 to 16.1.15: “Development of a protected building is sometimes required in order to sustain its special interest. Therefore, in cases where the structure is a protected building, its alteration and conversion or subdivision will, in principle, be acceptable subject to the proposals demonstrating that special attention has been |

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|--|--|--|--|--|--|
| | | | | | <p>paid to the specific historic or other interest and setting of the particular building and that such interest is appropriately and proportionately preserved and, where possible, enhanced as part of the development management of the conversion or subdivision. Proposals to convert or subdivide protected buildings must also accord with Policy GP5: Protected Buildings.</p> <p>In some cases, there may be redundant buildings that are not of a sufficiently high enough architectural and historic interest to warrant the status of a protected building but which do make a particular positive contribution to the character of the area. Examples include farmhouses, traditional stone buildings or buildings which are positioned and have a relationship with each other so that they make an important contribution to the character of a locality. In such circumstances, where the Environment Department is of the opinion that the building does make a particular positive contribution to the character of an area, it will ensure that the works to convert or subdivide the building do not have an unacceptable impact on the character and appearance of the area.</p> |
|--|--|--|--|--|--|

| Ref. | Change | Source | Para. | Issue | Proposed amendment |
|------|--------|--------|-------|-------|---|
| | | | | | <p>In order to enable the reasonable consideration of development proposals, the demolition and redevelopment of a dwelling that is able to satisfy the requirements for subdivision may be acceptable without the need to implement the permission for subdivision by physically carrying out the development, provided that the subdivision scheme has first been granted planning permission and that the floor space and volume of the new building is broadly the same as the approved subdivision scheme and the number of units approved is not exceeded. In such cases, all other relevant policies of the Island Development Plan will need to be satisfied.</p> <p>This will enable consideration to be given to the potential to relocate a structure on the site or to the use of sustainable building and construction techniques to achieve enhancements not possible through the subdivision alone. In this respect, when the demolition and redevelopment of the existing dwelling is proposed, in order to support such proposals the Environment Department will need to be satisfied that there is a significant enhancement in terms of the sustainable design and construction of the new building and that there are no increased impacts</p> |

| Ref. | Change | Source | Para. | Issue | Proposed amendment |
|------|--------|--------|-------|-------|--|
| | | | | | <p>on neighbouring properties or the character of openness of the area.</p> <p>With regard to the subdivision of existing dwellings that are identified as being protected buildings, the demolition and redevelopment of the structure will be considered under Policy GP5: Protected Buildings. In the case of buildings that make a particular positive contribution to the character of the area, in considering their demolition following consent to subdivide the building, the Environment Department will determine, on a case by case basis, whether it considers the proposed replacement building/s to be of such high quality design that it would enhance the character and appearance of the area and make a more positive contribution than the building it is proposed to replace.”</p> |

| Ref. | Change | Source | Para. | Issue | Proposed amendment |
|------|-----------------|---------------------------------|--------|--|---|
| PA26 | Not Significant | Environment Department revision | 16.1.8 | To be consistent with changes proposed to draft Policy OC1 and other policies of the Plan. | Amend paragraph 16.1.8 as follows: “All proposals for conversion of a redundant building to five or more dwellings , or the subdivision of an existing dwelling/s resulting in a net increase of five or more dwellings, will be required to provide a proportion of affordable housing in accordance with Policy GP11: Affordable Housing.” |
| PA27 | Not Significant | Environment Department revision | 16.1.9 | To be consistent with changes proposed to draft Policy OC1 and other policies of the Plan. | Amend paragraph 16.1.9 as follows: “In order to ensure that appropriate environmental management practises are followed during the demolition and construction phase of projects to demolish and rebuild redundant buildings (Policies GP16(A): Conversion of Redundant Buildings, and GP16(B): Conversion of Redundant Buildings - Demolition and Redevelopment), or to demolish and rebuild dwellings which have planning permission to be subdivided , in accordance with the policies of the Island Development Plan relating to those proposals, a Waste Management Plan will be |

| Ref. | Change | Source | Para. | Issue | Proposed amendment |
|------|--------------------|---------------------------------|------------|---|--|
| | | | | | required to be submitted with a planning application, which shall demonstrate, to the satisfaction of the Environment Department, how waste associated with the development process is to be minimised, how existing materials are to be reused on or off the site and how residual waste will be dealt with.” |
| PA28 | Significant | Environment Department revision | Policy OC1 | In order to give proposals for subdivision the opportunity to demolish and rebuild where appropriate in line with current provisions in the Rural Area Plan and consistent with policy GP16(B): Conversion of Redundant Buildings - Demolition and Redevelopment. | <p>Amend draft Policy OC1 in its entirety as follows:</p> <p>“Outside of the Centres, proposals for the creation of new dwellings will only be supported where this is achieved through the subdivision of an existing dwelling or the conversion of an existing redundant building.</p> <p>Proposals for the conversion of redundant buildings to dwellings will be considered under Policies GP16(A) and GP16(B): Conversion of Redundant Buildings.</p> <p>The subdivision of a dwelling into two or more self-contained units or into a house for multiple occupation will only be supported where:</p> <p>a. the resultant development would be compatible with the character and amenities of the surrounding area; and,</p> <p>b. the development would be acceptable in terms</p> |

| Ref. | Change | Source | Para. | Issue | Proposed amendment |
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| | | | | | <p>of provision of a satisfactory living environment and amenities; and,</p> <p>c. the subdivision would not involve more than a modest extension to the existing building to create adequate accommodation and the extension is not of such a scale that it forms a significant part of any new unit.</p> <p>The demolition and redevelopment of a building that is able to accord with the above requirements may be acceptable without the need to implement the permission for subdivision by physically carrying out the development, provided that:</p> <p>i. the subdivision scheme has first been granted planning permission; and,</p> <p>ii. the redeveloped scheme is of broadly the same floor space and volume as the approved subdivision scheme and, in the case of development for residential purposes, the number of units approved in the subdivision scheme is not exceeded; and,</p> <p>iii. where the existing building makes a particular positive contribution to the character of an area the replacement building would make an equal or enhanced contribution to the character of that</p> |

| Ref. | Change | Source | Para. | Issue | Proposed amendment |
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| | | | | | <p>area; and,</p> <p>iv. it can be demonstrated to the Environment Department's satisfaction that the new building can be constructed in such a way as to significantly enhance its sustainable design; and,</p> <p>v. it can be demonstrated to the Environment Department's satisfaction that the new building can be constructed in such a way as to not have any increased adverse impacts on the character or openness of an area; and,</p> <p>vi. it can be demonstrated to the Environment Department's satisfaction that the new building can be constructed in such a way as to not have any increased impacts on the amenities or reasonable enjoyment of occupiers of neighbouring properties and the surrounding area.</p> <p>Notwithstanding a scheme receiving permission for subdivision, the demolition or partial demolition of protected buildings will be considered under Policy GP5: Protected Buildings.</p> <p>In all cases, a Waste Management Plan shall be submitted with a planning application, which shall demonstrate, to the satisfaction of the</p> |

| Ref. | Change | Source | Para. | Issue | Proposed amendment |
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| | | | | | <p>Environment Department, how waste associated with the development process is to be minimised, how existing materials on site are to be reused on or off site and how residual waste will be dealt with.</p> <p>Proposals for the conversion of redundant buildings to dwellings will be considered under Policies GP16(A) and GP16(B): Conversion of Redundant Buildings.</p> <p>All proposals for conversion of a redundant building to five or more dwellings, or the subdivision of an existing dwellings resulting in a net increase of five or more dwellings, will be required to provide a proportion of affordable housing in accordance with Policy GP11: Affordable Housing.”</p> |

17. Working Outside of the Centres

The Environment Department proposes the following changes to this section of the draft Island Development Plan.

| Ref. | Change | Source | Para. | Issue | Proposed amendment |
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| Offices, Industry and Storage and Distribution Outside of the Centres | | | | | |
| PA29 | Not Significant | IR419 FR39 | 17.1.6 | <p>Rather than restrict the use of land at La Villiaze to light industrial uses only, the designation has been broadened to open up for consideration general industrial and storage and distribution uses in line with the nature of the adjoining site. This should be clarified in the text supporting Policy OC3</p> <p>The flexibility to allow for minor development to occur at La Villiaze prior to the approval of a Development Framework would be considered appropriate by the Environment Department and consistent with the approach taken elsewhere in the draft Island Development Plan</p> | <p>Amend the wording of paragraph 17.1.6 to:</p> <p>“As an exception, the Island Development Plan makes provision for industrial and storage and distribution uses at the designated site at La Villiaze, Forest, as shown on the Proposals Map. This area of land to the north of the airport runway was identified previously by the States as being of strategic value for light industrial use and reserved for such purposes. The site’s strategic value remains but rather than restrict the site to light industrial uses only, the land is identified as an area reserved for industrial and storage and distribution development and is identified as a Key Industrial Expansion Area on the Proposals Map. Due to its size and potential impact a Development Framework will be required for this site which will form Supplementary Planning Guidance once approved and will be taken into account by the Environment Department when considering proposals for the site. This will ensure that the scheme is well planned from the outset in accordance with guidance provided by the Environment</p> |

| Ref. | Change | Source | Para. | Issue | Proposed amendment |
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| | | | | | <p>Department. This will also ensure the public has the opportunity to study and comment on development proposals before they are formally submitted as a planning application. Where a Development Framework has been approved the Environment Department will expect proposals to accord with it. An approved Development Framework will provide a comprehensive framework for the whole of the identified site and the Environment Department will take it into account when considering proposals for the site and will expect proposals to accord with it. There may be more than one Development Framework approved for a site. Development may be supported prior to the approval of a Development Framework where it is unlikely to inhibit the implementation of industrial and storage and distribution development and would not prejudice the comprehensive development of the site. Development Frameworks are further explained in (see Annex III: Development Frameworks and Local Planning Briefs.)”</p> |

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| PA30 | Not Significant | IR418 FR39 | Policy OC3 | <p>The Key Industrial Expansion Area identified at La Villiaze is supported for industrial and storage uses as an exception to the general approach as stated in paragraph 17.1.6 and should not therefore be required to satisfy the test of justifiable need set out in criterion (a)</p> <p>The flexibility to allow for minor development to occur at La Villiaze prior to the approval of a Development Framework would be considered appropriate by the Environment Department and consistent with the approach taken elsewhere in the draft Island Development Plan</p> | <p>Amend the 2nd paragraph of draft Policy OC3 to the following:</p> <p>" Proposals for new industrial and storage and distribution uses will only be supported where:</p> <p>a. it is located at the Key Industrial Expansion Area site at La Villiaze, Forest and is in accordance with an approved Development Framework for that site which will form Supplementary Planning Guidance and will be taken into account by the Environment Department when considering proposals for the site. Development may be supported prior to the approval of a Development Framework for this site where it is unlikely to inhibit the implementation of industrial or storage and distribution development and would not prejudice the comprehensive development of the site; or</p> <p>b. there is a justifiable need for the business to be located outside the Main Centres, Main Centre Outer Areas and Local Centres owing to the special nature or requirements of the business operation or there being a demonstrated lack of suitable alternative</p> |
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| Ref. | Change | Source | Para. | Issue | Proposed amendment |
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| | | | | | <p>sites in the Main Centres, Main Centre Outer Areas or Local Centres; and</p> <p>c. the site is either a brownfield or a redundant glasshouse site and complies with Policy OC7: Redundant Glasshouse Sites Outside of the Centres; or</p> <p>d. it can be achieved through the conversion of a redundant building and complies with Policies GP16(A) and GP16(B): Conversion of Redundant Buildings.</p> <p>d) it is located at the allocated site at La Villiaze, Forest and is in accordance with an approved Development Framework for that site which will be taken into account by the Environment Department when considering proposals for the site."</p> |

| Agriculture Outside of the Centres | | | | | |
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| PA31 | Not Significant | IR222 | 17.3.1 | The different policy approaches for land with glasshouse(s) (in use or redundant) could be clearer if it followed the terminology used elsewhere in the draft Plan | Amend paragraph 17.3.1 to the following: “However, certain agricultural land, which is horticultural land or current or former glasshouse land or a redundant glasshouse site , will be considered against the specific policies relating to this particular type of agricultural land because of the particular land planning issues it raises, i.e. horticulture or redundant glasshouse sites Outside of the Centres in this Plan (see Policy OC6: Horticulture Outside of the Centres and Policy OC7: Redundant Glasshouse Sites Outside of the Centres).” |
| PA32 | Not Significant | Environment Department revision | 17.3.7 | A requirement to demonstrate that no other buildings, solely, are available for adaptation is considered over-permissive when other structures may also be capable of serving the required purpose | Amend paragraph 17.3.7 as follows: “Before support is given for the erection of new buildings for agricultural or ancillary or ordinarily incidental purposes, in order to ensure that the open nature and landscape character of the countryside is maintained, in all cases it will be necessary to demonstrate |

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| | | | | | that there are no other buildings or structures at the farmstead or on the agricultural holding which could, with or without reasonable adaptation, be otherwise used for the proposed purposes.” |
| PA33 | Not Significant | Environment Department revision | Policy OC5(A) | A requirement to demonstrate that no other buildings, solely, are available for adaptation is considered over-permissive when other structures may also be capable of serving the required purpose | Amend 1 st paragraph of draft Policy OC5(A) as follows: “Proposals for development relating to the agricultural use of an existing farmstead or existing agricultural holding, or for a purpose ancillary or ordinarily incidental to the existing primary agricultural use, will be supported where there are no other buildings or structures at the farmstead or on the agricultural holding which could, with or without reasonable adaptation, be otherwise used for the proposed purposes.” |

| Ref. | Change | Source | Para. | Issue | Proposed amendment |
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| Horticulture Outside of the Centres | | | | | |
| PA34 | Not Significant | IR745 | Policy OC6 | Draft Policy OC6 could be more clearly worded and accord better with the text of the preamble | Amend 1 st paragraph of draft Policy OC6 as follows: “Proposals for new glasshouses , extensions, alterations, rebuilding or other works to existing glasshouses or buildings , or ancillary or ordinarily incidental development , associated with existing commercial horticultural holdings will be supported providing...” |
| Redundant Glasshouse Sites Outside of the Centres | | | | | |
| PA35 | Not Significant | IR1279 | 17.5.3 | The original definition meant that draft Policy OC7 could not consider change of use of a current horticultural site before the use of the site had ceased. In considering conversion of an existing building draft Policy GP16(A) requires it to be satisfactorily demonstrated that the building “...is no longer required or capable of being | Amend the definition of “redundant glasshouse site” as follows: <i>“a glasshouse or glasshouses together with ancillary structures and land where the horticultural operation has ceased and the glass and ancillary structures are no longer required or capable of being used for their authorised purpose have fallen out of</i> |

| Ref. | Change | Source | Para. | Issue | Proposed amendment |
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| | | | | used for its current or last known purpose...". A change to the definition of redundant glasshouse site to reflect this wording would be appropriate | authorised use . Often the condition of such structures will deteriorate over time through lack of use and management to leave only partial remnants of structures." |
| PA36 | Not Significant | Environment Department revision | 17.5.6 | There is a lack of consistency throughout the draft Plan when requiring consideration of whether land can contribute positively to commercial agricultural use. Phrasing varies between "cannot", "will not", "does not" and "does not or could not" | Amend paragraph 17.5.6 as follows: "...unless it is successfully demonstrated to the satisfaction of the Environment Department that the cleared site will not cannot positively contribute to the commercial agricultural use of an identified Agriculture Priority Area or cannot practically be used for commercial agriculture without adverse environmental impacts..." |
| PA37 | Not Significant | Environment Department revision | 17.5.7 | There is a lack of consistency throughout the draft Plan when requiring consideration of whether land can contribute positively to commercial agricultural use. Phrasing varies between "cannot", "will not", "does not" and "does not or could not" | Amend paragraph 17.5.7 as follows: "In some circumstances, where it has been demonstrated to the satisfaction of the Environment Department that the cleared site will not cannot positively contribute to commercial agricultural use or cannot practically be used for commercial agricultural use without adverse environmental impacts..." |

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| PA38 | Not Significant | Environment Department revision | 17.5.9 | There is a lack of consistency between proposed amendments to Policy IP1 and this Policy. | <p>Amend paragraph 17.5.9 to the following:</p> <p>The use of redundant glasshouses for installations for the harnessing of renewable energy may also be permissible. This may include proposals for renewable energy infrastructure within the Agriculture Priority Area where such infrastructure is of a design and type that would allow agricultural activity to continue on the site (see Policy IP1: Renewable Energy Production).</p> |
| PA39 | Not Significant | Environment Department revision | 17.5.9 | No reference is made to camping as a potential option for a cleared glasshouse site within the preamble to or wording of draft Policy OC7 | <p>Amend paragraph 17.5.9 to the following:</p> <p>“Provision of camping facilities will be considered, subject to the proposal satisfying Policy OC8(B): Visitor Accommodation Outside of the Centres – Campsites. Outdoor formal recreation development and informal recreation and leisure use will also be considered, subject to the proposal satisfying Policy OC9: Leisure and Recreation Outside of the Centres.”</p> |

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| PA40 | Not Significant | Environment Department revision | Policy OC7 | The wording of criteria a) is not consistent with Policy IP1 | <p>Amend criterion 'a' of the 2nd paragraph of draft Policy OC7 as follows:</p> <p>a. the site is not within or adjacent to an Agriculture Priority Area, unless it is demonstrated to the Environment Department's satisfaction that the site cannot positively contribute to the commercial agricultural use of an identified Agriculture Priority Area or cannot practically be used for commercial agricultural use without adverse environmental impacts or where proposals are for renewable energy infrastructure and the design and type would allow agricultural activity to continue on the site; and, contribute to the commercial agricultural use of an identified Agriculture Priority Area or cannot practically be used for commercial agricultural use without adverse environmental impacts or where proposals are for renewable energy infrastructure and the design and type would allow agricultural activity to continue on the site; and,</p> |
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| Ref. | Change | Source | Para. | Issue | Proposed amendment |
|------|-----------------|---------------------------------|------------|--|---|
| PA41 | Not Significant | Environment Department revision | Policy OC7 | The wording of criterion c makes it sound as if a proposal for development of a redundant glasshouse site must be for industrial, storage and distribution use and could not be used solely for either industrial or storage and distribution purposes | Amend criterion 'c' of the 2 nd paragraph of draft Policy OC7 as follows: "c. the proposal is for small scale industrial, or storage and distribution use and is in accordance with the requirements of Policy OC3: Office, Industry, Storage and Distribution Outside of the Centres; or," |
| PA42 | Not Significant | Environment Department revision | Policy OC7 | No reference is made to camping as a potential option for a cleared glasshouse site within the preamble to or wording of draft Policy OC7 | Amend criterion 'g' of the 2 nd paragraph of draft Policy OC7 as follows: "g. the proposal is for a campsite and is in accordance with Policy OC8: Visitor Accommodation Outside of the Centres – Campsites; or, g-h. h. the proposal is for outdoor formal recreation or informal recreation and leisure and is in accordance with Policy OC9: Leisure and Recreation Outside of the Centres." |

| Ref. | Change | Source | Para. | Issue | Proposed amendment |
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| PA43 | Not Significant | Environment Department revision | Policy OC7 | A caveat requiring proposals to accord with all other policies of the Plan, found in all other relevant policies, is missing | <p>Amend criterion 'iv' of the 3rd paragraph of draft Policy OC7 as follows:</p> <p>"iv. the proposal includes details of an appropriate soft landscaping scheme which will make a positive contribution to the visual quality of the environment and which will sufficiently screen the activities on the site and mitigate impacts;; and,</p> <p>v. the proposal accords with all relevant policies of the Island Development Plan."</p> |

| Visitor Accommodation Outside of the Centres | | | | | |
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| PA44 | Not Significant | Environment Department revision | 17.7.4 | There is a lack of consistency throughout the draft Plan when requiring consideration of whether land can contribute positively to commercial agricultural use. Phrasing varies between “cannot”, “will not”, “does not” and “does not or could not” | Amend paragraph 17.7.4 as follows: “Where a proposal does fall within an Agriculture Priority Area such proposals will be supported where it is successfully demonstrated, to the satisfaction of the Environment Department, that the land does not, or could not, cannot positively contribute to the commercial agricultural use of the Agriculture Priority Area or cannot practicably be used for commercial agriculture without unacceptable adverse environmental impacts.” |

| Ref. | Change | Source | Para. | Issue | Proposed amendment |
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| PA45 | Not Significant | IR641 | 17.7.9 | The wording of paragraph 17.7.9 is not consistent with the policy approach of draft Plan Policies MC8, LC6 and OC8 | Amend paragraph 17.7.9 to the following: “Previously there has been a process of rationalisation of the Island’s stock of visitor accommodation which has been successful in stimulating investment and establishing a sustainable level of accommodation. However, in order to ensure that the Island retains a sufficient level of accommodation to support the visitor economy, meet forecast demand and ensure a range of types of accommodation, there will be a need to resist the further loss of some visitor accommodation establishments other than in exceptional circumstances ”. |
| PA46 | Not Significant | Environment Department revision | Policy OC8(B) | There is a lack of consistency throughout the draft Plan when requiring consideration of whether land can contribute positively to commercial agricultural use. Phrasing varies between “cannot”, “will not”, “does not” and “does not or could not” | Amend criterion ‘a’ of the 1 st paragraph of draft Policy OC8(B) as follows: “a. where a proposal falls within an Agriculture Priority Area it is successfully demonstrated, to the satisfaction of the Environment Department, that the land does not cannot positively contribute to the commercial agricultural use of the Agriculture Priority Area or cannot practicably be used for commercial agriculture without unacceptable adverse environmental impacts; and,” |

18. Spending Leisure Time Outside of the Centres

The Environment Department proposes the following change to this section of the draft Island Development Plan.

| Ref. | Change | Source | Para. | Issue | Proposed amendment |
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| Leisure and Recreation Outside of the Centres | | | | | |
| PA47 | Not Significant | Environment Department revision | Policy OC9 | There is a lack of consistency throughout the draft Plan when requiring consideration of whether land can contribute positively to commercial agricultural use. Phrasing varies between “cannot”, “will not”, “does not” and “does not or could not” | <p>Amend criterion ‘d’ of the 1st paragraph and criterion ‘iii’ of the 3rd paragraph of draft Policy OC9 as follows:</p> <p>“d. the site does not fall within an Agriculture Priority Area, or where it does fall within an Agriculture Priority Area the land does not cannot positively contribute to commercial agricultural use or cannot practically be used as such without adverse environmental impacts.”</p> <p>and:</p> <p>“iii. the site does not fall within an Agriculture Priority Area, or where it does fall within an Agriculture Priority Area the land does not or could not cannot positively contribute to commercial agricultural use or cannot practically be used as such without adverse environmental impacts.</p> <p>Proposals to extend, alter or redevelop existing</p> |

| Ref. | Change | Source | Para. | Issue | Proposed amendment |
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| | | | | | formal outdoor recreation or informal leisure and recreation uses on land adjoining the existing site will be supported providing that the site does not fall within an Agriculture Priority Area, or where it does fall within an Agriculture Priority Area the land does not cannot positively contribute to commercial agricultural use or cannot practically be used as such without adverse environmental impacts and proposals accord with all other relevant policies of the Island Development Plan.” |

19. General Policies

The Environment Department proposes the following changes to this section of the draft Island Development Plan.

| Ref. | Change | Source | Para. | Issue | Proposed amendment |
|---------------------|-----------------|---------------------------------|------------|--|--|
| Protected Monuments | | | | | |
| PA48 | Not Significant | Environment Department revision | Policy GP6 | The definition of protected monuments does not include the word ‘building’ whereas this is used in the wording of draft Policy GP6 | Amend 2 nd paragraph of draft Policy GP6 to the following: “There is a presumption against the demolition or partial demolition of a protected monument and this will only be permitted where it is demonstrated to the satisfaction of the Environment Department |

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| | | | | | that the building protected monument is structurally unsound and is technically incapable of repair and represents a danger to the public so as to outweigh the presumption." |
| Sustainable Development | | | | | |
| PA49 | Not Significant | Environment Department revision | 19.10.8 | Draft Policy GP9 and the supporting text are not consistent with the intentions of draft Policy GP16(B): Conversion of Redundant Buildings - Demolition and Redevelopment | Amend paragraph 19.10.8 as follows: "In order to ensure that appropriate environmental management practises are followed during the demolition and construction phases of projects the Environment Department will require the submission of a Waste Management Plan with a planning application for developments of 5 or more dwellings or for any form of development of a minimum of 1,000 square metres of floor area or where development relates to the demolition and redevelopment of a redundant building or a dwelling which has planning permission to be subdivided or a replacement dwelling on a one for one |

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| | | | | | <p>basis in order to ensure that undue or reasonably avoidable adverse impacts of the demolition and construction of buildings are prevented. This will need to demonstrate to the satisfaction of the Environment Department how waste is to be minimised during the demolition of any existing buildings or structures or during construction on a particular site, how existing materials are to be reused, either on or off site, and how residual waste will be dealt with, including details of its immediate destination if it is proposed to be transported off site.”</p> |
| PA50 | Not Significant | Environment Department revision | Policy GP9 | <p>Paragraph 19.10.3 refers to the quality and sustainability of the materials used. Paragraph 19.10.4 refers to design, layout and orientation of buildings, their form of construction and the materials used. Policy GP9 refers to location, orientation and appearance of the building, the form of construction and its resilience to climate</p> | <p>Amend criterion ‘a’ of the 1st paragraph of draft Policy GP9 to include reference to materials, as follows:</p> <p>“a. they have been designed to take into account the use of energy and resources and any adverse impact on the environment through paying particular regard to the</p> |

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| | | | | | location, orientation and appearance of the building, the form of construction, the materials used and its resilience to climate change and flooding; and,” |
| PA51 | Not Significant | Environment Department revision | Policy GP9 | Draft Policy GP9 and the supporting text are not consistent with the intentions of draft Policy GP16(B): Conversion of Redundant Buildings - Demolition and Redevelopment | <p>Amend 2nd paragraph of draft Policy GP9 to the following:</p> <p>“Development of five or more dwellings or any form of development of a minimum of 1,000 square metres of floor area or where development relates to the demolition and redevelopment of a redundant building or a dwelling which has planning permission to be subdivided, or a replacement dwelling on a one for one basis will require a Waste Management Plan to be submitted with a planning application, which shall demonstrate, to the satisfaction of the Environment Department, how waste associated with the development process is to be minimised, how existing materials are to be reused on or off the site and how residual waste will be dealt with.”</p> |

| Comprehensive Development | | | | | |
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| PA52 | Not Significant | IR860 | Policy GP10 | Draft Policy GP10 could be more clearly worded | <p>Amend 2nd paragraph of draft Policy GP10 to the following:</p> <p>“Proposals will not be supported where their implementation in isolation would not result in compromise the most effective and efficient use of land.”</p> |
| Affordable Housing | | | | | |
| Ref. | Change | Source | Para. | Issue | Proposed amendment |
| PA53 | Significant | FR247 FR270 | 19.12.2 | Housing terms used and defined in the draft Plan required further clarification and amendments, including for consistency with other legislation | <p>Amend paragraph 19.12.2 as follows:</p> <p>“Affordable housing is defined by Section 2(1) of the Land Planning and Development (Planning Covenants) Ordinance, 2011 and is comprised of Social Housing and Intermediate Housing, which are also defined in the Ordinance. In general terms:</p> |

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| | | | | | <ul style="list-style-type: none"> • Social Housing is owned and controlled by the States of Guernsey Housing Department or a registered Housing Association or other person and is generally reserved for households on low incomes and includes specialised housing; • Intermediate Housing is owned and controlled by the States of Guernsey Housing Department or a registered Housing Association or other person and can be offered on a basis that includes part ownership, includes specialised housing (i.e. supported or extra-care housing), partial ownership housing or similar schemes mainly for households that do not qualify for social housing but cannot meet the full cost of renting or buying appropriate housing on the private market without some form of subsidy.” |
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| Ref. | Change | Source | Para. | Issue | Proposed amendment |
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| PA54 | Not Significant | FR101 FR269 | 19.12.8 | After all of the other provisions to support the continued viability of a development, including options concerning mix of type and tenure, on or off site provision, etc., are exhausted, the potential to reduce the headline affordable housing percentage requirement should be considered | Amend paragraph 19.12.8 to the following: “ In exceptional circumstances, t The percentage requirement of this policy may be reduced where it can be demonstrated to the satisfaction of the Environment Department that the application of this policy, including all provisions for options such as those relating to the mix of unit type and tenure and the provision of land or units on or off site to the Housing Department or housing association , the level of affordable housing required, and/or the particular site constraints, would make the development otherwise unviable.” |
| PA55 | Not Significant | IR934 | Policy GP11 | Proposals for the development of 5 or more dwellings are required to provide a proportion of the developable area of the site for affordable housing. The draft Plan is not clear in explaining that this applies to the net increase in units on the site | Amend 1 st paragraph of draft Policy GP11 to the following: “The Environment Department will require proposals for the development resulting in a net increase of 5 or more dwellings to provide a proportion of the developable area of the site for affordable housing in line with the following...” |

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| PA56 | Not Significant | FR101 FR269 | Policy GP11 | After all of the other provisions to support the continued viability of a development, including options concerning mix of type and tenure, on or off site provision, etc., are exhausted, the potential to reduce the headline affordable housing percentage requirement should be considered | Amend 4 th paragraph of draft Policy GP11 as follows: "In exceptional circumstances, w Where the Environment Department is satisfied that the application of this policy, including all provisions for options such as those relating to the mix of unit type and tenure and the provision of land or units on or off site to the Housing Department or housing association, and/or the particular site constraints, would result in it not being viable to proceed with a housing development, the above percentage requirement may be reduced. In these circumstances the Environment Department will consider the circumstances of the particular proposal and will require the maximum percentage of affordable housing provision which is viable for that site, up to the maximum amount identified above.' |
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| | Protection of Housing Stock | | | | |
| PA57 | Significant | IR1015 FR142 | 19.13.3 | There may be exceptional circumstances where a housing site or building is needed to meet an important essential social or community requirement that would override the presumption against loss of existing residential accommodation. There may also be situations where allowing the displacement of housing will facilitate a development with substantial and overriding economic and/or social benefit to the Island which may be considered acceptable providing that replacement housing, of an appropriate type, is located on a suitable alternative site in accordance with the relevant policies of the draft Plan | Amend draft Policy GP12 by adding an additional paragraph after paragraph 19.13.3: "There may also be exceptional circumstances where a site or building is needed to meet an important essential social or community requirement that would override the presumption against loss of existing residential accommodation. There may also be situations where allowing the displacement of housing will facilitate a development with substantial and overriding economic and/or social benefit to the Island which may be considered acceptable providing that replacement housing, of an appropriate type, is located on a suitable alternative site in accordance with the relevant policies of the Island Development Plan. The type of replacement residential units will be expected to reflect the demographic profile of households requiring housing. In establishing this requirement the Environment Department |

| Ref. | Change | Source | Para. | Issue | Proposed amendment |
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| | | | | | will take into consideration the information produced by other States' departments relating to this issue, such as the most recent Housing Needs Survey or any subsequent amended or revised document produced by the Housing Department, the Housing Department's housing waiting lists or any relevant direction by the States of Guernsey." |
| PA58 | Significant | IR1015 FR142 | Policy GP12 | There may be exceptional circumstances where a housing site or building is needed to meet an important essential social or community requirement that would override the presumption against loss of existing residential accommodation. There may also be situations where allowing the displacement of housing will facilitate a development with substantial and overriding economic and/or social benefit to the Island which may be considered acceptable providing that replacement housing, of an appropriate type, is located on a suitable alternative site in accordance with the relevant policies of the draft Plan | Amend 2 nd paragraph of draft Policy GP12 as follows: "The loss of existing housing, or of a building designed for residential use but presently vacant, will only be supported where: a) It can be demonstrated to the satisfaction of the Environment Department that the accommodation is substandard by virtue of its size, location, form of construction or means of access to it and there is no reasonable way of upgrading the accommodation to provide satisfactory living conditions; or b) the site or building is needed to meet an important essential social or community |

| Ref. | Change | Source | Para. | Issue | Proposed amendment |
|-------------------------|-----------------|----------------------------|-------------|---|--|
| | | | | | <p>requirement; or</p> <p>c) the displacement of housing will facilitate a development with substantial and overriding economic and/or social benefit to the Island and where the replacement housing is of an appropriate type, and is located on a suitable alternative site, in accordance with the relevant policies of the Island Development Plan.”</p> |
| Householder Development | | | | | |
| PA59 | Not Significant | IR1096 IR1099 IR1100 | Policy GP13 | There is no link between draft Policy GP13 or the supporting text and draft Policy GP9: Sustainable Development. Paragraph 19.14.8 refers, however, to a requirement that development is in accordance with all the relevant policies of the Island Development Plan. This is not included in draft Policy GP13 | <p>Include as a final paragraph within the policy box of draft Policy GP13:</p> <p>“In all cases, proposals will need to accord with all other relevant policies of the Island Development Plan.”</p> |
| Home Based Employment | | | | | |

| | | | | | |
|-------------------------------------|-----------------|---------------------------------|----------|--|---|
| PA60 | Not Significant | Environment Department revision | 19.15.5 | It should be made clear that the establishing of retail units within the scope of home based employment is considered ancillary to the primary, residential, use of a site and is not deemed to constitute new retail. | Amend paragraph 19.15.5 as follows: “For the avoidance of doubt, any development proposed under this policy is considered to be ancillary to the primary residential use of the site and therefore does not represent new office, retail or industry use in relation to the reference to other relevant policies of the Plan.” |
| Creation and Extension of Curtilage | | | | | |
| PA61 | Not Significant | Environment Department revision | 19.16.11 | There is a lack of consistency throughout the draft Plan when requiring consideration of whether land can contribute positively to commercial agricultural use. Phrasing varies between “cannot”, “will not”, “does not” and “does not or could not” | Amend paragraph 19.16.11 as follows: “Within Agriculture Priority Areas, proposals for new or extensions to existing curtilages will be acceptable where it can be demonstrated to the satisfaction of the Environment Department that the land will not cannot positively contribute to the commercial agricultural use of an Agriculture Priority Area or cannot practicably be used for commercial agriculture within an Agriculture Priority Area without unacceptable adverse environmental impacts...” |

| PA62 | Not Significant | IR1071 | Policy GP15 | Sites of Special Significance and Areas of Biodiversity Importance are mentioned in different parts of the policy including reference to the policies of the draft Plan that are relevant to each designation. This is missing from criterion b. | Include reference to Policy GP3: Areas of Biodiversity Importance within criterion 'b' of the 1 st paragraph of draft Policy GP15, as follows: “...b. it would not have an unacceptable impact on the biodiversity interest of an Area of Biodiversity Importance or, where negative impacts are unavoidable, they can be acceptably mitigated in accordance with a scheme to be agreed with the Environment Department in accordance with Policy GP3: Areas of Biodiversity Importance;... ” |
|------|-----------------|---------------------------------|-------------|--|--|
| Ref. | Change | Source | Para. | Issue | Proposed amendment |
| PA63 | Not Significant | Environment Department revision | Policy GP15 | There is a lack of consistency throughout the draft Plan when requiring consideration of whether land can contribute positively to commercial agricultural use. Phrasing varies between “cannot”, “will not”, “does not” and “does not or could not” | Amend criterion ‘c’ of the 1 st paragraph of draft Policy GP15 as follows: “c. it is demonstrated to the satisfaction of the Environment Department that the land does not or could not cannot positively contribute to the commercial agricultural use of an Agriculture Priority Area or cannot practicably be used for commercial agriculture within an Agriculture Priority Area without unacceptable adverse environmental impacts;...” |

| Conversion of Redundant Buildings | | | | | |
|-----------------------------------|-----------------|---------------------------------|---------|--|---|
| PA64 | Not Significant | Environment Department revision | 19.17.4 | Paragraph 19.17.4 does not allow for convenience retail in coastal locations and so conflicts with draft Policy OC4: Retail Outside of the Centres | <p>Amend paragraph 19.17.4 as follows:</p> <p>“For an existing building to be converted to another use the building must no longer be useful or reasonably capable of being used for its current or last known purpose and the proposal must represent an appropriate use of the building. Those acceptable uses are:</p> <ul style="list-style-type: none"> • Residential; • Social and community; • Industrial; • Storage and distribution; • Convenience retail in coastal locations, in accordance with Policy OC4; • Visitor accommodation; • Office use; • Facilities for Outdoor Formal Recreation or Informal Leisure and Recreation.” |

| Ref. | Change | Source | Para. | Issue | Proposed amendment |
|------|-----------------|---------------------------------|----------|---|---|
| PA65 | Not Significant | Environment Department revision | 19.17.13 | Requiring Building Regulations approval at this stage is considered onerous and unnecessary | <p>Amend paragraph 19.17.13 as follows:</p> <p>“In order to enable the reasonable consideration of development proposals, the demolition and redevelopment of a building that is able to satisfy the requirements of this conversion of redundant buildings policy may be acceptable without the need to implement the permission for conversion by physically carrying out the development, provided that the conversion scheme has first been granted planning permission and Building Regulations approval, that the floor space and volume of the new building is broadly the same as the approved conversion scheme and, in the case of development for residential purposes, the number of units approved in the conversion scheme is not exceeded. In such cases, all other relevant policies of the Island</p> |

| Ref. | Change | Source | Para. | Issue | Proposed amendment |
|------|-----------------|---------------------------------|----------------|--|--|
| | | | | | Development Plan will need to be satisfied.” |
| PA66 | Not Significant | IR934 | 19.17.16 | Proposals for the development of 5 or more dwellings are required to provide a proportion of the developable area of the site for affordable housing. The draft Plan is not clear in explaining that this applies to the net increase in units on the site | Amend paragraph 19.17.16 to the following: “All proposals for conversion of a redundant building, including where this involves demolition and redevelopment as described above, to resulting in a net increase of five or more dwellings are required to provide a proportion of affordable housing in accordance with Policy GP11: Affordable Housing.” |
| PA67 | Not Significant | Environment Department revision | Policy GP16(A) | Draft Policy GP16(A) does not allow for convenience retail in coastal locations and so conflicts with draft Policy OC4: Retail Outside of the Centres | Amend criterion ‘b’ of the 1 st paragraph of draft Policy GP16(A) as follows: “b. the conversion will result in the establishment of either residential, social and community, industrial, storage and distribution, convenience retail in coastal locations in accordance with Policy OC4 , visitor accommodation or office use or provide facilities for outdoor formal recreation or informal leisure and recreation uses; and,” |
| PA68 | Not Significant | IR934 | Policy GP16(A) | Proposals for the development of 5 or more dwellings are required to provide a proportion of the developable area of the site for affordable housing. The draft Plan is not clear | Amend 2 nd paragraph of draft Policy GP16(A) to the following: “All proposals for conversion of a redundant |

| Ref. | Change | Source | Para. | Issue | Proposed amendment |
|------|-----------------|---------------------------------|----------------|--|---|
| | | | | in explaining that this applies to the net increase in units on the site | building to resulting in a net increase of five or more dwellings are required to provide a proportion of affordable housing in accordance with Policy GP11: Affordable Housing.” |
| PA69 | Not Significant | Environment Department revision | Policy GP16(B) | Requiring Building Regulations approval at this stage is considered onerous and unnecessary | Amend criterion ‘a’ of the 1 st paragraph of draft Policy GP16(B) as follows: “The demolition and redevelopment of a building that is able to accord with the requirements of the conversion of redundant buildings policy may be acceptable without the need to implement the permission for conversion by physically carrying out the development, provided that: a. the conversion scheme has first been granted planning permission and Building Regulations approval ; and,” |
| PA70 | Not Significant | IR1096 IR1099 IR1100 | Policy GP16(B) | There is a conflict between criterion c. and criterion e. of draft Policy GP16(B) in terms of acceptable impact on character | For clarity and to be consistent with criterion ‘f’ of draft Policy GP16(A), amend the wording of criterion ‘e’ of the 1 st paragraph of draft Policy GP16(B) as follows: “...it can be demonstrated to the Environment Department's satisfaction that the new building can be constructed in such |

| Ref. | Change | Source | Para. | Issue | Proposed amendment |
|-----------------------------|-----------------|--------|----------------|--|--|
| | | | | | a way as to not have any increased unacceptable adverse impacts on the landscape character or openness of an area...” |
| PA71 | Not Significant | IR934 | Policy GP16(B) | Proposals for the development of 5 or more dwellings are required to provide a proportion of the developable area of the site for affordable housing. The draft Plan is not clear in explaining that this applies to the net increase in units on the site | Amend 4 th paragraph of draft Policy GP16(B) to the following: “All proposals for the demolition and rebuilding of a redundant building which provides resulting in a net increase of five or more dwellings are required to provide a proportion of affordable housing in accordance with Policy GP11: Affordable Housing.” |
| Public Realm and Public Art | | | | | |
| PA72 | Not Significant | IR256 | 19.19.7 | Policy GP18 highlights the need to consider people of all ages and abilities in designing public realm but does not also emphasise the need to take a pan-disability view when considering public art | Amend draft Policy GP18 to the following: “The inclusion of appropriate public art, which takes into account people of all ages and abilities , as an integral part of a proposed new building, development or as a standalone feature within the public realm will be encouraged.” |

20. Infrastructure Policies

The Environment Department proposes the following changes to this section of the draft Island Development Plan.

| Ref. | Change | Source | Para. | Issue | Proposed amendment |
|-----------------------------|-----------------|---------------------------------|------------|---|---|
| Renewable Energy Production | | | | | |
| PA73 | Not Significant | Environment Department revision | 20.2.9 | The requirement that development of greenfield land for renewable energy installations must be limited to subterranean infrastructure only creates a conflict with Policy OC7 in relation to redundant glasshouse sites | Amend paragraph 20.2.9 as follows: “Proposals to develop renewable energy installations on greenfield land, other than redundant glasshouse sites , will generally only be supported where it involves the installation of subterranean renewable energy infrastructure which supports, for example, ground source heat pumps, and would not compromise the ability to utilise the land for agricultural purposes.” |
| PA74 | Not Significant | IR637 IR638 | Policy IP1 | Policy IP1 does not reflect paragraph 20.2.7 in highlighting the potential for the dual use of sites for agriculture and renewable energy | Amend criterion ‘c’ of the 1 st paragraph of draft Policy IP1 to the following: |

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|--|--|--|--|--|---|
| | | | | | <p>“c. the proposals do not involve the development of a redundant glasshouse site, within or adjacent to an Agriculture Priority Area or they do involve such a site but it is successfully demonstrated to the Environment Department's satisfaction that the site cannot positively contribute to the commercial agricultural use of an identified Agriculture Priority Area or cannot practically be used for commercial agricultural use without adverse environmental impacts or the renewable energy infrastructure is of a design and type that would allow agricultural activity to continue on the site;” energy infrastructure is of a design and type that would allow agricultural activity to continue on the site;”</p> |
|--|--|--|--|--|---|

| Ref. | Change | Source | Para. | Issue | Proposed amendment |
|-----------------------------------|-----------------|---------------------------------|------------|---|---|
| PA75 | Not Significant | Environment Department revision | Policy IP1 | The requirement that development of greenfield land for renewable energy installations must be limited to subterranean infrastructure only creates a conflict with Policy OC7 in relation to redundant glasshouse sites | Amend 2 nd paragraph of draft Policy IP1 as follows: “Proposals that involve the development of greenfield land, other than redundant glasshouse sites , will only be supported where the renewable energy infrastructure is subterranean and it can be demonstrated to the satisfaction of the Environment Department that the proposal will not compromise the ability to utilise the land for agricultural purposes.” |
| Solid Waste Management Facilities | | | | | |
| PA76 | Not Significant | Environment Department revision | 20.3.16 | To ensure consistency with draft Policies OC1, GP8 and GP16(B). In order to give proposals for subdivision the opportunity to demolish and rebuild where appropriate in line with current provisions in the Rural Area Plan and consistent with Policy GP16(B). | Amend paragraph 20.3.16 as follows: “In order to ensure that householders and businesses are able to recycle the maximum amount of waste, a requirement to design in recycling facilities in new developments is included in Policy GP8: Design. In order to ensure that appropriate environmental management practices are followed during the demolition and construction phase of projects to demolish and rebuild dwellings on a one for |

| Ref. | Change | Source | Para. | Issue | Proposed amendment |
|------|-----------------|---------------------------------|------------|---|---|
| | | | | | one basis, or to demolish and rebuild redundant buildings or dwellings which have planning permission to be subdivided or where development is for five or more dwellings or for any development of a minimum of 1,000 square metres of floor area, in accordance with the policies of the Island Development Plan relating to those proposals, a Waste Management Plan will be required to be submitted with a planning application. Such a Waste Management Plan shall demonstrate, to the satisfaction of the Environment Department, how waste associated with the development process is to be minimised, how existing materials are to be reused on or off the site, and how residual waste will be dealt with. Where development requires a Development Framework that framework should address issues of waste management and disposal including demolished and excavated material.” |
| PA77 | Not Significant | Environment Department revision | Policy IP2 | Paragraph 20.3.6 identifies Longue Hougue as a suitable location for waste management facilities and does not require consideration under Policy S5: Development of Strategic Importance. Policy IP2 does require waste development at Longue Hougue to be considered under Policy S5 | Amend 4 th paragraph of draft Policy IP2 as follows: “ Other than within the Longue Hougue Key Industrial Area, P proposals for new waste management facilities required as part of the States of Guernsey Waste Strategy will be |

| Ref. | Change | Source | Para. | Issue | Proposed amendment |
|-----------------------------|-----------------|---------------------------------|------------|---|--|
| | | | | | regarded as Development of Strategic Importance (see Policy S5: Development of Strategic Importance).” |
| Airport Related Development | | | | | |
| PA78 | Not Significant | Environment Department revision | Policy IP4 | Paragraph 20.5.6 requires that proposals for development considered under Policy IP4 are in accordance with the Principal Aim, relevant Plan Objectives and General Policies of the Plan. This is not accurately reflected in the wording of Policy IP4 | <p>Amend criterion ‘e’ of the 4th paragraph and criterion ‘h’ of the 5th paragraph of draft Policy IP4 as follows:</p> <p>“e. the proposals accord with the Principal Aim and relevant Plan Objectives and General Policies of the Island Development Plan.”</p> <p>and:</p> <p>“h. the proposals accord with the Principal Aim and relevant Plan Objectives and General Policies of the Island Development Plan.”</p> |

| Transport Infrastructure and Support Facilities | | | | | |
|---|-----------------|---------------------------------|------------|---|---|
| PA79 | Not Significant | IR1285 IR1398 IR1399 | Policy IP6 | Paragraph 20.7.7 is not reflected in Policy IP6. Clarity is required in draft Policy IP6 to explain that the policy seeks to encourage a range of travel options across the Island and does not only relate to the Main Centres and Main Centre Outer Areas | Add, as a new paragraph 3 in draft Policy IP6, as follows: “Throughout the Island, the Environment Department will support proposals for public infrastructure that would assist in providing greater transport choice where these accord with all other relevant policies of the Island Development Plan. New large scale public infrastructure will be considered under Policy S5: Development of Strategic Importance.” |
| Public Car Parking | | | | | |
| PA80 | Not Significant | Environment Department revision | Policy IP8 | It is not clear that the first paragraph of the policy box only applies to Main Centres and Main Centre Outer Areas | Amend 1 st paragraph of draft Policy IP8 to the following: “Within Main Centres and Main Centre Outer Areas, P-proposals for the provision of new public car parks that would result in a net increase in space available to the public, will not be supported unless it forms part of a major, comprehensive development scheme brought forward through a Local Planning Brief for a Harbour Action Area and accords with relevant strategies of the States of Guernsey.” |

| Highway Safety, Accessibility and Capacity | | | | | |
|--|-----------------|----------------|---------|---|--|
| PA81 | Not Significant | IR122 IR699 | 20.10.4 | Paragraph 20.10.4 needs to be consistent with Policy GP1 to reflect the principles of ensuring the proportionate management of development and affording a significant degree of flexibility so that reasonable development aspirations can be met outside of Conservation Areas (paragraphs 19.2.11 and 19.2.12) | Amend paragraph 20.10.4 to the following: “Much of Guernsey’s local distinctiveness is formed by roadside walls, hedges and landscaping, as well as the width of the public highways. Therefore, in considering proposals for enhancements to the existing road network intended to improve road safety and/or pedestrian and cycling accessibility, the Environment Department will seek to ensure that they do not result, wherever possible, in adverse effects upon the character or appearance of an area special interest or character or appearance of a Conservation Area, protected building or protected monument . Elsewhere, to ensure a proportionate management of development, the Environment Department will seek the retention of landscape character or distinctive natural or built features that contribute positively to the character of an area, but will require the value of the landscape character or features on an individual site to be assessed in a wider context of the |

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|------|-----------------|----------------|------------|---|---|
| | | | | | contribution made to the landscape value of a particular locality. In assessing development proposals, the Environment Department will balance any impact on the character of the locality concerned with affording a significant degree of flexibility so that reasonable development aspirations can be met (see Policy GP1: Landscape Character and Open Land).” |
| PA82 | Not Significant | IR122 IR699 | Policy IP9 | Policy IP9 does not reflect paragraph 20.10.4 to highlight the importance to Guernsey’s local distinctiveness of roadside walls, hedges and landscaping outside of Conservation Areas | Amend 2 nd paragraph of draft Policy IP9 to the following: “In considering proposals for enhancement to access of developments or to improvements to the local highway network the Environment Department will seek to ensure, wherever possible, that they do not result in adverse impacts on the special interest or character or appearance of a Conservation Area, protected building or protected monument, or elsewhere, wherever possible, on the landscape character or distinctive natural or built features that contribute positively to the character of the wider area. ” |

21. Monitoring and Review

The Environment Department proposes the following changes to this section of the draft Island Development Plan.

| Ref. | Change | Source | Para. | Issue | Proposed amendment |
|--------------------------|-----------------|---------------------------------|--------|--|--|
| Annual Monitoring Report | | | | | |
| PA83 | Not Significant | Environment Department revision | 21.4.3 | <p>Reference solely to the Housing Needs Survey in relation to assessment of the supply of housing is inaccurate and limiting</p> <p>Housing terms used and defined in the draft Plan required further clarification and amendments, including for consistency with other legislation and proposed legislation and terms used by other States' Departments</p> | <p>Amend the 2nd bullet point of paragraph 21.4.3 to the following:</p> <p>“Housing Monitoring Report – this will highlight the overall housing completions by year and will also review the two year ‘pipeline’ supply of available housing land. Further breakdown will then be provided on market, and affordable and (including specialised) housing and will provide an update to the Strategic Housing Land Availability Assessment. This report will include a review of the delivery of allocated housing sites, the amount of windfall development, the mix of housing and the delivery of affordable housing (including whether delivered on or off-site), reflecting on the viability of housing development in the light of the policy requirement to provide affordable housing, including build costs and yields. The supply of housing in relation to the Housing Needs Survey and any other information provided by the States on the housing requirement will also be assessed;”</p> |

| Ref. | Change | Source | Para. | Issue | Proposed amendment |
|------|-----------------|---------------------------------|--------|--|--|
| PA84 | Not Significant | Environment Department revision | 21.4.3 | Paragraph 21.4.3 requires the Annual Monitoring Report, in reviewing changes in the Local Centres, to refer back to the Sustainability Score Matrix included in the report 'Analysis of Potential Local Centres' of June 2013. Greater flexibility would be beneficial | Amend the 5 th bullet point of paragraph 21.4.3 to the following: "Local Centres Sustainability – a review of any changes in the services and facilities available in the Local Centres against the Sustainability Score Matrix included in the 'Analysis of Potential Local Centres' report, June 2013; " |

Annex I: Amenities

The Environment Department does not propose any change to this section of the draft Island Development Plan.

Annex II: Sites Allocated as Housing Sites

The Environment Department does not propose any change to this section of the draft Island Development Plan.

Annex III: Development Frameworks and Local Planning Briefs

The Environment Department proposes the following change to this section of the draft Island Development Plan.

| Ref. | Change | Source | Para. | Issue | Proposed amendment |
|------|----------------------------------|---------------|-------|--|--|
| | What is a Development Framework? | | | | |
| PA85 | Not Significant | IR420 FR42 | III.7 | Annex III, in paragraph III.7, needs to provide more clarity on the process relating to the production of Development Frameworks | Amend paragraph III.7 to the following: “A Development Framework would normally be prepared by the Environment Department although in some circumstances the Environment Department will consider one prepared on behalf of a prospective developer (guidance should be sought from the Environment Department in this regard prior to commencing work on a Development Framework). In such circumstances the Development Framework would still require Environment Department approval. Once approved, a Development Framework will be taken into account by the Environment Department when considering planning applications for the site to which it relates. Where a Development Framework has been approved, the Environment Department will expect proposals to accord with it. There can be more than one Development Framework relating to a site.” |

Annex IV: Regeneration Areas

The Environment Department does not propose any change to this section of the draft Island Development Plan.

Annex V: Landscape Character

The Environment Department does not propose any change to this section of the draft Island Development Plan.

Annex VI: Sites of Special Significance

The Environment Department proposes the following change to this section of the draft Island Development Plan

| | Change | Source | Para. | Issue | Proposed amendment |
|------|-----------------|---------------------------------|-------|--|---|
| PA86 | Not Significant | Environment Department revision | Map 1 | The names in the legend of Map 1 do not reflect the Sites of Special Significance listed within the draft Plan | <p>Amend the legend of Map 1 to reflect the wording for Sites of Special Significance listed within the draft Plan as follows:</p> <p>“1. Cliffs 2. Fort Hommet headland & Vazon Coast 3. La Claire Mare, Lihou, and L’Eree La Rousse Mare, etc. 4. L’Ancresse Common 5. Les Vicheries & La Rue Rocheuse 6. Lihou Island 7. Cobo to Vale Church Port Soif to Pont du Valle 8. South Vazon/ & La Grande Mare wet meadows 9. St Sampson’s Marais/Ivy Castle & Château des Marais”</p> |

Annex VII: Conservation Areas

The Environment Department does not propose any change to this section of the draft Island Development Plan.

Annex VIII: Archaeological Assessment

The Environment Department does not propose any change to this section of the draft Island Development Plan.

Annex IX: Public Safety Areas

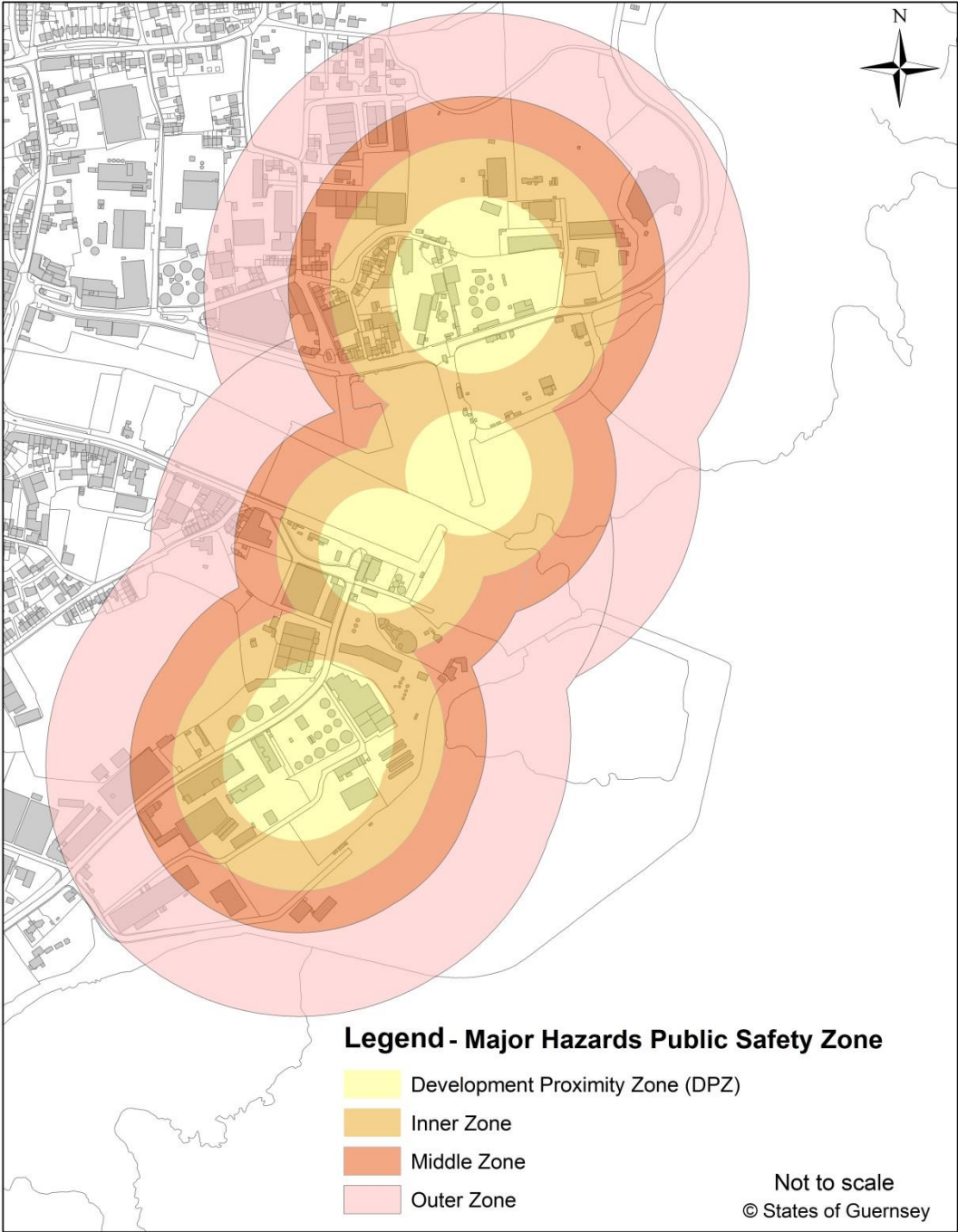
The Environment Department proposes the following change to this section of the draft Island Development Plan.

| Ref. | Change | Source | Para. | Issue | Proposed amendment |
|------|--------------------|---------------------------------|-------|--|---|
| PA87 | Significant | Environment Department revision | IX.14 | Since drafting of the Island Development Plan, the boundaries of the Major Hazards Development Proximity Zone and Consultation Distances have been altered | Amend paragraph IX.14 to the following: “Following the Buncefield incident in 2005 in the United Kingdom, an additional zone known as the Development Proximity Zone has been introduced around large-scale petrol storage sites. The Development Proximity Zone is located within the inner zone and extends up to 150m from the boundary of the relevant storage tank bunds has been identified for each site including their jetties. ” |
| PA88 | Significant | Environment Department revision | IX.15 | Since drafting of the Island Development Plan, the boundaries of the Major Hazards Development Proximity Zone and | Amend paragraph IX.15 to the following: “Therefore the Major Hazards Public Safety Zone identified is compiled of the three Consultation Distances and the Development Proximity Zone, which have been specifically |

| Ref. | Change | Source | Para. | Issue | Proposed amendment | |
|------|--------|--------|-------|--|---|------------------------------|
| | | | | Consultation Distances have been altered | identified for these sites based on information from the Health and Safety Executive as shown on Map 4 and detailed in the table below. | |
| | | | | | Bulwer Avenue, Main Site | |
| | | | | | DPZ | <90m (from tank centres) |
| | | | | | Inner Zone | <150m (from tank centres) |
| | | | | | Middle Zone | <200m (from tank centres) |
| | | | | | Outer Zone | <300m (from tank centres) |
| | | | | | | |
| | | | | | Jetty | |
| | | | | | DPZ | <75m (from unloading point) |
| | | | | | Inner Zone | <125m (from unloading point) |
| | | | | | Middle Zone | <175m (from unloading point) |
| | | | | | Outer Zone | <275m (from unloading point) |
| | | | | | | |
| | | | | | Northside Vale, Main Site | |
| | | | | | DPZ | <100m (from tank centres) |
| | | | | | Inner Zone | <170m (from tank centres) |
| | | | | | Middle Zone | <220m (from tank centres) |
| | | | | | Outer Zone | <320m (from tank centres) |
| | | | | | | |
| | | | | | Jetty | |
| | | | | | DPZ | <75m (from unloading point) |

| Ref. | Change | Source | Para. | Issue | Proposed amendment | |
|------|-----------------|---------------------------------|-----------|--|--|-------------------------------|
| | | | | | Inner Zone | <125m (from unloading point) |
| | | | | | Middle Zone | <175m (from unloading point) |
| | | | | | Outer Zone | <275m (from unloading point)" |
| PA89 | Not significant | Environment Department revision | IX15-IX20 | Paragraphs require to be renumbered following the insertion of the table as part of paragraph IX.15 | <p>Amend paragraph numbering so that the second part of paragraph IX.15 becomes paragraph IX.16 as follows: "The areas shown are indicative of the known areas at the time of writing of the Island Development Plan however, it is acknowledged that these could change or may need to be altered or additional areas be identified during the lifetime of the Island Development Plan. If area boundaries are altered or new areas identified these will be published by the Environment Department in Supplementary Planning Guidance."</p> <p>Renumber paragraphs IX.16 to IX.20 as paragraphs IX.17 to IX.21.</p> | |
| PA90 | Significant | Environment Department revision | Map 4 | Since drafting of the Island Development Plan, the boundaries of the Major Hazards Development Proximity Zone and Consultation Distances have been altered | Amend the boundaries on Map 4: Major Hazards Public Safety Zone around fuel storage sites at Bulwer Avenue, St Sampson and Northside, Vale to accord with updated Health and Safety Executive advice. See amended Map 4 below. | |

Amended Map 4: Major Hazards Public Safety Zone around fuel storage sites at Bulwer Avenue, St Sampson and Northside, Vale (Based on information from the Health and Safety Executive)



Glossary

The Environment Department proposes the following changes to this section of the draft Island Development Plan.

| Ref. | Change | Source | Para. | Issue | Proposed amendment |
|------|-----------------|----------------|-------------------------------|--|---|
| PA91 | Not Significant | FR247 FR270 | Affordable housing definition | Housing terms used and defined in the draft Plan require further clarification and amendments, including for consistency with other legislation, and terms used by other States' Departments | Amend the definition of "Affordable housing" as follows: "Affordable housing is defined by Section 2(1) of the Land Planning and Development (Planning Covenants) Ordinance, 2011. In general terms, affordable housing is for those households whose needs are not met by, or who cannot afford, accommodation in the private sale or rental market without assistance. It is normally provided through the Housing Department or Guernsey a registered Housing Association." |

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|------|-----------------|----------------|--|---|--|
| PA92 | Not Significant | IR882 IR41 | Key Industrial Expansion Area definition | <p>The description of Key Industrial Expansion Areas is factually incorrect</p> <p>For completeness, the revised wording of the Glossary for Key Industrial Expansions Areas should include a reference to Policy OC3</p> | <p>Amend the definition of “Key Industrial Expansion Area” as follows:</p> <p>"Key Industrial Expansion Areas are located identified on land adjacent to the Key Industrial Areas and at La Villiaze, Forest as shown on the Proposals Map. See Policy MC5(A): Industry, Storage and Distribution Uses in Main Centres and Main Centre Outer Areas - Within Key Industrial Areas and Key Industrial Expansion Areas and; Policy MC5(B): Industry, Storage and Distribution Uses in Main Centres and Main Centre Outer Areas - Outside of the Key Industrial Areas and Key Industrial Expansion Areas and Policy OC3: Offices, Industry and Storage and Distribution Outside of the Centres."</p> |
| PA93 | Significant | FR247 FR270 | Intermediate housing definition | <p>Housing terms used and defined in the draft Plan require further clarification and amendments, including for consistency with other legislation, and terms used by other States’ Departments.</p> | <p>Amend the definition of “Intermediate housing” as follows:</p> <p>“Intermediate housing is defined by Section 2(1) of the Land Planning and Development (Planning Covenants) Ordinance, 2011. In general terms, it is owned or controlled by the Housing Department, registered Housing Association or any other person or legal arrangement and can be offered on a basis that includes part ownership. For example, it includes specialised housing,</p> |

| | | | | | partial ownership housing, shared equity or low cost ownership or similar schemes mainly for households that are ineligible for social housing but cannot meet the full cost of renting or buying appropriate housing on the private market without some form of subsidy. Partial ownership housing, shared equity or low cost ownership or similar schemes are schemes where eligible households can purchase a dwelling or a share of a dwelling below the market rate." |
|------|-----------------|---------------------------------|-------------------------------|---|--|
| Ref. | Change | Source | Para. | Issue | Proposed amendment |
| PA94 | Not Significant | Environment Department revision | Protected Monument definition | No definition for "protected monument" included within Glossary | <p>Include a definition for "Protected monument" as follows:</p> <p>"Has the meaning in Schedule 2 of the Land Planning and Development (Guernsey) Law, 2005. It comprises monuments, structures, artefacts, caves, ruins and remains which are of archaeological, historic, traditional, artistic or other special interest and which are listed on the protected monuments list. The special interest of protected monuments is taken into consideration in the Island Development Plan and under the Law."</p> |

| | | | | | |
|------|-----------------|--------|---------------------------------|---|---|
| PA95 | Not Significant | IR1279 | Redundant glasshouse definition | <p>The original definition meant that draft Policy OC7 could not consider change of use of a current horticultural site before the use of the site had ceased.</p> <p>In considering conversion of an existing building draft Policy GP16(A) requires it to be satisfactorily demonstrated that the building "...is no longer required or capable of being used for its current or last known purpose...". A change to the definition of redundant glasshouse site to reflect this wording would be appropriate</p> | <p>Amend the definition of "redundant glasshouse site" as follows:</p> <p>"A glasshouse or glasshouses together with <i>ancillary</i> structures and land where the <i>horticultural</i> operation has ceased and the glass and <i>ancillary</i> structures are no longer required or capable of being used for their authorised purpose have fallen out of authorised use . Often the condition of such structures will deteriorate over time through lack of use and management to leave only partial remnants of structures. Redundant Rglasshouse sites are required to be treated as agricultural land under planning legislation."</p> |
|------|-----------------|--------|---------------------------------|---|---|

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|------|-----------------|----------------|--------------------------------|---|---|
| PA96 | Not Significant | FR247 FR270 | Social housing definition | Housing terms used and defined in the draft Plan require further clarification and amendments, including for consistency with other legislation, and terms used by other States' Departments | Amend the definition of "Social housing" as follows: "Social housing is defined by Section 2(1) of the Land Planning and Development (Planning Covenants) Ordinance, 2011. In general terms, Social Housing is owned and controlled by the Housing Department or a registered Housing Association or any other person or legal arrangement and is reserved for households on low incomes or with other needs identified by the Housing Department. " |
| PA97 | Significant | FR247 FR270 | Specialised housing definition | Housing terms used and defined in the draft Plan require further clarification and amendments, including for consistency with other legislation and proposed legislation, and terms used by other States' Departments | Amend the definition of "Specialised housing" as follows: Specialised housing is housing units with care provided to residents such as extra care accommodation, nursing and residential homes and other accommodation for people in need of care. Generally, care staff operate on-site and residents tend to live in single room accommodation. and/or support needs or |

| Ref. | Change | Source | Para. | Issue | Proposed amendment |
|------|-----------------|----------------|------------------------|---|--|
| | | | | | sheltered housing schemes ; typically, the owner of the properties is responsible for maintenance and management and the States of Guernsey is responsible for the provision of care and support. |
| PA98 | Not Significant | FR247 FR270 | Supported housing def. | The term “supported housing” is not referred to in the draft Plan | Remove the definition of “Supported housing” from the draft Plan. |

Proposals Map

The Environment Department proposes the following changes to the draft Proposals Map.

A map showing the location of proposed mapping amendments, accompanied by a suite of inset maps which indicate the proposed spatial changes to allocations and designations, is provided in Annex II and will supplement the changes set out in the following table. Numbers within the table correspond to changes identified on the Location of Proposed Mapping Amendments map and the relevant inset map.

| Ref. | Change | No. | Source | Designation | Issue | Proposed amendment |
|------|-----------------|-----|---------------------------------|--------------------------------------|--|--|
| PA99 | Not Significant | 1 | Environment Department revision | Main Centre Outer Area: St Sampson's | The Harbour Action Area in this location extends beyond the Main Centre Outer Area | Reposition the north eastern extent of the Main Centre Outer Area at the Bridge toward the east (part of Castle Road, car park and eastern part of C00446C000) and amend the angle of the boundary line to the south east to reconcile boundaries. |

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|-------|--------------------|---|---------------------------------|------------------------------------|---|---|
| PA100 | Significant | 2 | IR126 | Housing Allocation: La Vrangue | The southern portion of the site referred to in the representation is within the Main Centre Outer Area boundary designation and adjoins La Vrangue Housing Allocation. Its development and potential additional access to La Vrangue Housing Allocation from La Ramee could be of significant benefit | Amend La Vrangue Housing Allocation to include the southern portion of the subject site (A101590000) |
| PA101 | Significant | 3 | IR153 | Key Industrial Area: Longue Hougue | The domestic property, Mont du Herissaon, St Sampson's Church Hall (a protected building in community use) and Swan House (constrained access) should be omitted from Longue Hougue Key Industrial Area in the draft Island Development Plan. The sites do not have direct access onto the Inter Harbour Route and are outside of the existing Key Industrial Area in the Urban Area Plan | Amend the boundary of the Longue Hougue Key Industrial Area to omit the domestic property highlighted in the representation, St Sampson's Church Hall and Swan House (B00163A000, B001640000 & B001790000 respectively) |
| PA102 | Not Significant | 4 | Environment Department revision | Core Retail Area: St Peter Port | Core Retail Area boundary does not accord with boundaries on the ground | Amend the boundary of the Core Retail Area to include the identified site (A113470000) |

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|-------|-----------------|---|---------------------------------|-------------------------------------|---|---|
| PA103 | Not Significant | 5 | Environment Department revision | Harbour Action Areas: St Peter Port | The Harbour Action Area extends south of the Main Centre Outer Boundary | Amend the Harbour Action Area to be contained to the north of the Main Centre Outer Area boundary at La Vallette to reconcile boundaries. |
|-------|-----------------|---|---------------------------------|-------------------------------------|---|---|

| Ref. | Change | No. | Source | Designation | Issue | Proposed amendment |
|-------|-----------------|-----|---------------------------------|-------------------------------------|--|--|
| PA104 | Not Significant | 6 | Environment Department revision | Harbour Action Areas: St Peter Port | The Harbour Action Area extends north of the Main Centre Inner Boundary | Amend the Harbour Action Areas to be contained to the south of the Main Centre Inner Boundary at La Salerie to reconcile boundaries. |
| PA105 | Not Significant | 7 | Environment Department revision | Harbour Action Areas: St Sampson's | The Harbour Action Area extends north east of the Main Centre Outer Boundary | Amend the Harbour Action Area to be contained to the south west of the amended Main Centre Outer Boundary at Castle Road to reconcile boundaries – see proposed map amendment 1. |

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|-------|-----------------|---|---------------|-----------------------------------|--|---|
| PA106 | Not Significant | 8 | IR1374 | Harbour Action Area: St Sampson's | St Sampson's Church, adjoins the graveyard and Church House and is excluded from the draft Harbour Action Area. The graveyard and Church House are more closely associated with St Sampson's Church than the harbour area generally. Removal from the Harbour Action Area would not prejudice the comprehensive and coordinated development of the area | Amend the boundary of the St Sampson's Harbour Action Area to omit the graveyard and Church House (B003570000 & B003560000) |
| PA107 | Not Significant | 9 | IR97 IR107 | Agriculture Priority Area | The land identified in this representation largely relates to the curtilage of a domestic dwelling and the adjacent land to the west falls outside of the Agriculture Priority Area. Due to the layout of the site, its relationship with adjoining land and that similar land to the west has not been designated as an Agriculture Priority Area, it is considered that the identified site could not be legitimately seen as being part of or contributing to a larger tract of agricultural land and is unlikely to contribute to or be required for commercial agriculture in the future. | Amend the boundary of the Agriculture Priority Area to omit the identified site (E00864A000) |

| Ref. | Change | No. | Source | Designation | Issue | Proposed amendment |
|-------|--------------------|-----|---------------------------------|---------------------------|---|---|
| PA108 | Not Significant | 10 | Environment Department revision | Agriculture Priority Area | Agriculture Priority Area boundary does not accord with boundaries/lines of sight on the ground | Amend boundary of the Agriculture Priority Area to exclude the identified site (G000690000) |
| PA109 | Significant | 11 | IR393 | Agriculture Priority Area | The land identified in this representation forms part of the Best and Most Versatile agricultural land and adjoins the boundary of the proposed Agriculture Priority Area. Due to the layout of the site, its relationship with adjoining land and that similar land to the south has been designated as an Agriculture Priority Area, it is considered that the identified site could be legitimately seen as being part of, or contributing to, a larger tract of agricultural land | Amend the boundary of the Agriculture Priority Area to include the identified site (F014340000) |
| Ref. | Change | No. | Source | Designation | Issue | Proposed amendment |
| | | | | | and could contribute to or be required for commercial agriculture in the future and was omitted from the Agriculture Priority Area in error. | |

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|-------|--------------------|----|---------------------------------|---------------------------|--|--|
| PA110 | Significant | 12 | FR140 | Agriculture Priority Area | The parcel of land to the north west of the Agriculture Priority Area at Le Villocq was previously overlooked in identifying the APAs through applying the methodology for identifying the Agriculture Priority Area and was omitted in error. | Amend the boundary of the Agriculture Priority Area to include the identified sites (D01665A004 & D016820000) |
| PA111 | Significant | 13 | Environment Department revision | Agriculture Priority Area | Following a further check on the tracts of land falling within the 30 vergée threshold set by the Environment Department and applying the methodology for identifying the Agriculture Priority Area, additional land parcels are included within the Agriculture Priority Area which were omitted in error. The land identified adjoins the boundary of the proposed Agriculture Priority Area. Due to the layout and relationship with adjoining land, it is considered that the identified site could be legitimately seen as being part of, or contributing to, a larger tract of agricultural land and could | Amend the boundary of the Agriculture Priority Area to include the identified site (C008610000, C00853H000, C012430000, C015790000, C015780000, C015770000 & C015730000) |

| Ref. | Change | No. | Source | Designation | Issue | Proposed amendment |
|-------|--------------------|-----|---------------------------------|---------------------------|---|---|
| | | | | | contribute to or be required for commercial agriculture in the future. | |
| PA112 | Significant | 14 | Environment Department revision | Agriculture Priority Area | Following a further check on the tracts of land falling within the 30 vergée threshold set by the Environment Department and applying the methodology for identifying the Agriculture Priority Area, additional land parcels are included within the Agriculture Priority Area which were omitted in error. The land identified adjoins the boundary of the proposed Agriculture Priority Area. Due to the layout and relationship with adjoining land, it is considered that the identified site could be legitimately seen as being part of, or contributing to, a larger tract of agricultural land and could contribute to or be required for commercial agriculture in the future. | Amend the boundary of the Agriculture Priority Area to include the identified site (J01387A000, J013670000, J013710000, J013770000 & J013830000) |
| PA113 | Significant | 15 | Environment Department revision | Agriculture Priority Area | Following a further check on the tracts of land falling within the 30 vergée threshold set by the Environment Department and applying the methodology for identifying the Agriculture Priority Area, additional land parcels are included within the | Amend the boundary of the Agriculture Priority Area to include the identified site (G00243A000, G002430000, G002650000, G002660000, G002420000, G002550000, G002560000, G002590000, G002600000, |

| Ref. | Change | No. | Source | Designation | Issue | Proposed amendment |
|-------|-----------------|-----|---------------------------------|---------------------------------------|--|--|
| | | | | | Agriculture Priority Area which were omitted in error. The land identified adjoins the boundary of the proposed Agriculture Priority Area. Due to the layout and relationship with adjoining land, it is considered that the identified site could be legitimately seen as being part of, or contributing to, a larger tract of agricultural land and could contribute to or be required for commercial agriculture in the future. | G002610000, G002620000, G002630000, G00264A000, G00318A000, G003190000, G00320A000, G003200000, G003210000, G002570000, G002410000, G002400000, G002580000, G002380000, G002360000, G00236A000, G002340000, G002330000, G002320000, G00232A000, G00148A000, G00148B000, G001480000, G00232B000, G001500000, G001520000 & G001530000) |
| PA114 | Not Significant | 16 | Environment Department revision | Agriculture Priority Area | The King Edward VII Hospital is largely covered by buildings and associated structures and has a stronger relationship with the more built up area to the north than agricultural land to the south. It would not contribute to commercial agriculture in the future. | Amend the boundary of the Agriculture Priority Area to exclude the identified site (D008810000) |
| PA115 | Not Significant | 17 | IR1046 | Sites of Special Significance: Cliffs | The area highlighted forms part of the gardens for Trinity Cottages. Designating residential buildings and associated grounds or curtilages as Sites of Special Significance is | Amend the boundary of the Cliffs Site of Special Significance to omit the garden area highlighted in the representation (G006080002 & G006080003) |

| Ref. | Change | No. | Source | Designation | Issue | Proposed amendment |
|-------|--------------------|-----|---------------------------------|---|---|--|
| | | | | | considered unnecessarily and unreasonably restrictive to owners of those buildings or on works that may need to occur in these areas. | |
| PA116 | Not Significant | 18 | Environment Department revision | Areas of Biodiversity Importance: Northside | The Harbour Action Area, in places, extends beyond the Main Centre Outer Areas but does not meet the Area of Biodiversity Importance | Amend the boundary of the Area of Biodiversity Importance to encompass road and small area of grassland (C00446C000) to reconcile boundaries. |
| PA117 | Not Significant | 19 | Environment Department revision | Areas of Biodiversity Importance: Delancey Lane | The Area of Biodiversity Importance includes paved gardens, buildings and car parking | Amend the boundary of the Area of Biodiversity Importance to exclude car parking, garden and buildings (B005770006, B005770005, B005770003, B005750000 & B005770002) |
| PA118 | Significant | 20 | IR125 | Conservation Area: 1. St Peter Port | La Vallette Bathing Pools are an important feature of the St Peter Port Conservation Area but are excluded from the draft designation | Amend the boundary of the Conservation Area designation to include La Vallette Bathing Pools (A41111A000 and adjacent Horseshoe Pool) |
| PA119 | Not Significant | 21 | FR25 FR137 | Conservation Area: 2. The Bridge | Conservation Area boundary does not accord with changes in topography on the ground | Reposition boundary toward the east (B00305C000, B00305D000 & B00305A000) |
| PA120 | Not Significant | 22 | Environment Department revision | Conservation Area: 2. The Bridge | Conservation Area boundary does not accord with changes in topography on the ground | Reposition boundary toward the south and west (B00354B000) |

| Ref. | Change | No. | Source | Designation | Issue | Proposed amendment |
|-------|--------------------|-----|---------------------------------|---|--|--|
| PA121 | Not Significant | 23 | Environment Department revision | Conservation Area: 11. King's Mills | Conservation Area boundary does not accord with boundaries/lines of sight on the ground | Reposition boundary toward the south (D003250000, D003240000 & D00316A002) and toward the north (D00317A000 & D00318A000) |
| PA122 | Not Significant | 24 | IR648 | Conservation Area: 22. St Martin's Church and Sausmarez Manor | Land subject of the representation is clearly associated with La Michele Hotel and does not contribute to the character of the Conservation Area | Amend the boundary of the Conservation Area to exclude La Michele Hotel in its entirety (J00234B000) |
| PA123 | Significant | 25 | Environment Department revision | Conservation Area: 22. St Martin's Church and Sausmarez Manor | Land and buildings associated with Les Blanches Pierres contribute to the character of the Conservation Area but are omitted from the designation | Amend the boundary of the Conservation Area to include Les Blanches Pierres and wing (J000580000 & J00058A000) |
| PA124 | Significant | 26 | FR202 | Safeguarded Areas: Airport | The Safeguarded Area designation should follow land parcel boundaries, where possible, or a line of sight between two identifiable features in order that the lines can be easily translated on the ground | Amend the boundary of the Airport Safeguarded Area towards the north (K00390A000, K00389B000, H006470000, H006490000, H006500000 & H00651A000), towards the east (H006550000, H00652B000, H00652A000 & H006570000) and towards the south (H006430000, H006420000 & H006440000) |

Supplementary Planning Guidance

The Environment Department proposes the following changes to the Supplementary Planning Guidance.

| Source | Para. | Issue | Proposed amendment |
|--------------------|-------|--|---|
| Affordable Housing | | | |
| FR247 FR270 | 2.2 | Housing terms used and defined in the draft Plan required further clarification and amendments, including for consistency with other legislation | <p>Amend paragraph 2.2 as follows:</p> <p>“Affordable housing is defined by Section 2(1) of the Land Planning and Development (Planning Covenants) Ordinance, 2011 and is comprised of Social Housing and Intermediate Housing, which are also defined in the Ordinance. In general terms:</p> <ul style="list-style-type: none"> • Social Housing is owned and controlled by the States of Guernsey Housing Department or a registered Housing Association or other person and is generally reserved for households on low incomes and includes specialised housing; • Intermediate Housing includes specialised housing (i.e. supported or extra care housing), is owned and controlled by the States of Guernsey Housing Department or a registered Housing Association or other person and can be offered on a basis that includes partial ownership housing or similar schemes mainly for households that do not qualify for social housing but cannot |

| | | | meet the full cost of renting or buying appropriate housing on the private market without some form of subsidy.” |
|--------|-------|---|--|
| Source | Para. | Issue | Proposed amendment |
| IR934 | 6.1 | A copy of draft Policy GP11: Affordable Housing is included within this document. Proposals for the development of 5 or more dwellings are required to provide a proportion of the developable area of the site for affordable housing. The document is not clear in explaining that this applies to the net increase in units on the site | In line with changes proposed to the draft Plan, amend this reference to draft Policy GP11 to the following: “The Environment Department will require proposals for the development resulting in a net increase of 5 or more dwellings to provide a proportion of the developable area of the site for affordable housing in line with the following...” |
| FR101 | 6.1 | A copy of draft Policy GP11: Affordable Housing is included within this document. After all of the other provisions to support the continued viability of a development, including options concerning mix of type and tenure, on or off site provision, etc., are exhausted, the potential to reduce the headline affordable housing percentage requirement should be considered | In line with changes proposed to the draft Plan, amend this reference to draft Policy GP11 to the following: “In exceptional circumstances, w Where the Environment Department is satisfied that the application of this policy, including all provisions for options such as those relating to the mix of unit type and tenure and the provision of land or units on or off site to the Housing Department or housing association, and/or the particular site constraints , would result in it not being viable to proceed with a housing development, the above percentage |

| Source | Para. | Issue | Proposed amendment |
|----------------|-------|--|--|
| | | | requirement may be reduced. In these circumstances the Environment Department will consider the circumstances of the particular proposal and will require the maximum percentage of affordable housing provision which is viable for that site, up to the maximum amount identified above." |
| IR934 FR101 | 6.2 | <p>Proposals for the development of 5 or more dwellings are required to provide a proportion of the developable area of the site for affordable housing. The document is not clear in explaining that this applies to the net increase in units on the site</p> <p>The example of how Policy GP11 might be applied in practise is considered to not be representative enough to illustrate the operation of the policy in practice</p> | <p>Amend paragraph 6.2 to the following:</p> <p>"In summary, the affordable housing policy requires housing proposals resulting in a net increase of 5 or more dwellings to contribute toward affordable housing. For example, proposals of 5 or more dwellings (but fewer than 10 dwellings), would be required to provide 20% of the developable part of the site land for 1 affordable dwelling (or 1 completed dwelling where the provision of land is not feasible). Proposals of 10 or more dwellings (but fewer than 15) would be required to provide 20% of the developable part of the site land for 2 affordable dwellings (or 2 completed dwellings where the provision of land is not feasible). The percentage contribution required will be rounded down to the nearest whole unit in each case."</p> |
| FR101 | 10.1 | After all of the other provisions to support the continued viability of a development, including options concerning mix of type and tenure, on or off site provision, etc., are exhausted, the potential to reduce the headline affordable | <p>Amend paragraph 10.1 to the following:</p> <p>"In exceptional circumstances, tThe percentage requirement of Policy GP11 may be reduced where it can be demonstrated to the satisfaction of the Environment</p> |

| Source | Para. | Issue | Proposed amendment |
|----------------|----------|--|--|
| | | housing percentage requirement should be considered | Department that the application of this policy, including all provisions for options such as those relating to the mix of unit type and tenure and the provision of land or units on or off site to the Housing Department or housing association, the level of affordable housing required, and/or the particular site constraints, would make the development otherwise unviable...” |
| FR247 FR270 | 11.5 | Housing terms used and defined in the draft Plan required further clarification and amendments, including for consistency with other legislation | Amend paragraph 11.5 as follows: “Specialised housing such as extra care accommodation or sheltered housing schemes , nursing and residential homes and other accommodation for people in need of care , are brought forward from time to time on the Island. Generally, care staff operate on-site and residents tend to live in single room accommodation. Typically, the owner of the properties are responsible for their maintenance and management and the States of Guernsey is responsible for the provision of care and support. ” |
| FR247 FR270 | Glossary | Housing terms used and defined in the draft Plan required further clarification and amendments, including for consistency with other legislation | Amend definition of “Affordable housing” as follows: “Affordable housing is defined by Section 2(1) of the Land Planning and Development (Planning Covenants) Ordinance, 2011. In general terms, affordable housing is for those households whose needs are not met by, or who cannot afford, accommodation in the private sale or rental market without assistance. It is normally provided through |

| Source | Para. | Issue | Proposed amendment |
|----------------|------------|--|---|
| | | | the Housing Department or Guernsey a registered Housing Association. " |
| FR247 FR270 | Glossary | Housing terms used and defined in the draft Plan required further clarification and amendments, including for consistency with other legislation | Amend definition of "Intermediate housing" as follows: "Intermediate housing is defined by Section 2(1) of the Land Planning and Development (Planning Covenants) Ordinance, 2011. In general terms, it is owned or controlled by the Housing Department, registered Housing Association or any other person or legal arrangement and can be offered on a basis that includes part ownership. For example, it includes specialised housing, partial ownership housing, shared equity or low cost ownership or similar schemes mainly for households that are ineligible for social housing but cannot meet the full cost of renting or buying appropriate housing on the private market without some form of subsidy. Partial ownership housing, shared equity or low cost ownership or similar schemes are schemes where eligible households can purchase a dwelling or a share of a dwelling below the market rate." |
| IR415 | Appendix 1 | Few sites are big enough to be assessed in hectares, other than in small fractions of a hectare. Acres would be preferable. The housing market uses acres and vergées on land values | Amend Appendix 1 Viability Pro-forma to include acres |
| FR247 FR270 | Glossary | Housing terms used and defined in the draft Plan required further clarification and | Amend definition of "Social housing" as follows: |

| Source | Para. | Issue | Proposed amendment |
|---|------------------------------|--|--|
| | | amendments, including for consistency with other legislation | “Social housing is defined by Section 2(1) of the Land Planning and Development (Planning Covenants) Ordinance, 2011. In general terms, Social Housing is owned and controlled by the Housing Department or a registered Housing Association or any other person or legal arrangement and is reserved for households on low incomes or with other needs identified by the Housing Department. ” |
| FR247 FR270 | Glossary | Housing terms used and defined in the draft Plan required further clarification and amendments, including for consistency with other legislation | Amend definition of “Specialised housing” as follows: Specialised housing is housing units with care provided to residents such as extra care accommodation, nursing and residential homes and other accommodation for people in need of care. Generally, care staff operate on-site and residents tend to live in single room accommodation. and/or support needs or sheltered housing schemes ; typically, the owner of the properties is responsible for maintenance and management and the States of Guernsey is responsible for the provision of care and support. |
| FR247 FR270 | Supported housing definition | The term “supported housing” is not referred to in the draft Plan | Remove the definition of “Supported housing” from the guidance. |
| Parking Standards and Traffic Impact Assessment | | | |
| IR714 | Parking Standards: 5.3 | Linking provision of vehicle parking spaces to the floor space and the use of maximum standards is considered a fair and logical approach which | Amend guidance to include a definition of 'habitable room' as a footnote linked to paragraph 5.3 |

| Source | Para. | Issue | Proposed amendment |
|---|---------------------------------------|--|---|
| | | reflects the aim and objectives of the draft Plan and the requirements of the States approved Integrated On Island Transport Strategy 2014. Clarification of the meaning of 'habitable room' is required | |
| Environment Department revision | 6. General Parking Standards: Table 2 | Existing standards, used in developing parking standards for other uses, were overlooked in establishing a benchmark for parking provision for shops | Amend Retail section provision for shops as follows: Main Centre Outer Areas - amend from 1 space per 3 occupants to 1 space per 20m ² |
| Change of Use of Visitor Accommodation to Non-Visitor Accommodation Use | | | |
| Environment Department revision | 3.1 | Further to the publication of the Guernsey Tourism Strategic Plan 2015-2025, amendments are needed to the title and date of the document and to reflect that the increase in visitor numbers is a target or aspiration and not a specific forecast | Amend paragraph 3.1 as follows: "The Commerce and Employment Department has policy responsibility for promoting the interests of the visitor accommodation sector of the Island's economy. The Visit Guernsey and Chamber of Commerce Tourism and Hospitality Sub-Group Strategic Plan, 20142015-2025 forecasts seeks to deliver growth in the Guernsey tourism economy over the Island Development Plan period. This would result in an increase from 3009,000 to 400,000 visitors to the Island per year by 2025." |
| Environment Department revision | 4.1 | To be consistent with the draft Plan, and for the avoidance of doubt, reference to the Main Centre Outer Areas should be included | Amend paragraph 4.1 as follows: "...whether it is in a Main Centre, Main Centre Outer Area , Local Centre or Outside of the Centres." |

Annex I: Typographical Errors

The Annex provides a table of typographical errors (typos) which have been noted by the Department but which are not considered significant changes to the content of the draft Island Development Plan, Proposals Map or Supplementary Planning Guidance. The typos here set out are all considered to be minor revisions. Only one (referenced in the table) arose from a representation.

| Paragraph | Issue | Proposed amendment |
|---|--|--|
| Draft Island Development Plan and Supplementary Planning Guidance | | |
| 2.2.23 | Missing comma and incorrect tense | Amend 1 st sentence of paragraph 2.2.23 as follows: “An appropriate mix, balance and type of dwellings is are desirable to ensure that all of the community’s housing needs can be met.” |
| Policy MC1 | Policy title refers to “Main Centre and Main Centre Outer Areas” | Amend title of draft Policy MC1 as follows: “Policy MC1: Important Open Land in Main Centres and Main Centre Outer Areas” |
| 6.1.2 | Full stop missing at end of paragraph | Amend paragraph 6.1.2 as follows: “...‘Windfall’ housing sites are undesignated sites that come forward for development during the Island Development Plan period which are not specifically identified for housing development but where policies exist to support its provision.” |

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|------------|--|--|
| 6.1.3 | Space included before first word of paragraph | Amend paragraph 6.1.3 as follows: “ This approach will enable the Main Centres to be maintained and enhanced as attractive and sustainable places to live, by encouraging regeneration and increasing residential accommodation close to services, employment, leisure opportunities, public transport links and walking and cycling networks.” |
| 7.2.15 | Throughout the draft Plan, the terms “seaport” or “seaports” have been used. For consistency, remove space between “sea ports” in paragraph 7.2.15 | Amend paragraph 7.2.15 as follows: “...and therefore benefit from quick and easy access to the seaports.” |
| Policy LC5 | Full stop missing at end of 4 th paragraph | Amend 4 th paragraph of draft Policy LC5 as follows: “Limited works to alter and/or extend existing comparison retail outlets will be supported provided that they are of a limited scale to provide for minor alterations to facilitate the continuation of the existing retail use at its current level of operation.” |
| 17.7.1 | Paragraph 17.7.1 refers to “...service accommodation such as hotels...” but refers to “...serviced apartments and non-serviced accommodation...” | Amend paragraph 17.7.1 to the following: “For the purposes of this policy, visitor accommodation is taken to refer primarily to serviced accommodation such as hotels, guest accommodation and serviced apartments, non-serviced accommodation such as self-catering units...” |

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|-------------------------|---|--|
| 19.14.9 | Paragraph 19.14.9 reads: "...Replacement dwellings on a one for one basis..." | Amend paragraph 19.14.9 as follows: "...Replacement of dwellings on a one for one basis, in less built up environments particularly, enables reconsideration of the layout, location and form of the building within the site to potentially improve its sustainability and its contribution to the character and openness of an area or visual access to open land and can offer opportunity for enhancement and more efficient use of the site." |
| 19.16.9 | Paragraph 19.16.9 reads: "Proposals for extending or a creating curtilage..." | Amend 1 st sentence of paragraph 19.16.9 as follows: "Proposals for extending or a creating curtilage should not result in an unacceptably negative impact on natural habitats." |
| Annex VII: CAs | The headings within each Conservation Area do not accord with those used in the report "Designating Conservation Areas", March 2015 | Amend Annex VII, for Conservation Areas 1-9 and 12-25, as follows: "Summary of Special Interest, Character or appearance " And, for Conservation Areas 10 and 11, as follows: "Summary of Special iInterest, Character or appearance " |
| Annex VII: CAs – VII.39 | Spelling error: "interedt" | Amend final sentence of paragraph VII.39 as follows: "These relationships and the use of materials typical to the north of Guernsey lend a special interest ed to the area so that it is desirable to preserve or enhance its character and appearance as described above." |

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| Visitor Accommodation SPG – 7.8 | The Environment Department and Commerce and Employment Departments are referred to in paragraphs 7.7 and 7.8 | Amend the 3 rd paragraph of 7.8 as follows: “Information is required on these issues which could affect turnover so that the Environment Department and Commerce and Employment Departments can properly assess the realism of the rates and occupancy levels used in the forecast accounts.” |
| 4.1.2 15.1.8 20.2.3 | Minor amendments to the wording of the draft Plan would be beneficial in these areas | Amend the 2 nd sentence of paragraph 4.1.2 as follows: <ul style="list-style-type: none"> • “In satisfying the objective of the Strategic Land Use Plan’s objective of to supporting development...” Amend the 2 nd sentence of paragraph 15.1.8 as follows: <ul style="list-style-type: none"> • “...their wholesale development would urbanise the countryside and run counter to the spatial strategy of the Strategic Land Use Plan’s spatial strategy...” Amend the 2 nd sentence of paragraph 20.2.3 as follows: <ul style="list-style-type: none"> • “The core objectives of the Strategic Land Use Plan’s core objectives ives” |

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|---------------------|--|---|
| 21.5.4 | For consistency with the preceding bullet points, pluralise “Habitat Survey” | Amend 4 th bullet point of 21.5.4 as follows: “Habitat Surveys – commissioned by the Environment Department to establish the extent of change in habitat composition. The intention is to repeat the survey every 10 years.” |
| 21.4.3 | Ensure consistency with other relevant references to the Housing Needs Survey | Amend 2 nd bullet point of paragraph as follows: “... the most recent Housing Needs Survey...” |
| 21.5.5 | A minor amendments to the wording of the draft Plan would be beneficial in this area | Amend paragraph 21.5.5 to the following: “...such as the Commerce and Employment- s ’ Department report A Retail Strategy for Guernsey...” |
| VIII.10 | Ensure consistency with other relevant references and ensure accordance with the agreed approach | De-capitalise “protected monuments list” and “protected buildings list” |
| Footnote 11 (p.330) | Ensure consistency with other references to divisions of States’ departments | De-capitalise “division” |

| Paragraph | Issue | Proposed amendment |
|---------------------------------------|--|---|
| Affordable Housing SPG 4.3 and 5.3 | The full reference to a document should be made the first time it appears. Minor amendments to the wording of the draft Plan would therefore be beneficial in these areas | <p>Amend paragraph 4.3 as follows:</p> <p>“The report builds on earlier work commissioned by the Environment Department into the feasibility of securing affordable housing through the planning process as part of the Housing Department’s Policy Plan 2011 - 2016 Corporate Housing Programme (CHP)(3).”</p> <p>Amend paragraph 5.3 as follows:</p> <p>“In addition to the Strategic Land Use Plan, the Housing Department’s Policy Plan 2011 – 2016 Corporate Housing Programme (CHP) translates into action a number of objectives set out in the Social Policy Plan part of the States Strategic Plan.”</p> |
| Affordable Housing SPG 7.3 and 7.4 | Ensure consistency with other relevant references to Affordable Housing | Capitalise “Affordable Housing” |
| Throughout | <p>In referring to the departments of the States, the following standard approaches should be used:</p> <p>“States’ departments”</p> <p>“States’ _____(e.g. Culture and Leisure) Department”</p> | Where required, amend references to departments of the States to accord with the relevant agreed approach |
| Throughout | <p>In referring to the Law and Ordinances, the following standard approach should be used:</p> <p>“the Land Planning and Development (___)</p> | Where required, amend references to the Law and Ordinances to accord with the agreed approach |

| Paragraph | Issue | Proposed amendment |
|------------|--|---|
| | Law/Ordinance, 20__" Unless beginning a sentence, "the" should not be capitalised | |
| Throughout | Previously agreed that "Spatial Policy" should be capitalised and "spatial strategy" should not. There are several instances within the draft documents where this is not followed | Where required, de-capitalise references to the spatial strategy and capitalise references to the Spatial Policy |
| Throughout | Ensure accuracy in referring to States of Guernsey (and other) published documents | Where required, amend references to States of Guernsey (and other) published documents. Inaccuracies have been noted in referencing the following documents: <ul style="list-style-type: none"> • "States' Strategic Plan" • "States' Strategic Monitoring Report, 2014" • "States' Sites and Monuments Record" • "A Retail Strategy for Guernsey, 2013" • "Energy Resource Plan, 2011" • "Opportunities for Public Art, 2014" • "Integrated On-Island Transport Strategy, 2014" |

| | | |
|--|--|---|
| | | <ul style="list-style-type: none"> • “Duke of Richmond Map of 1787” • “Biodiversity Strategy for Guernsey, 2014” • “Visit Guernsey and Chamber of Commerce Tourism Group Strategic Plan, 2014-2025” • “Guernsey Technical Standards” • “States’ Waste Strategy” • “Supplementary Planning Guidance: Affordable Housing” • “Supplementary Planning Guidance: Parking Standards and Traffic Impact Assessment” • Guernsey Coastal Defence Flood Studies and approved strategy, 2013, Billet d’Etat XV, July 2013” |
|--|--|---|

| Paragraph | Issue | Proposed amendment |
|----------------------------|--|---|
| Proposals Map | | |
| Main Centre Inner Boundary | In places, designation boundaries cut through buildings/features or do not reflect features on the ground or follow a line of sight | Minor amendments to ensure that the boundaries accurately follow features on the ground, whether that be roads, banks, property boundaries, etc., or lines of sight |
| Main Centre Outer Boundary | In places, designation boundaries cut through buildings/features or do not reflect features on the ground or follow a line of sight | Minor amendments to ensure that the boundaries accurately follow features on the ground, whether that be roads, banks, property boundaries, etc., or lines of sight |
| Local Centres maps | Road names and other labels are too faint and not easily readable The “Salvation Army Fortress” label is not positioned over the Salvation Army site at L’Islet | Increase weight of text Reposition label to better reflect the location of the Salvation Army Fortress (C02558A000) |
| Important Open Land | In places, designation boundaries cut through buildings/features or do not reflect features on the ground or follow a line of sight | Minor amendments to ensure that the boundaries accurately follow features on the ground, whether that be roads, banks, property boundaries, etc., or lines of sight |
| Housing Allocations | In places, designation boundaries cut through buildings/features or do not reflect features on the ground or follow a line of sight | Minor amendments to ensure that the boundaries accurately follow features on the ground, whether that be roads, banks, property boundaries, etc., or lines of sight |
| Key Industrial Area | In places, designation boundaries cut through | Minor amendments to ensure that the boundaries accurately follow |

| Paragraph | Issue | Proposed amendment |
|--|--|--|
| | buildings/features or do not reflect features on the ground or follow a line of sight | features on the ground, whether that be roads, banks, property boundaries, etc., or lines of sight |
| Key Industrial Expansion Area: Northside | In the eastern part of the Northside designation there is an overlap between the Key Industrial Area and Key Industrial Expansion Area | Amend boundary to omit the Vale Castel Industrial Estate road from the Key Industrial Area |
| Core Retail Area: St Peter Port | In places, designation boundaries cut through buildings/features or do not reflect features on the ground or follow a line of sight | Minor amendments to ensure that the boundaries accurately follow features on the ground, whether that be roads, banks, property boundaries, etc., or lines of sight |
| Regeneration Areas | In places, designation boundaries cut through buildings/features or do not reflect features on the ground or follow a line of sight | Minor amendments to ensure that the boundaries accurately follow features on the ground, whether that be roads, banks, property boundaries, etc., or lines of sight |
| Agriculture Priority Area | The Agriculture Priority Area overlaps with the Airport Land to north east and south | Reposition the boundary of the Agriculture Priority Area to accord with the extent of the Airport Land at the emergency access from the junction of La Villiaze Road/Les Blicqs Lane and the entrance to Airport from Rue des Landes |
| Agriculture Priority Area | In places, designation boundaries cut through buildings/features or do not reflect features on the ground or follow a line of sight | Minor amendments to ensure that the boundaries accurately follow features on the ground, whether that be roads, banks, property boundaries, etc., or lines of sight |
| Sites of Special Significance | Designation amended to ensure no overlap arises with L'Islet Local Centre | Minor amendments to ensure that the boundaries accurately follow features on the ground, whether that be roads, banks, property boundaries, etc., or lines of sight |
| Conservation Areas | In places, designation boundaries cut through buildings/features or do not reflect features on the ground or follow a line of sight | Minor amendments to ensure that the boundaries accurately follow features on the ground, whether that be roads, banks, property boundaries, etc., or lines of sight |
| Capelles | The word 'Capelles' is printed/located at the | Amend the position of the 'Capelles' label towards the north east to |

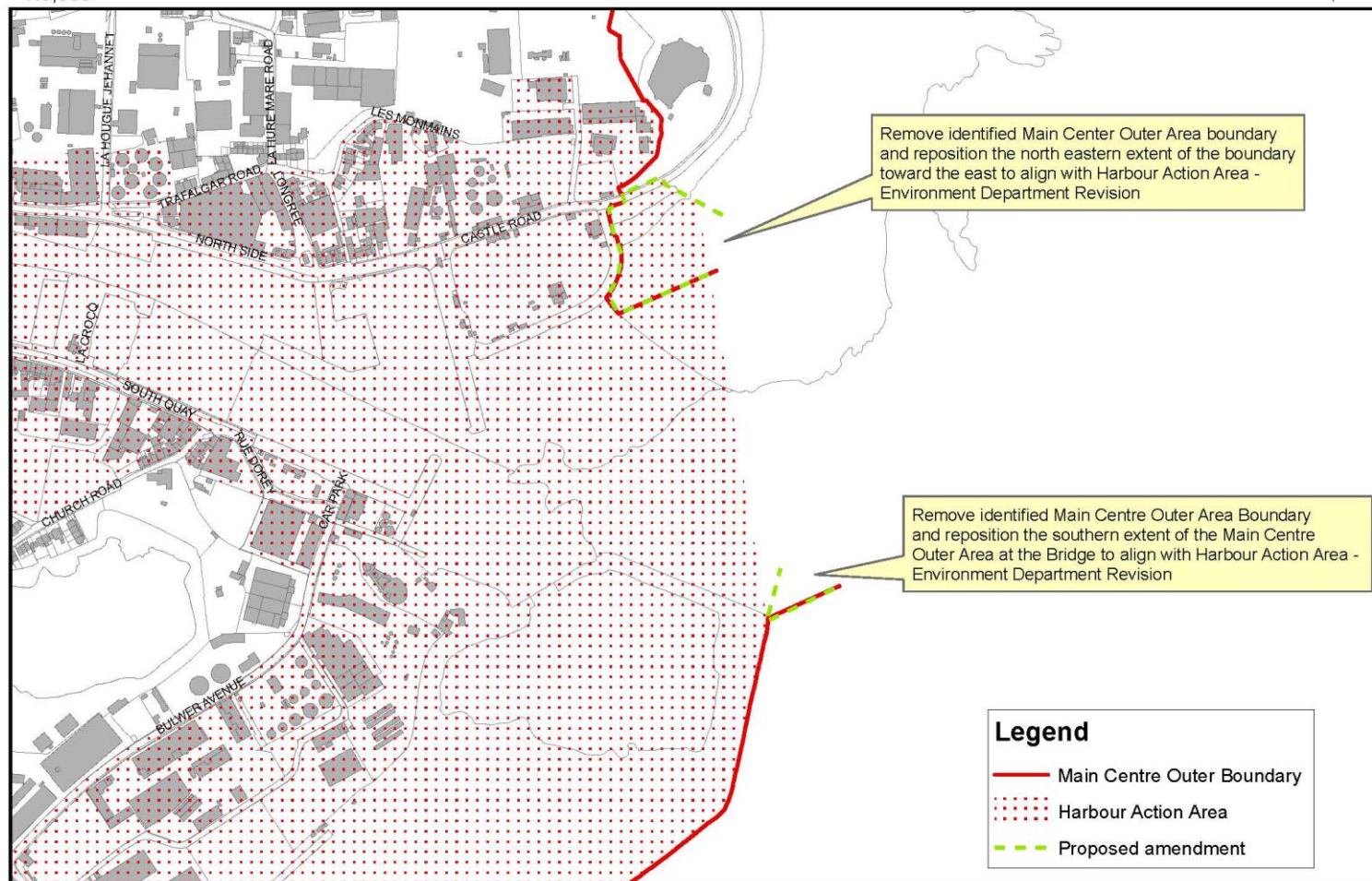
| Paragraph | Issue | Proposed amendment |
|---------------------|---------------------------------|---|
| (from IR721) | Camp du Roi and not at Capelles | more accurately reflect the location of Capelles |
| Inset box 6 | For consistency of appearance | Reposition number “6” upward and to left |
| Copyright reference | For clarity | Amend copyright reference as follows: “The survey background data used in this map is based on data supplied by Digimap Ltd.” |

Proposed amendment Inset 1

2015



1:5,000

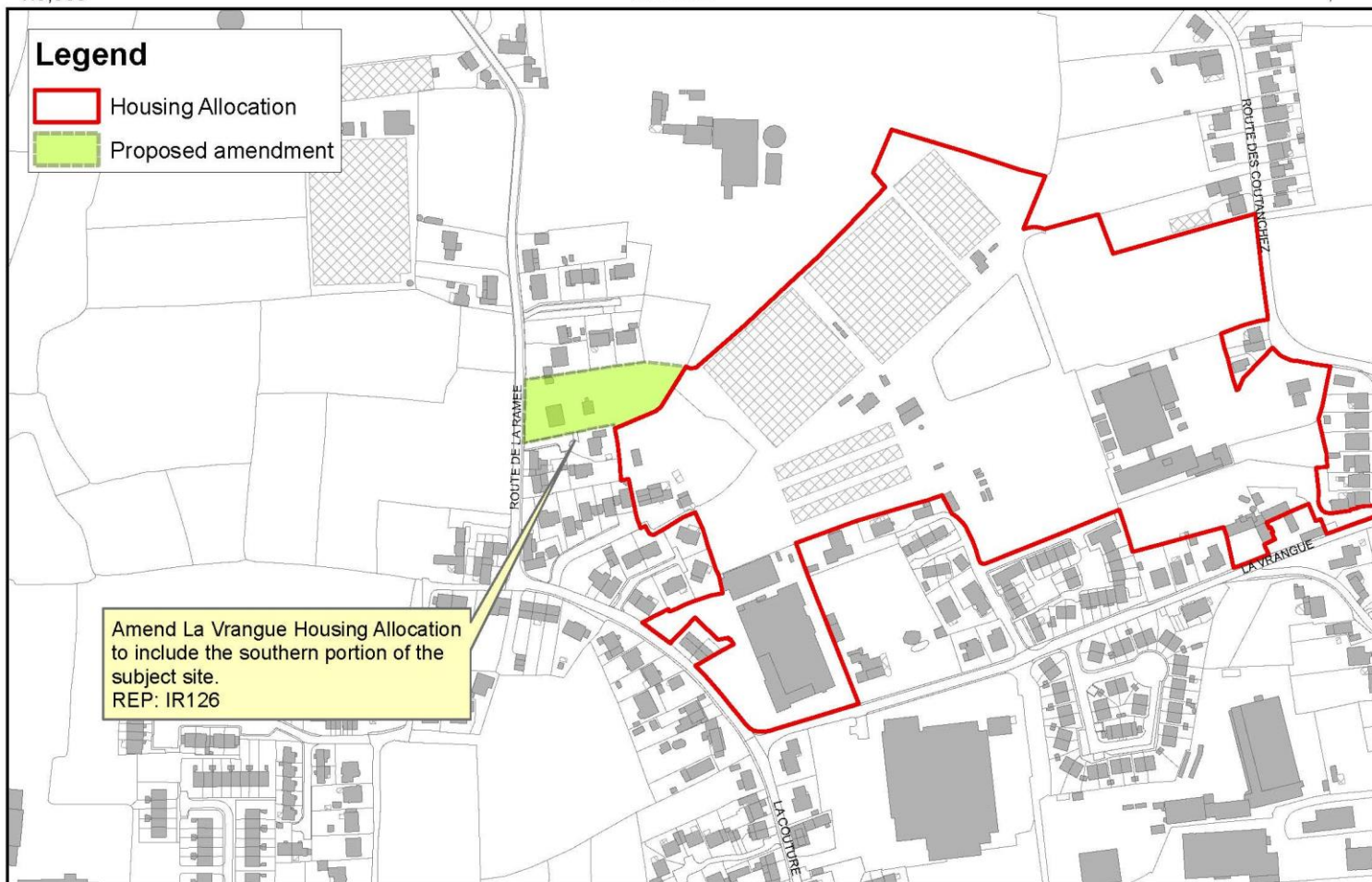


Proposed amendment

Inset 2



1:3,000



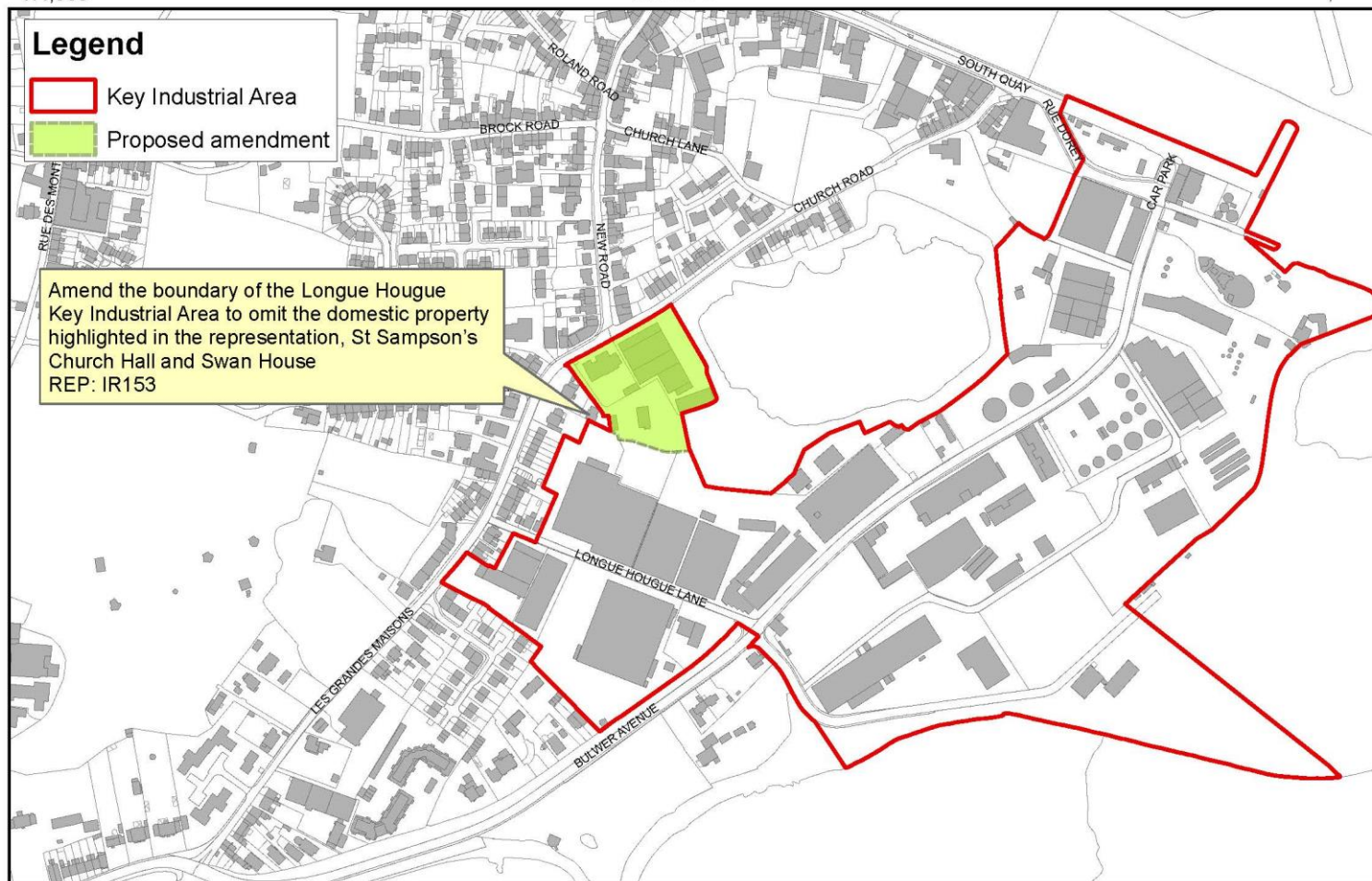
Proposed amendment

Inset 3

2015



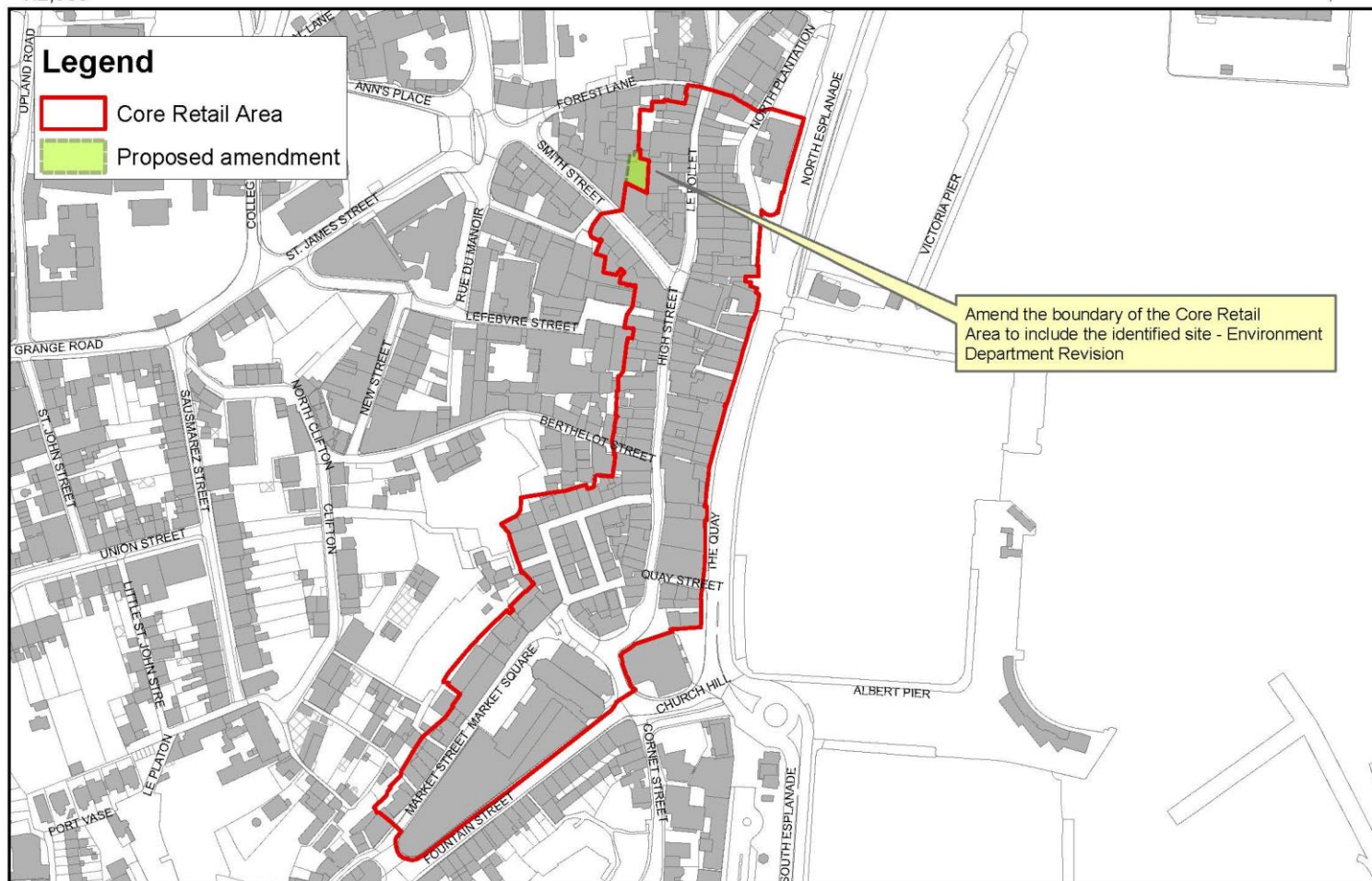
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Proposed amendment *Inset 4*



1:2,500



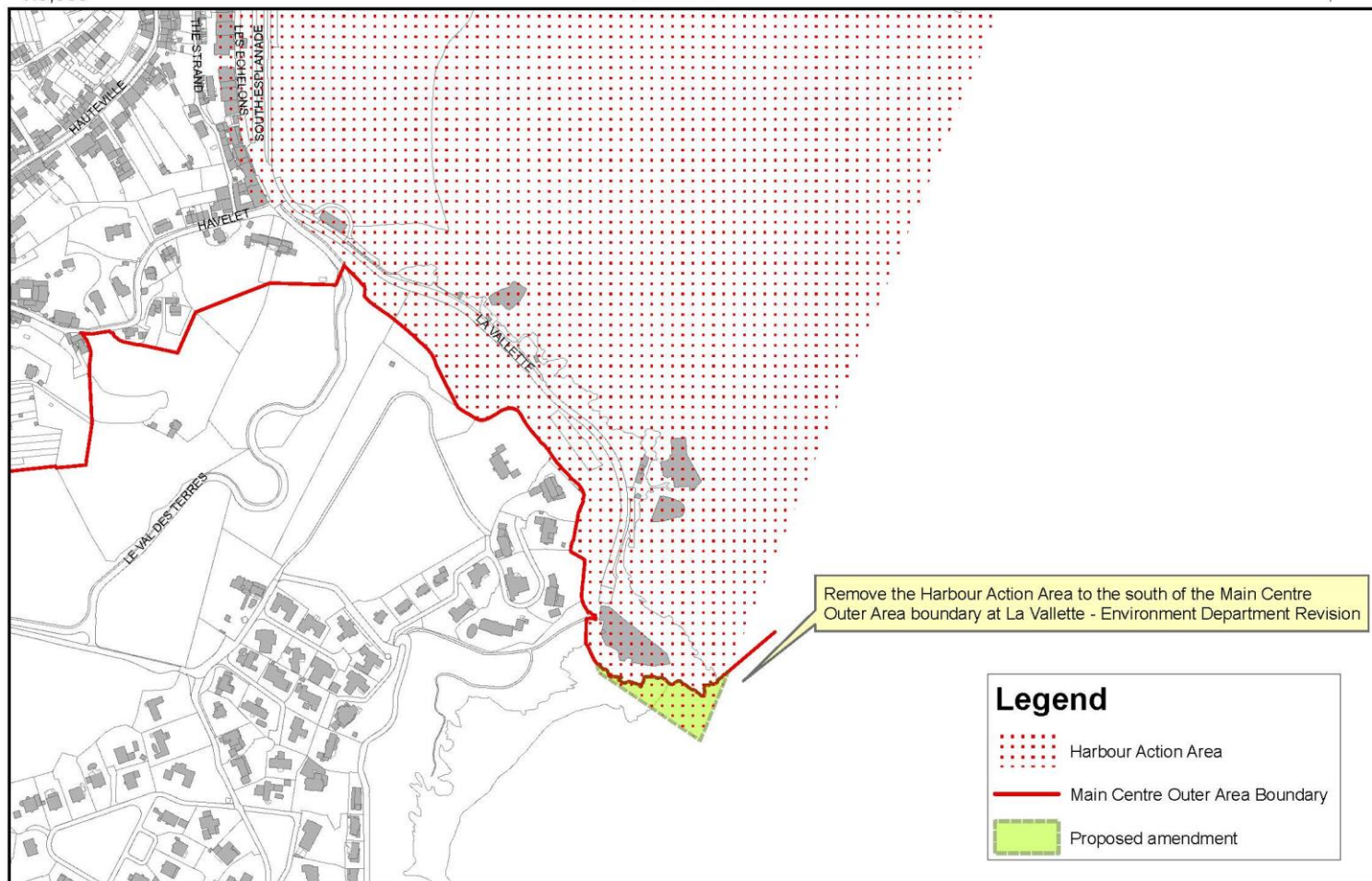
Proposed amendment

Inset 5

2015



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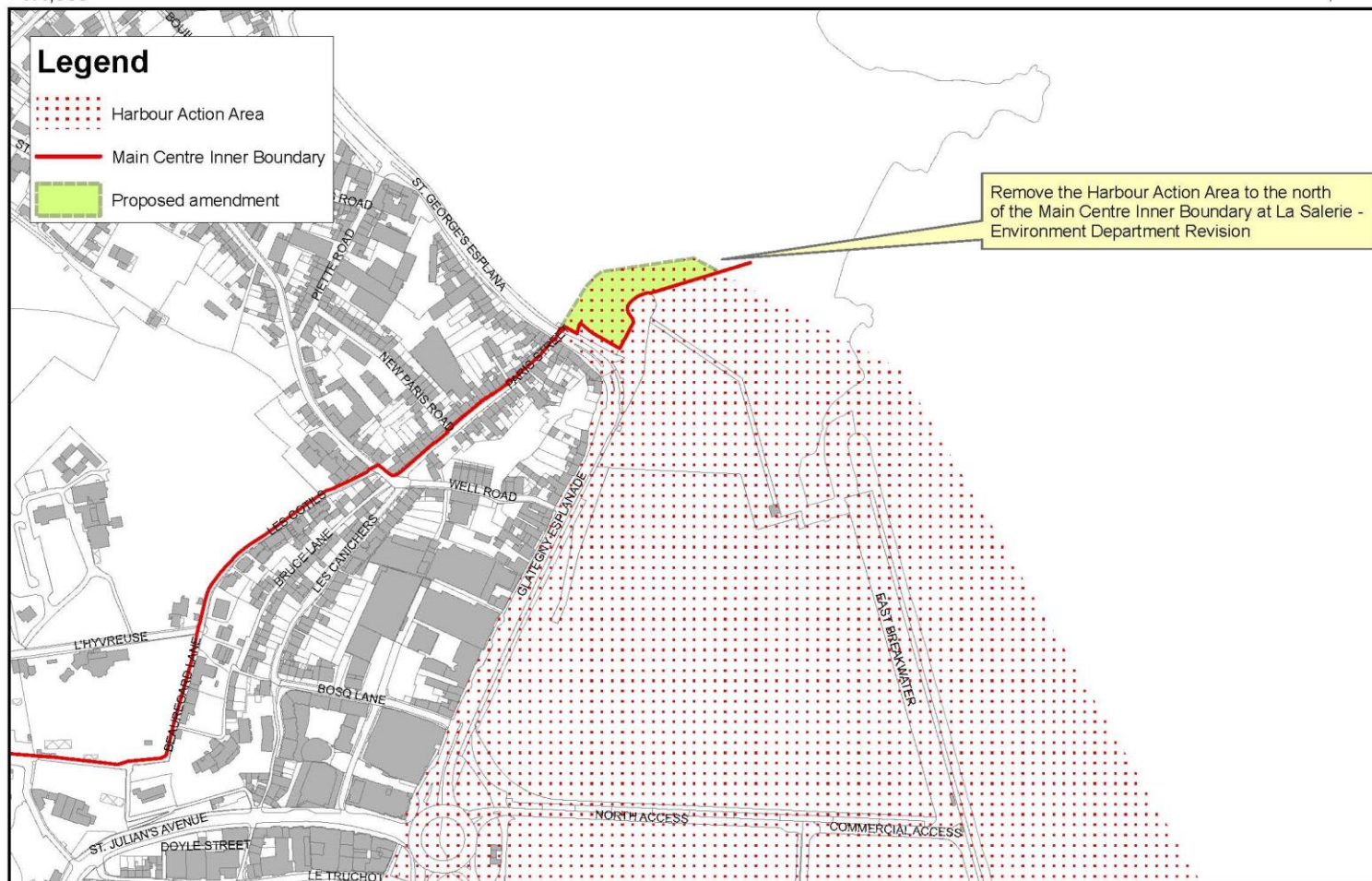


Proposed amendment Inset 6

2015



1:4,000



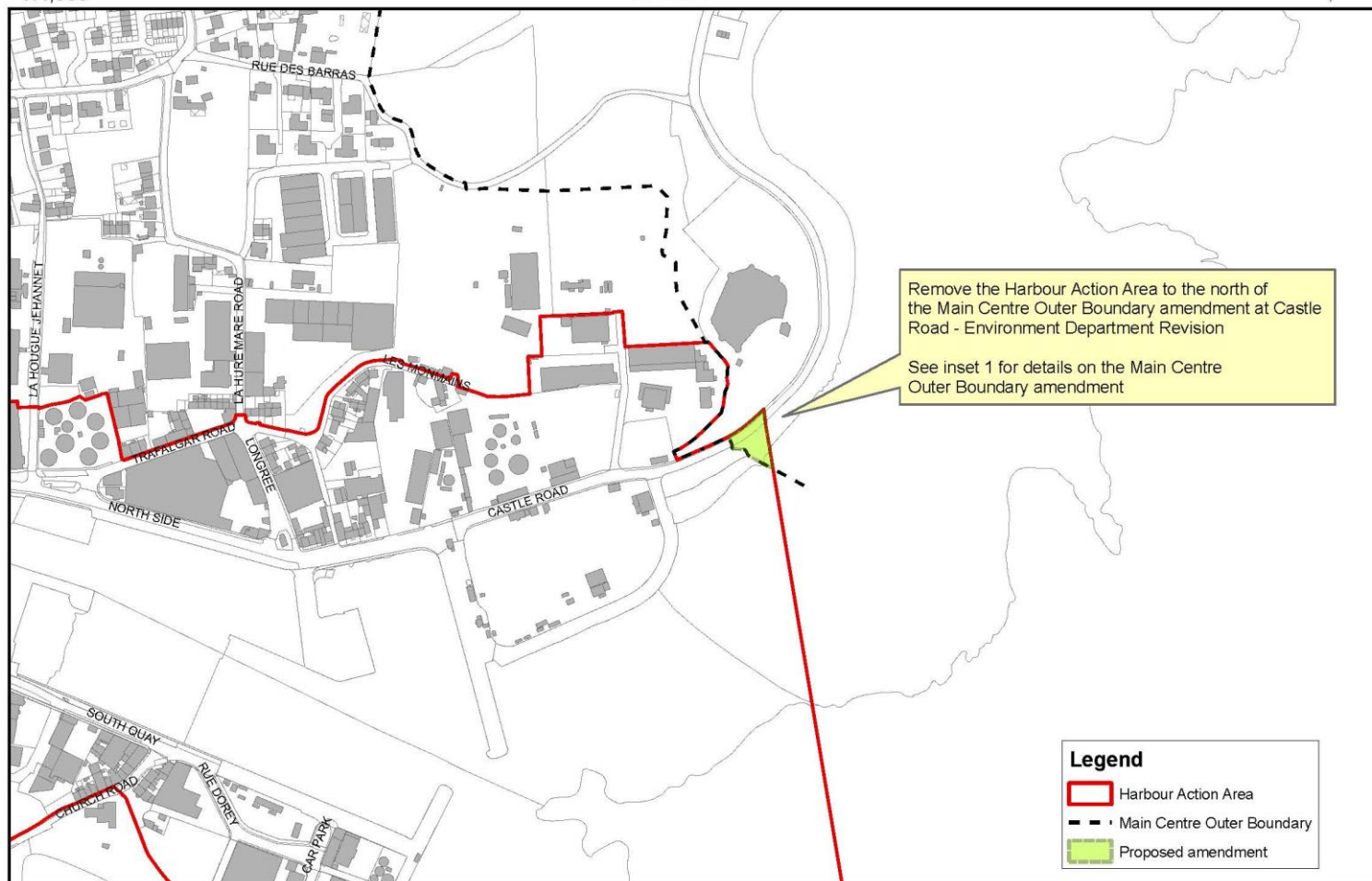
Proposed amendment

2015



1:4,000

Inset 7

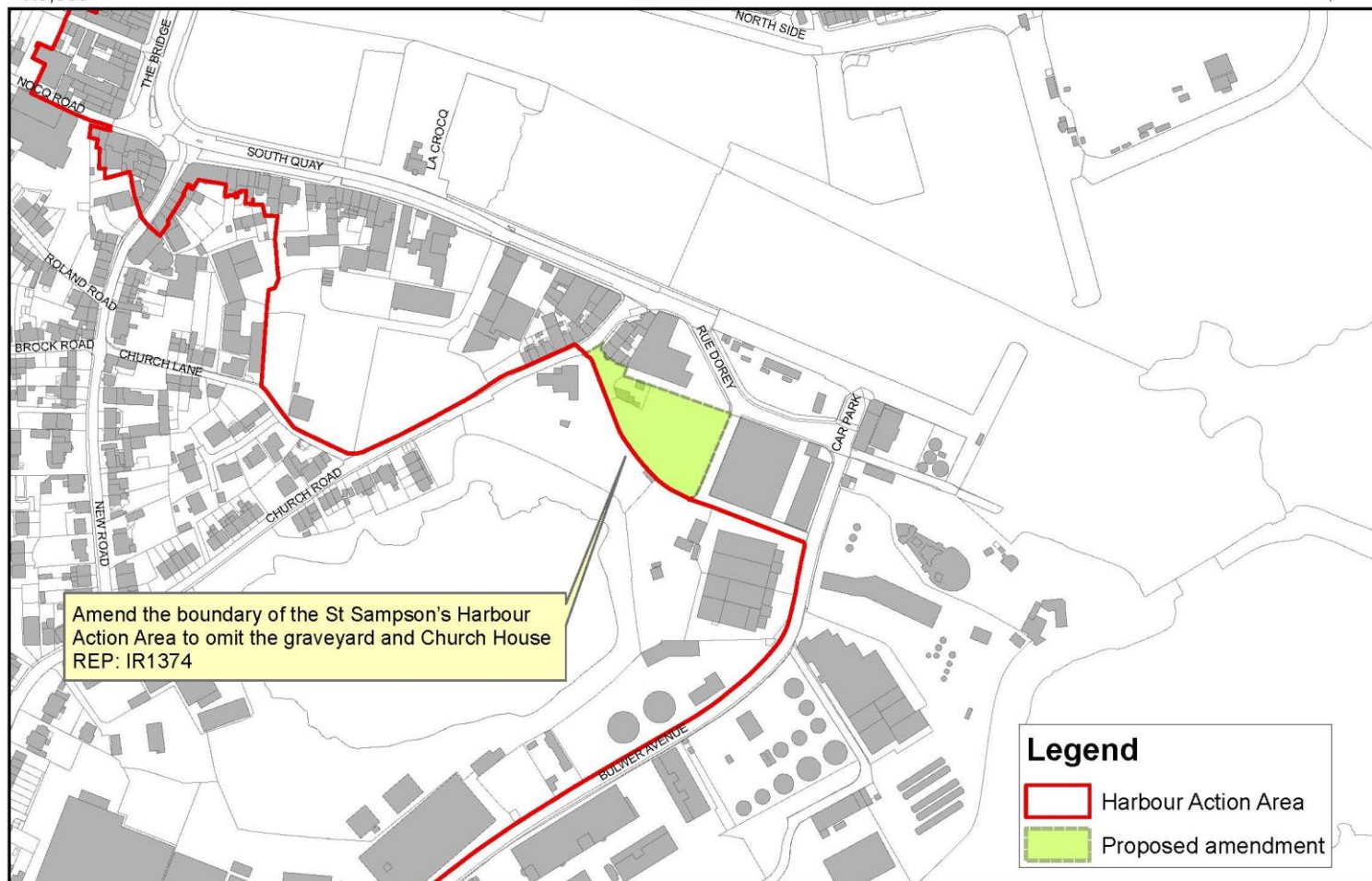


Proposed amendment

Inset 8



1:3,000



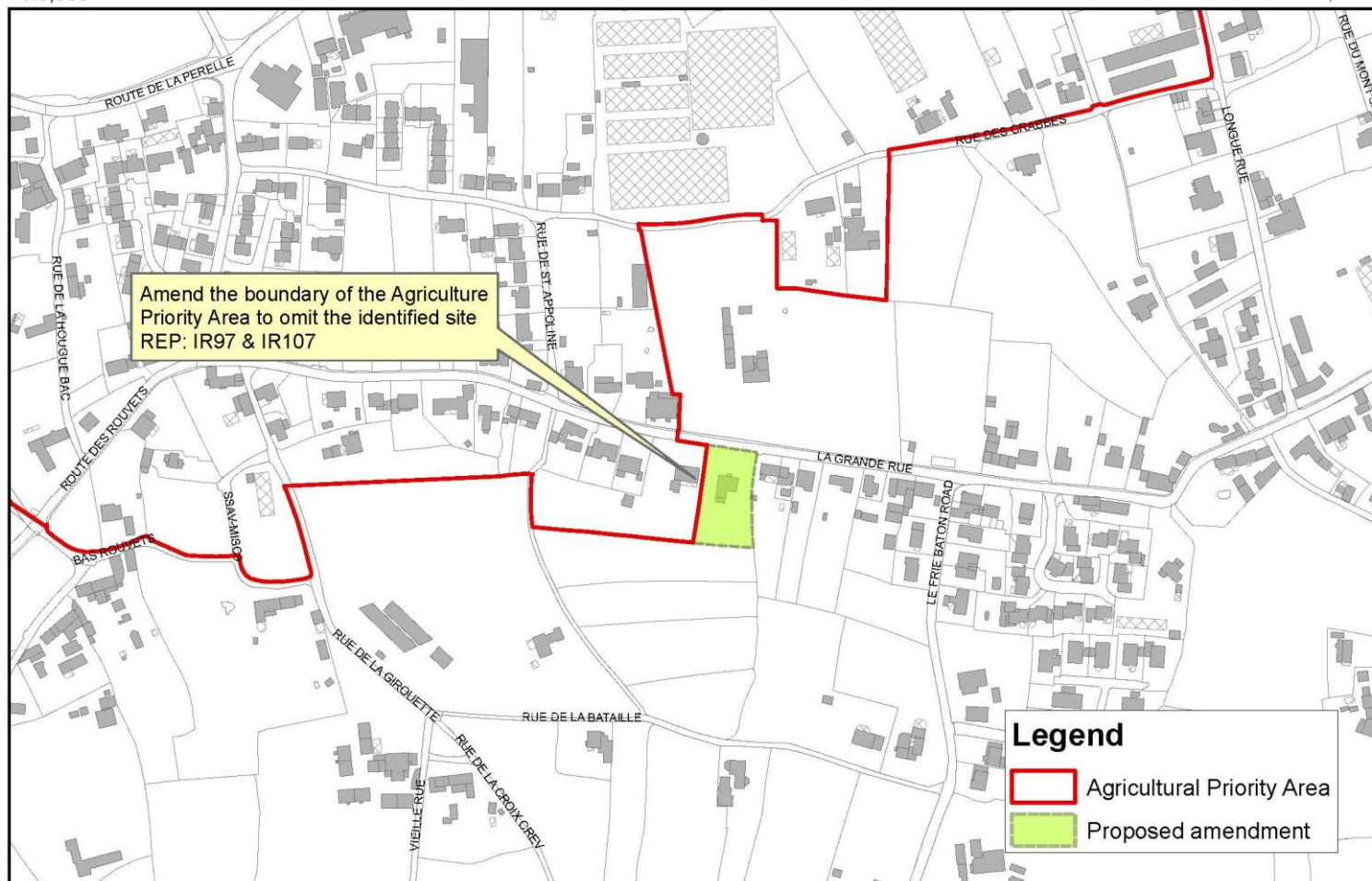
Proposed amendment

Inset 9

2015



1:3,000



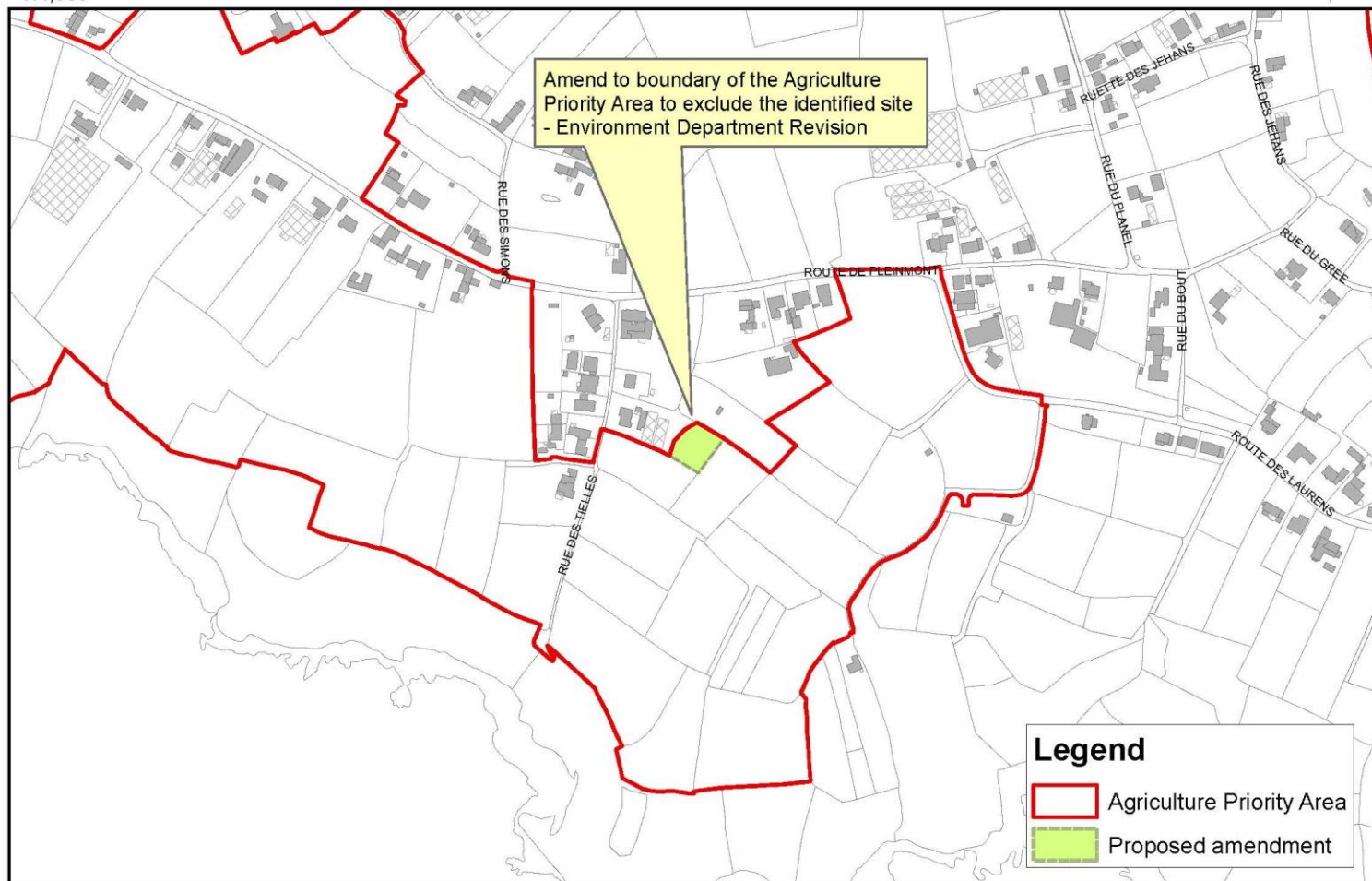
Proposed amendment

Inset 10

2015

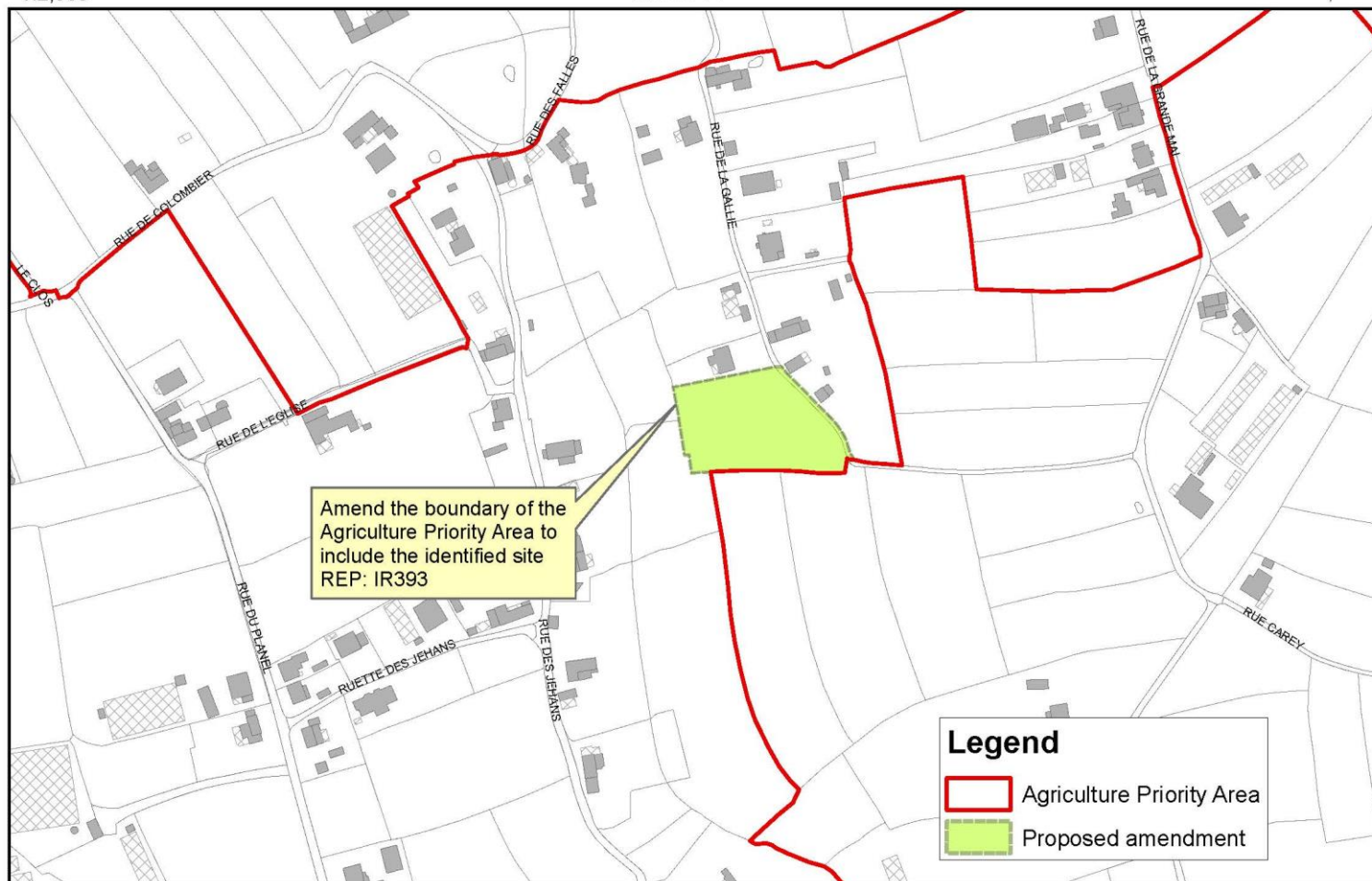


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Inset 11

2015



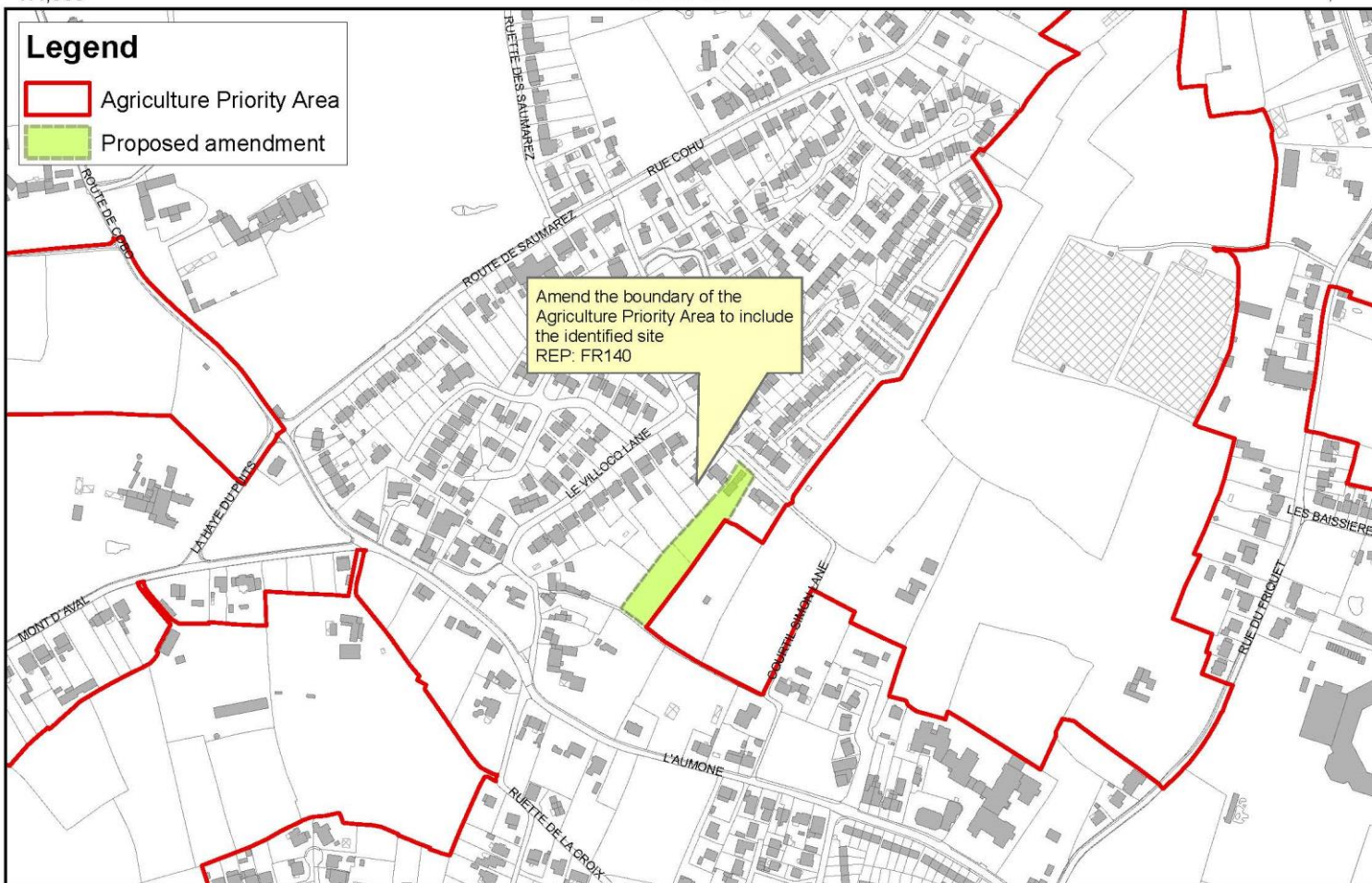
Proposed amendment

Inset 12

2015



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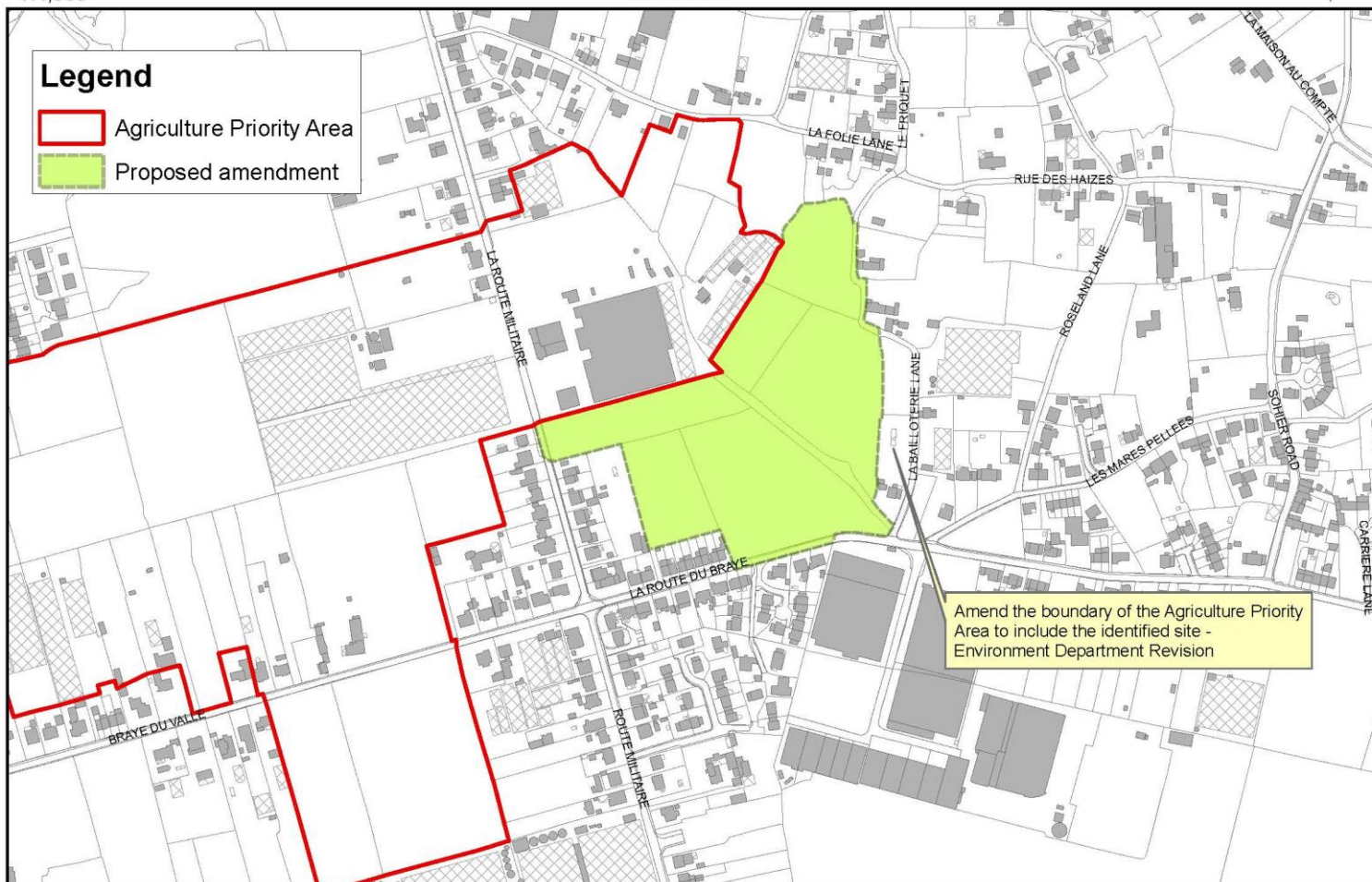
Proposed amendment

Inset 13

2015



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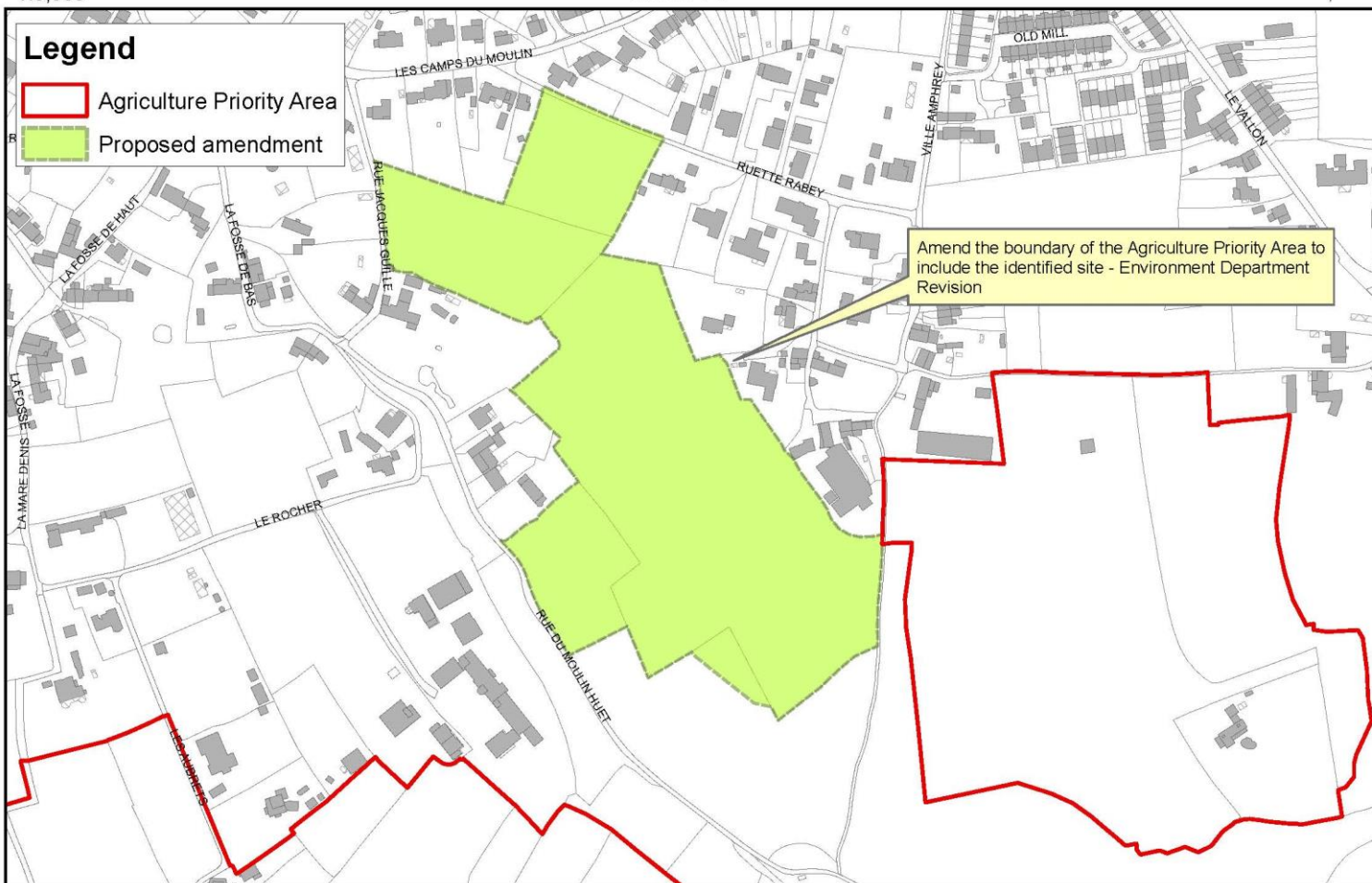
Proposed amendment

Inset 14

2015



1:3,000



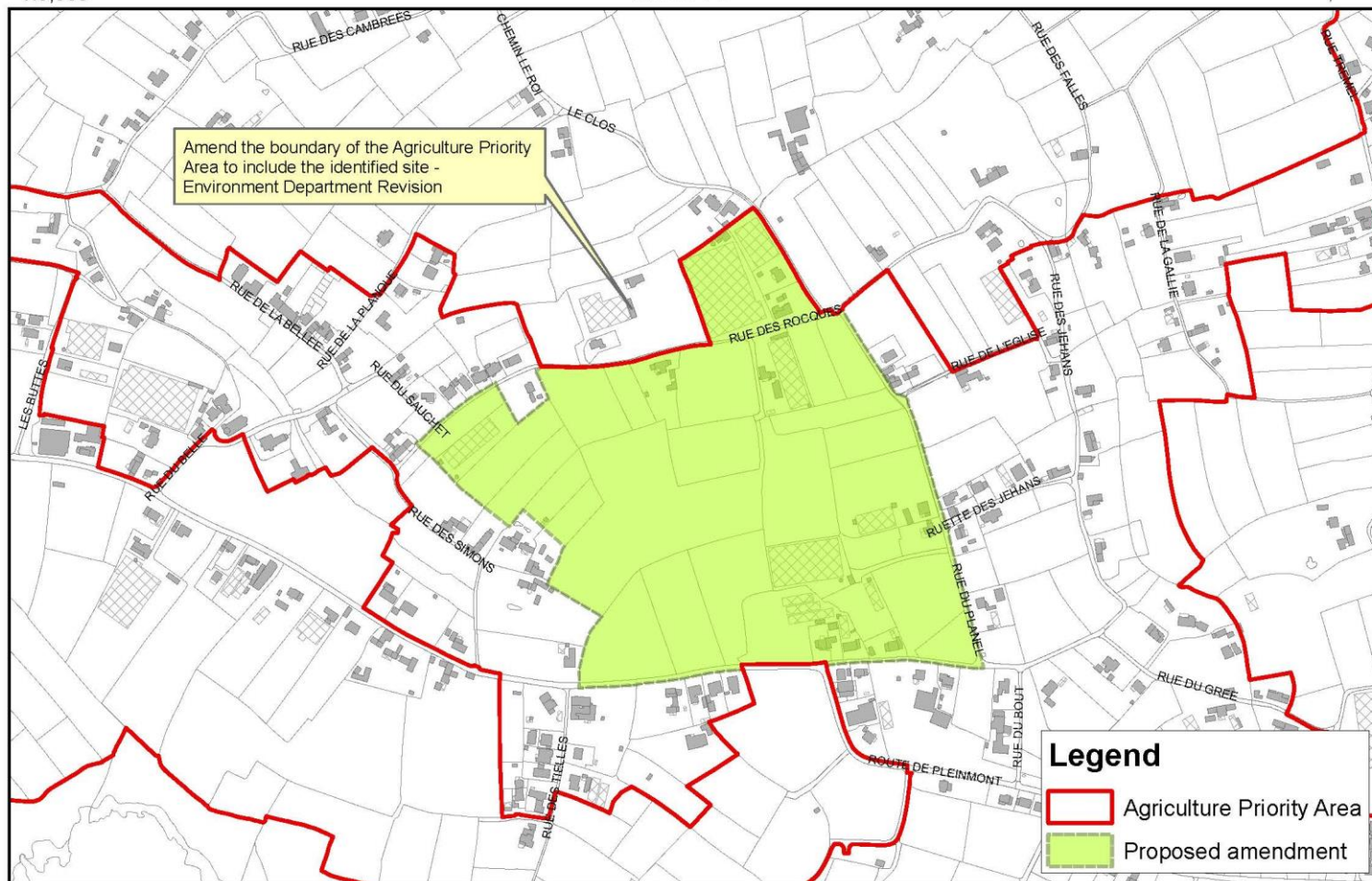
Proposed amendment

Inset 15

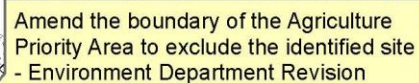
2015



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Inset 16



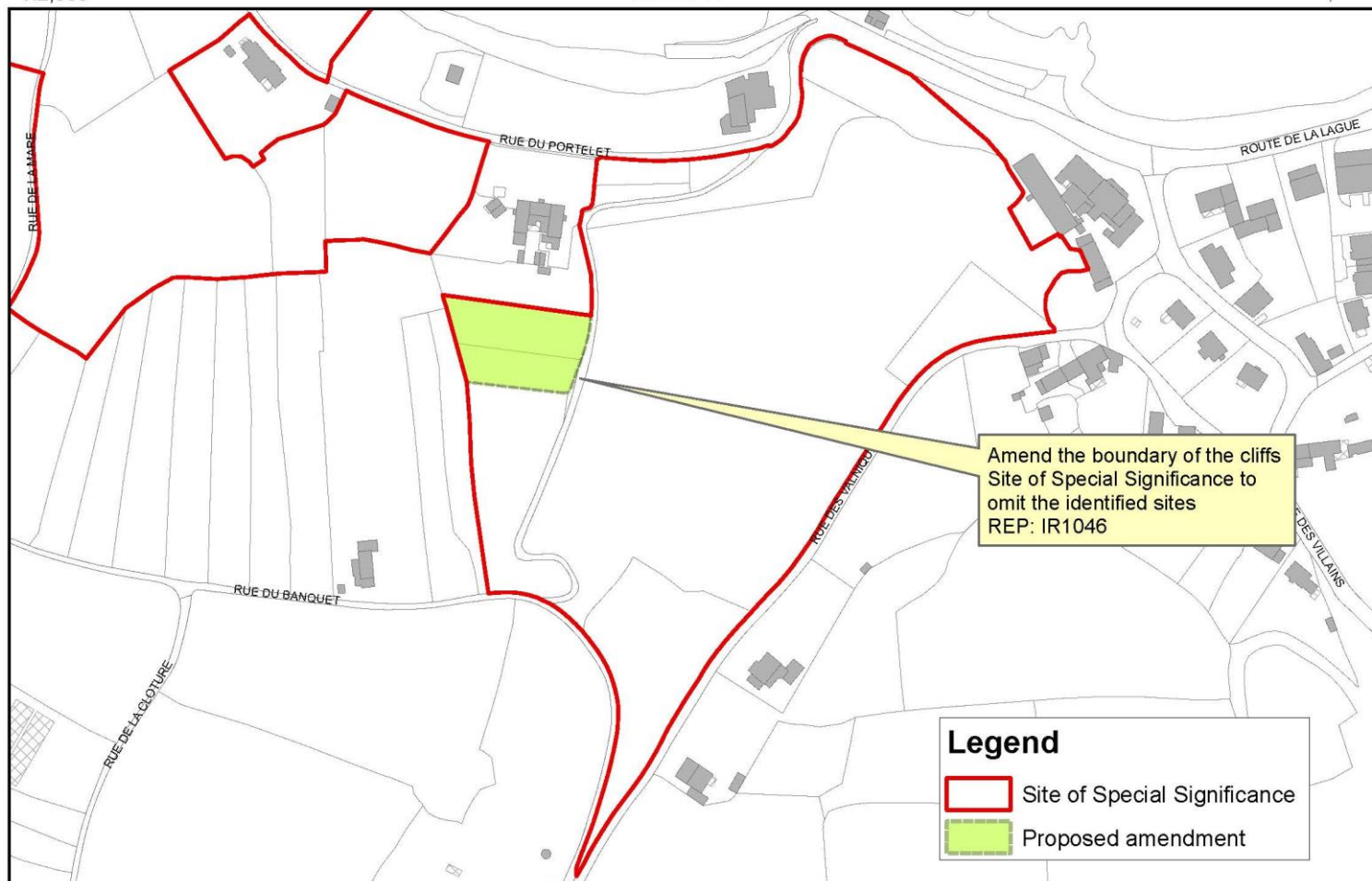
Proposed amendment

Inset 17

2015



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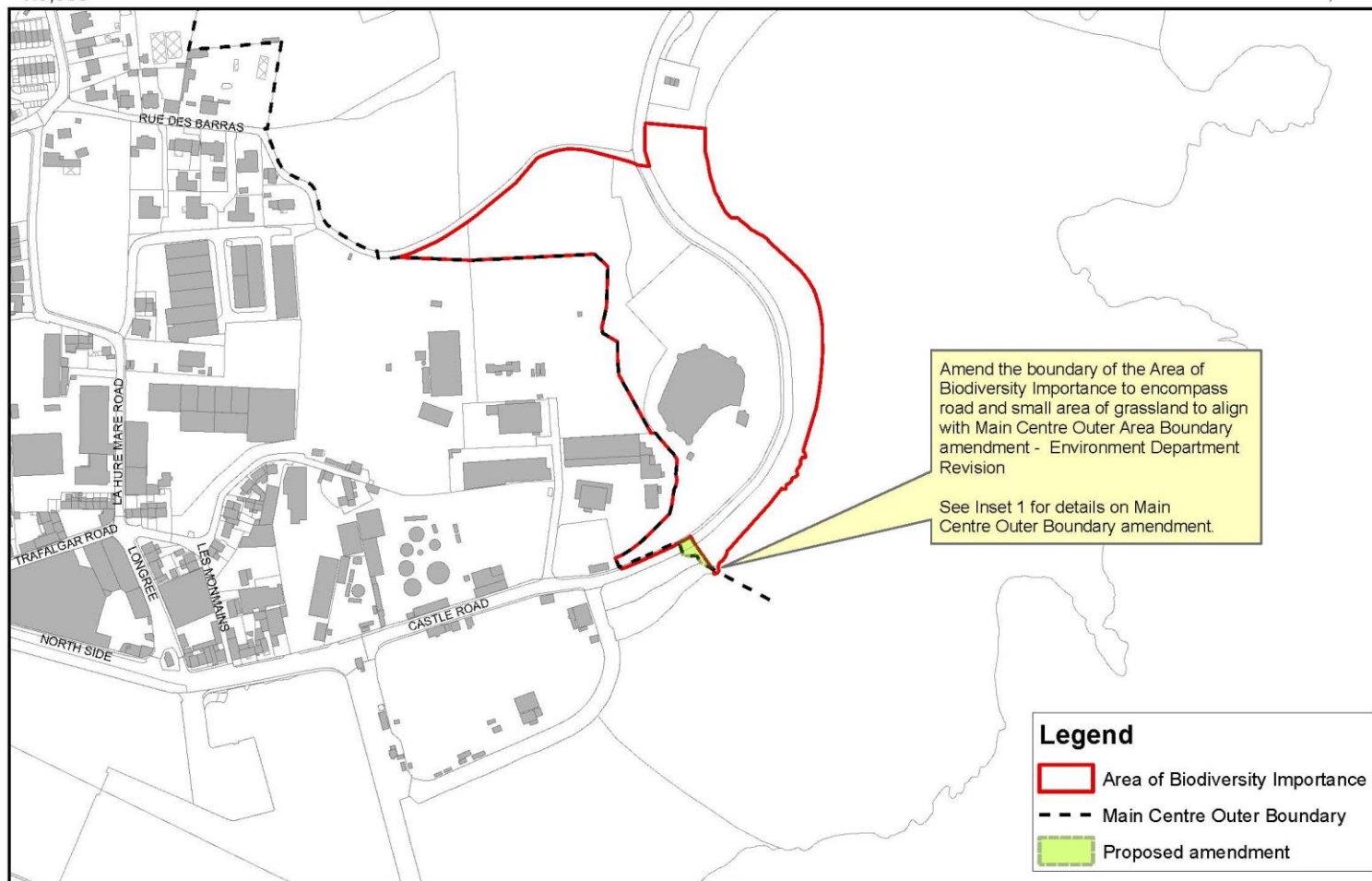


Proposed amendment *Inset 18*

2015



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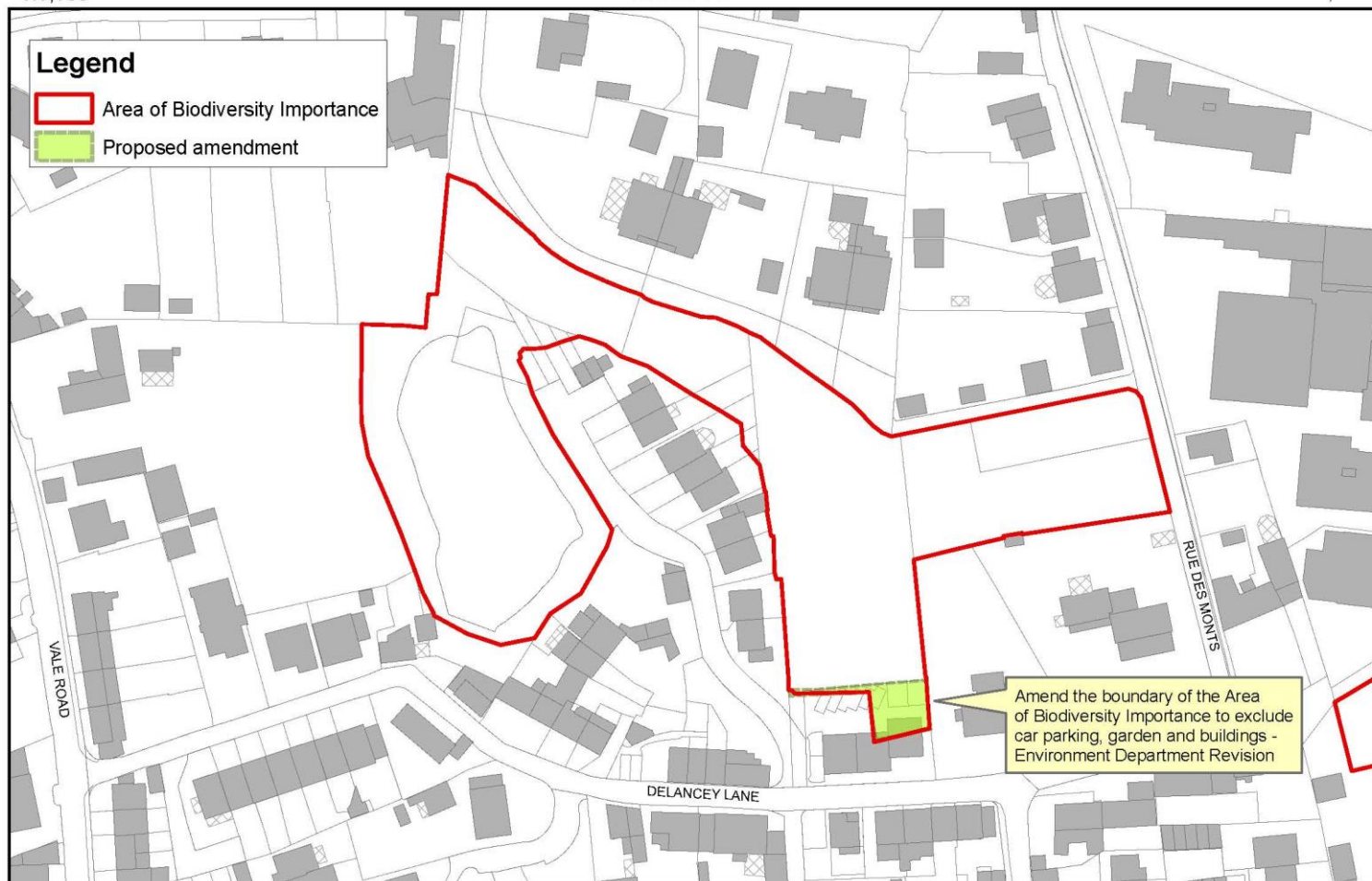
Proposed amendment

Inset 19

2015



1:1,100

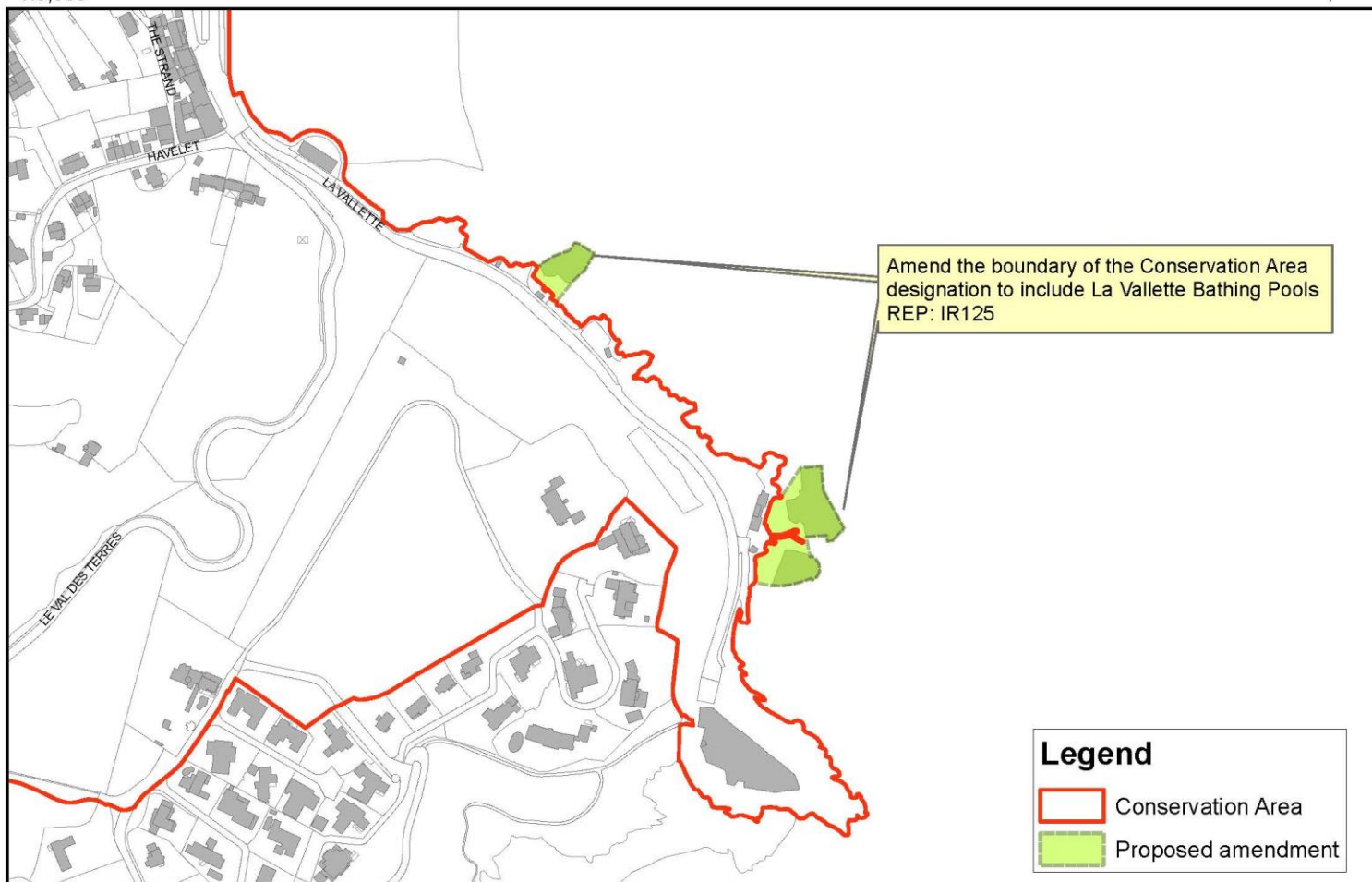


Proposed amendment
Inset 20

2015



1:3,500



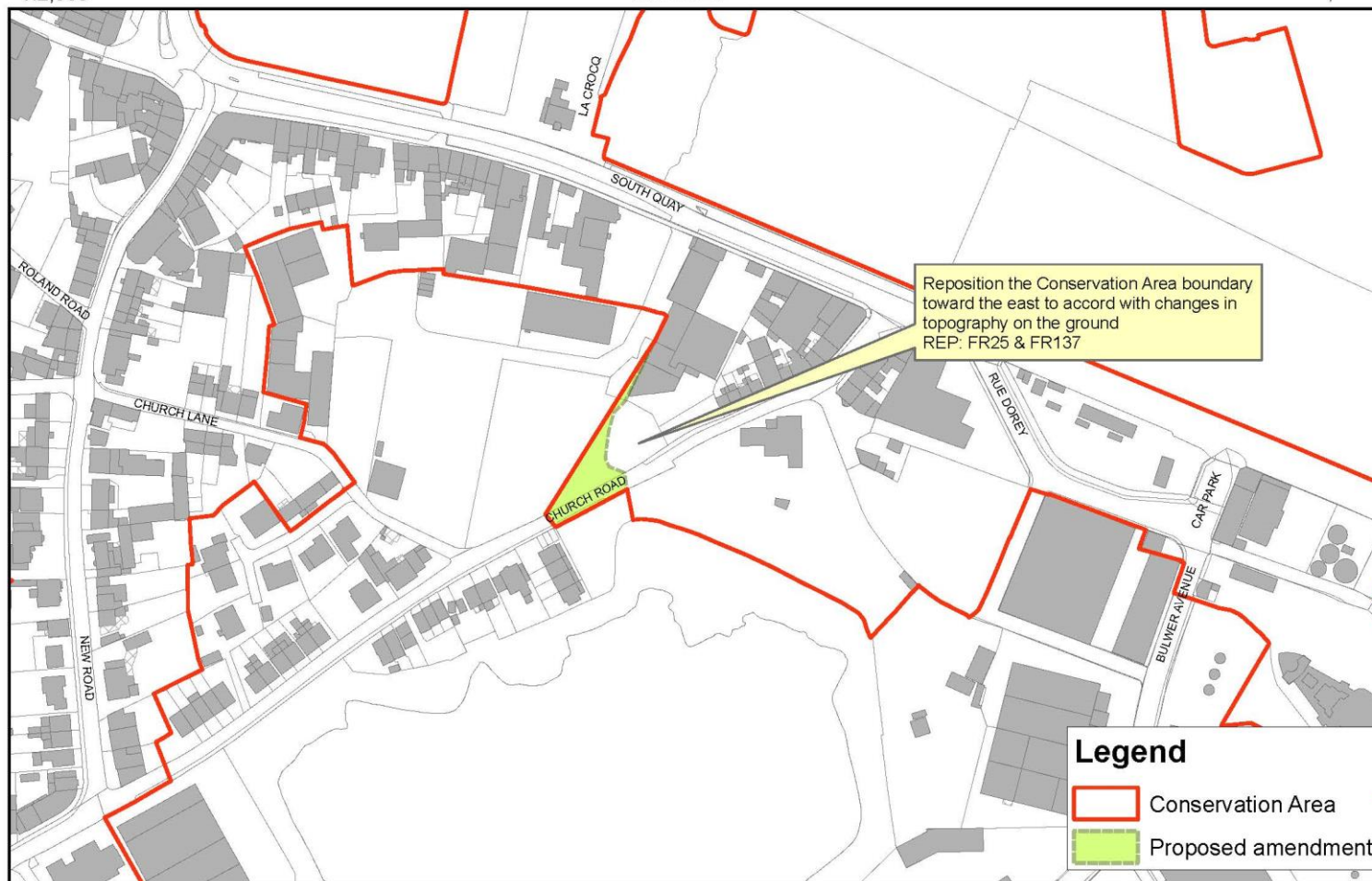
Proposed amendment

Inset 21

2015

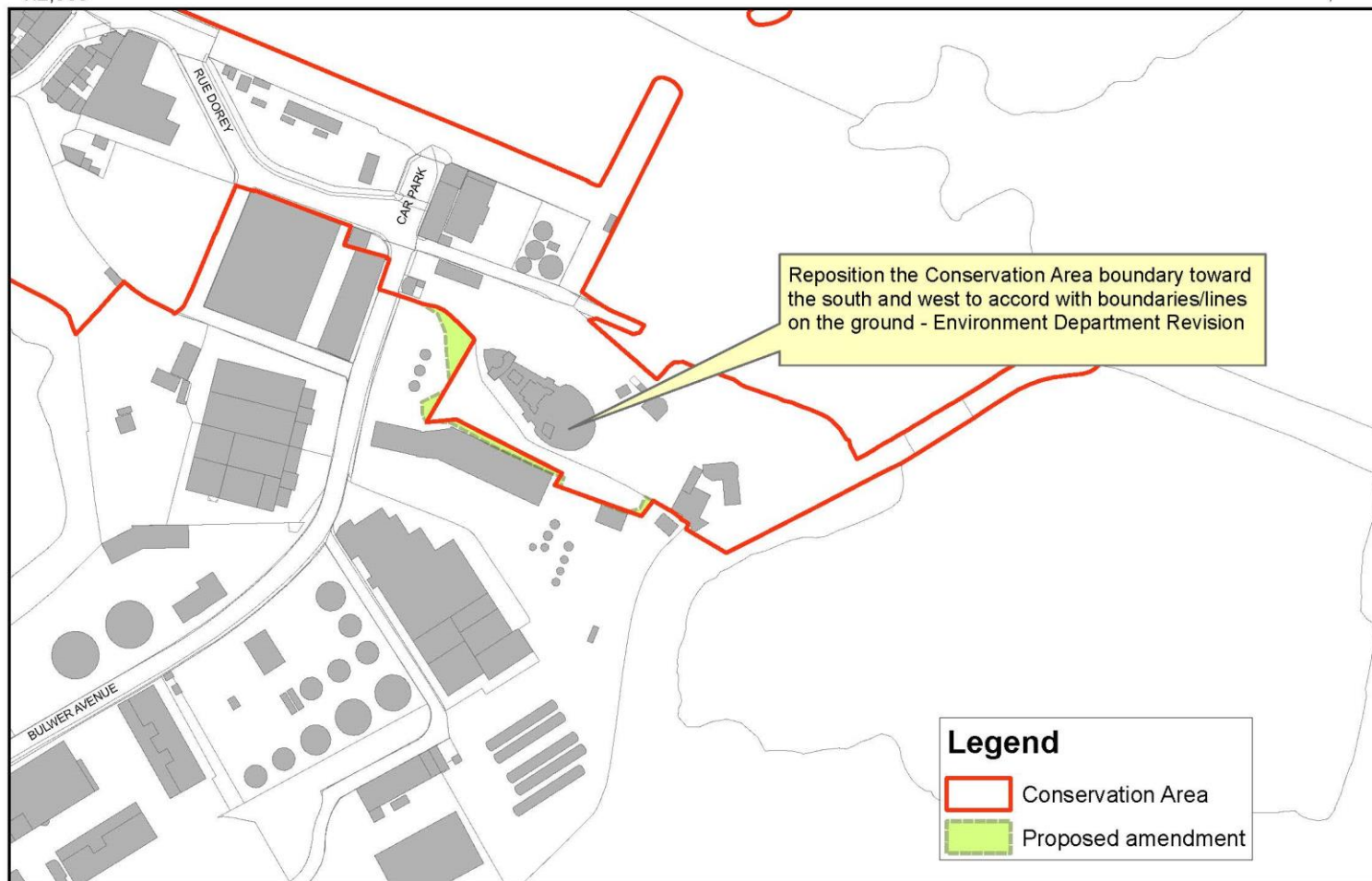


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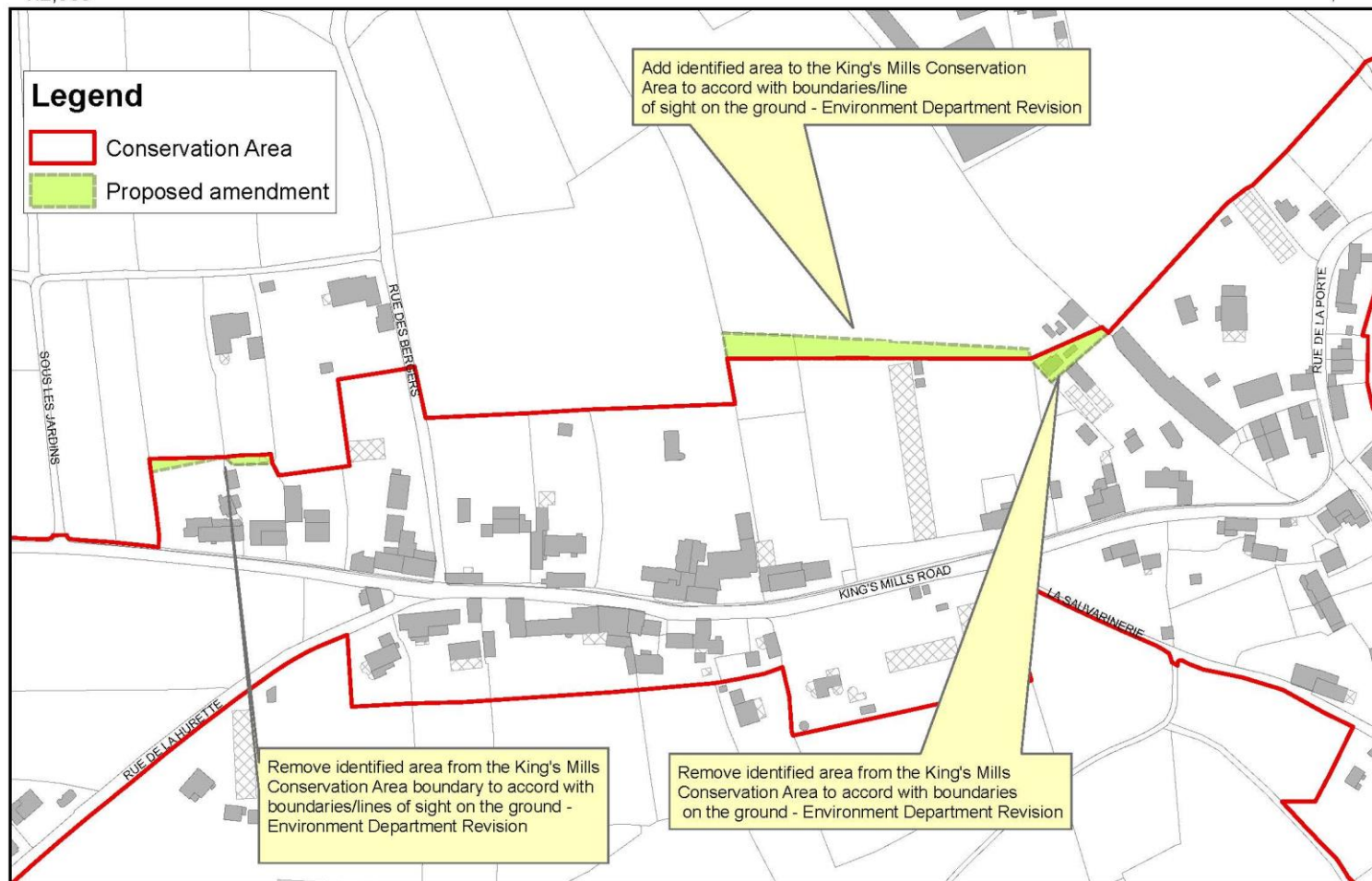


Proposed amendment *Inset 23*

2015



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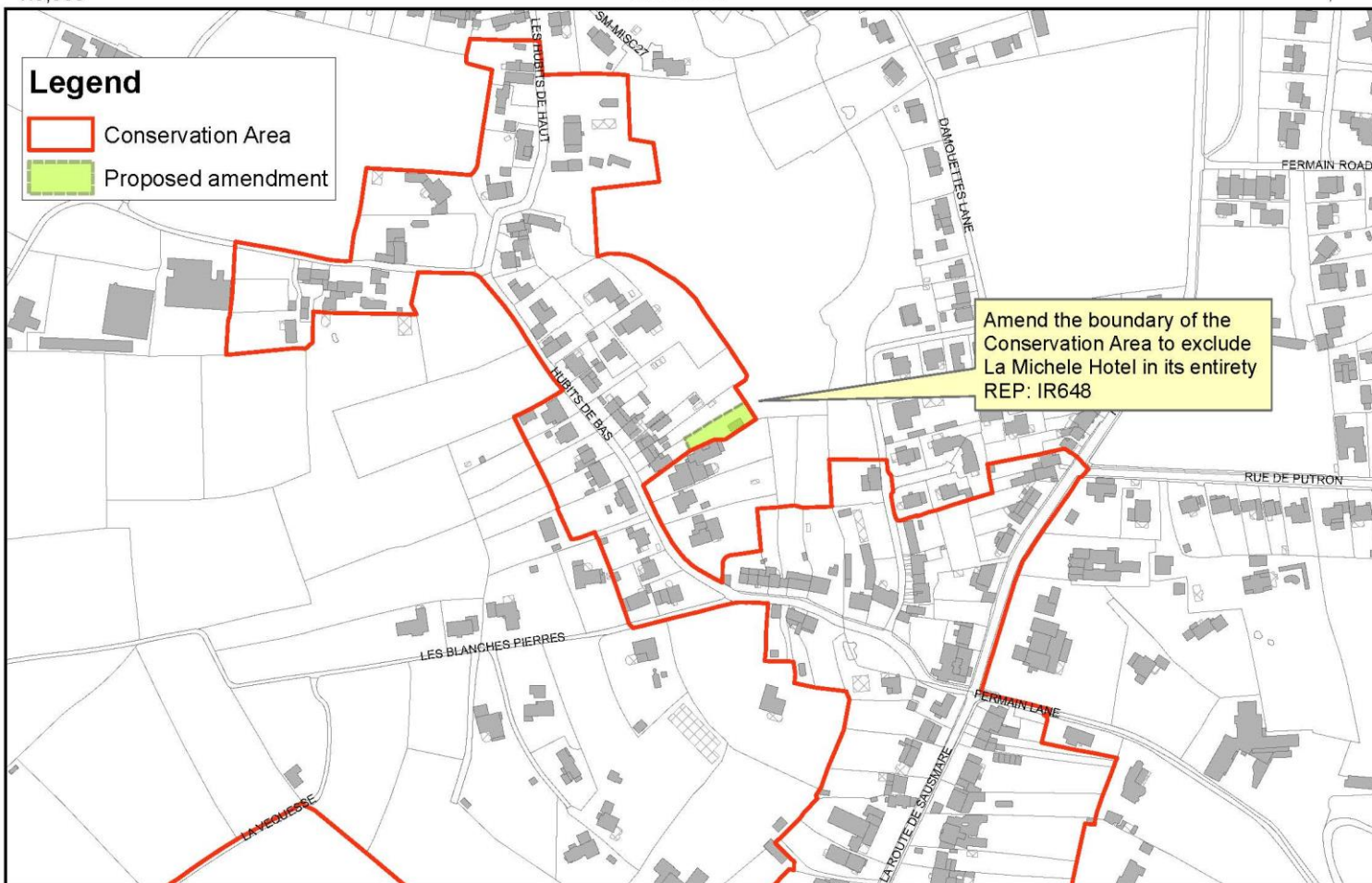
Proposed amendment

Inset 24

2015



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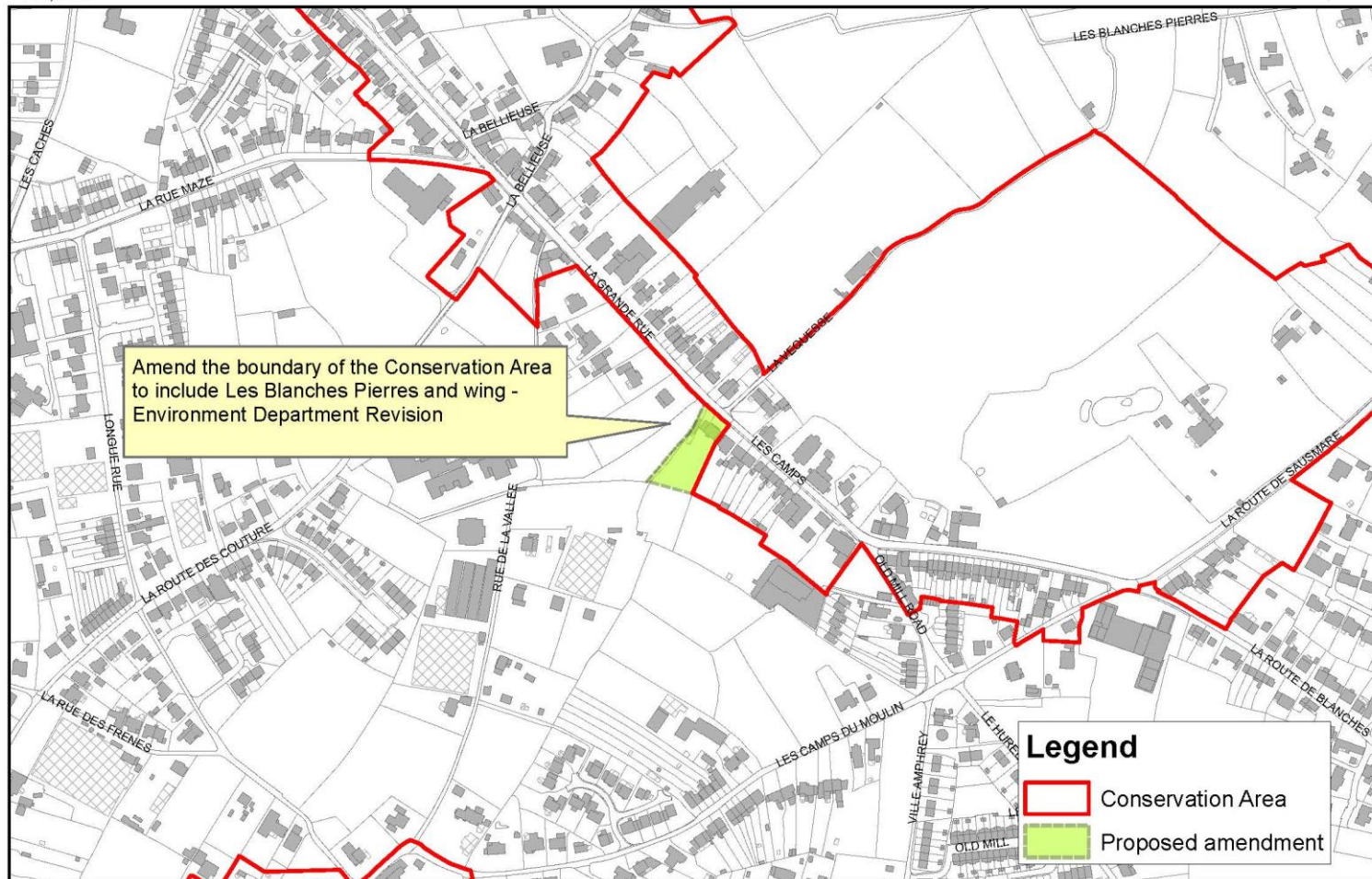
Proposed amendment

Inset 25

2015



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Proposed amendment

Inset 26

2015



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