

REPORT OF THE SECOND CONSULTATION RESPONSES TO POINTUES ROCQUES DRAFT DEVELOPMENT FRAMEWORK

Introduction

A second Draft Development Framework (DF) was prepared by the Planning Service for a potential residential development at Pointues Rocques, St Sampson, which is a site allocated for housing in the Island Development Plan.

The Draft DF was prepared to provide planning guidance on how the site might be developed for housing. The principle of developing this site for housing has already been decided when it was allocated for such as part of the Development Plan process. The DF is therefore aimed at the detail of how the site might be developed, including density, numbers, traffic and access and general design principles.

The site is currently occupied by the St Clair Nursery, plus a dwelling called The Swallows (on Robergerie Road) and six residential units (St Clair House) along with associated parking. The remainder of the site is former vinery land.

The site covers an area of approximately 2.5 hectares (15 vergées). Island Development Plan Policy MC2 requires development in accordance with a DF where 10 or more dwellings are proposed, or where the site area is over 0.25 hectares (1.5 vergées).

First Draft

The first Draft DF was subject of a six week public consultation which closed on the 25th September, 2017. Seventy-six responses were received from members of the public.

The issues expressed during that consultation period principally related (inter alia) to:

- Traffic congestion,
- Roads and road capacity,
- Pedestrians and cyclists,
- the Traffic Impact Assessment,
- the amount of housing proposed,
- overdevelopment
- infrastructure,
- impact on the Conservation Area,
- loss of green space,
- ecology, pollution, etc.
- Some recognised the need to increase the Island's housing stock and generally thought the draft Development Framework was a reasonable document.

One of the most significant issues arising from that consultation was the issue of traffic and access. This was considered fundamental, and would impact on other areas of the Framework.

The first draft DF had suggested that the site could be developed with a single access onto Robergerie Road, provided that some improvements were made to the junction of Robergerie Road with Route Militaire. This was supported by the Traffic Impact Assessment, prepared by ARUP.

However, Traffic and Highways Services had noted that whilst the development could be adequately accommodated using a single access, they challenged whether the modelled peak hour traffic movements heading east through Robergerie Road would work in reality and in the way predicted given that there were already disincentives to use the major roads due to perceived congestion. The impact of one access on vulnerable road users was therefore a concern to THS. In counter argument to this ARUPS considered a significantly inflated traffic movement figure than is likely in reality, and concluded that under the Guidelines for Environmental Assessment of Road Traffic the number of movements resulting from these inflated figures would still be viewed as being unlikely to be detrimental to pedestrians.

However, notwithstanding this, THS commented that in taking into account the importance of assessing the impact of development on vulnerable road users within the Guernsey Road Transport Strategy as well as the policies contained within the Traffic Engineering Guidelines for Guernsey, “on suburban neighbourhood roads, a safe environment should be created for vulnerable road users and through traffic discouraged” (policy NCR02), they remained of the view that there could be benefits in requiring a second access to the site in terms of diluting the traffic flows across the minor roads.

The pros and cons of either one or two accesses were reported to the Authority on 2 May 2018 looking at the benefits for traffic and for pedestrians and other road users, as well as implications on junctions and parking.

Following consideration of the report, and having undertaken a site visit in May 2018, the Authority resolved that the allocated housing site should be served by two vehicular accesses, one from Robergerie Road and one from Rue des Pointues Rocques, in order that additional traffic movements be spread between two roads, rather than concentrated on one.

The first Draft DF was therefore revised to reflect this decision.

Some other changes were made including requiring the relocation of informal unregulated on-street parking from the western end of Pointues Rocques by using an area within the allocated site comprising a maximum of 6 parking spaces, to allow sufficient width for two-way traffic flow on this part of Pointues Rocques, to better manage vehicle movements and the needs of pedestrians.

Second Draft

The second Draft DF was subject of a second six week public consultation, which was to close on the 12th October, 2018 but was extended by a further three weeks to close on 2nd November 2018.

The public were invited to make comments via a press release and media coverage in the Guernsey Press. The various owners of the site were notified by letter. The document was placed on the States website in addition to being available in Sir Charles Frossard House.

A further response was received from Traffic and Highway Services, as well as the Constables of St Sampson. Previous responses from La Societe Guernesiaise, the Police, States Archaeologist, Environmental Health, Property Services and the Fire Service remained largely relevant, and were carried forward. These are summarised in Appendix 1.

Approximately ninety responses were received from members of the public, including some group responses, such as The Delancey Conservation Committee, and the St Clair House Owners Group, and two on behalf of the applicant. These are summarised in Appendix 2.

Issues

The issues expressed during the consultation period principally relate (inter alia) to:

Matters of principle

- Need for more housing,
- Overdevelopment in the north,

Density of development

- Amount of housing proposed,

Traffic matters

- Traffic congestion,
- Roads and road capacity,
- Pedestrians and cyclists,
- Car parking,
- Traffic Impact Assessment,

Environmental matters

- Impact on the Conservation Area,
- Protected Buildings,
- Horticulture,
- Loss of green space,
- Archaeology,

Other

- Infrastructure,
- Residential amenity,
- Motives, Process, Community, etc.
- Specific detailed points,

Comments from the applicants/owners.

Some representations recognise the need to increase the Island's housing stock and generally think the draft Development Framework is a reasonable document.

The matters raised have been considered as set out below. Under each issue heading is a summary of comments received, followed by the Planning Service's response. Where this requires changes to the text this is highlighted in ***bold italics***. For clarity and simplicity these changes have now been made to the text. Additionally a number of more specific detailed matters are listed in Appendix 3 and again changes to the Development Framework text noted in ***bold italics***.

Principle of Housing Development

Need for more housing,

Island does not need more housing, many unoccupied houses, many new-builds unsold, KPMG report reduces need, only need 150 houses per year, IDP needs to be updated, other housing already approved nearby, e.g. Leales Yard, PineTops, Braye Road, etc., and there are

other allocated Housing sites, e.g. Franc Fief, should develop Leale's Yard first, or use Data Park, or surplus school sites.

Response

There are several issues that were raised relating to housing need on the island and these are briefly addressed here.

Principle of development of the site: This site is allocated for housing in the Island Development Plan which means that the principle of housing development on this site has already been accepted. The IDP went through a statutory process of consultation and adoption, supported by States' Members, and any development on the site must be in accordance with the IDP. Prior to the allocation as a housing site, the site was designated as a Housing Target Area in previous development plans.

Vacancies and unoccupied houses: In terms of the view that there are numerous unoccupied houses on the island, the Housing Stock Bulletin 2017 reported a total of 138 vacant dwellings, or 0.5% of the total stock (131 of which were Local Market properties). This data should be used with some caution as the methodology is currently being refined, but it represents our most up to date data and it indicates a very low level of vacant units. Regarding unsold new build homes, it is for the market to ensure appropriate pricing of homes to sell, however there are mechanisms within the IDP to ensure that housing approvals are for an appropriate mix and type of housing that reflects demographic need on the island, which intends to ensure that supply meets the current demand.

Revised Housing Indicator: The States' Strategic Housing Indicator has reduced from 300 units per annum to 127 units per annum. The Strategic Land Use Plan (SLUP) requires that a five year housing requirement can be met, and that there is a two year pipeline housing supply.

Based on the revised indicator of 127 units per year, the pipeline supply is significantly higher than that required by the SLUP. However Development Frameworks, as Supplementary Planning Guidance, must reflect the statutory policies of the IDP and it is not for an individual Development Framework to address the issue of housing supply on the island. Based on the current evidence, it is likely that at the time of the review of the IDP there will be no requirement to identify further land for housing given the current pipeline supply.

It is also important to appreciate that the revised housing indicator is more outcome based than the previous targets. The indicator is based on the need for actual units, not just permissions, since many permissions do not get built. Presently the number of completions is very low.

Develop other sites first: There is no mechanism within the IDP to prioritise the development of one site over another, so whilst there might be other planning approvals in the pipeline, as well as other allocated sites in the area, that would not in itself be a reason to refuse development on this site where it accords with policy. The future of the school sites following the transition to the new secondary model is, as yet, unknown. Should these sites become available for development in the future, then they would be assessed against the planning framework in place at that time.

IDP needs to be updated: Monitoring of the IDP is ongoing. It is also considered appropriate to undertake the planned five year review of the IDP, which will include housing, but there has been no formal request or findings from the monitoring to support review of the IDP any sooner. Development Frameworks will continue to be prepared in accordance with the statutory planning framework, and any planning application submitted will be determined against the planning framework in place at the point of determination.

Overdevelopment in the north

Area is already built up, area is overdeveloped, too many houses, already heavily populated, other areas of the island should be used, St Sampsons is full, Vale/St Sampson overpopulated, too much in the North, new housing should be in south of island, St Sampsons has taken more than its fair share already, Housing Target Areas should be removed, site should not be developed, this site should never have been earmarked, should reconsider the Allocation, it was previously a swap for Duveaux Lane, no need for this HAA

Response

Most of the larger allocated housing sites designated in the IDP are in and around the St Sampson/Vale Main Centre. This distribution of strategic housing land is nothing new however and prior to the States approving the SLUP and the IDP previous development plans since 1991 have shown Housing Target Areas as strategic reserves of housing land in St Sampson/Vale.

Despite the fact that most of the larger allocated sites are within and around the St Sampson/Vale Main Centre, it is anticipated that, as presented as part of the IDP preparation process, the majority of new housing will still fall within and around St Peter Port Main Centre.

As noted above, the IDP went through a statutory process of consultation and adoption, supported by States' Members, and any development on the site must be in accordance with the IDP.

Density of development

Amount of housing proposed

Do not agree with up to 150 homes, where did 40 – 60 per ha density come from, too high, should limit to 20 – 30 per ha, total 50 to 60 houses, will be like highest London Boroughs, should be low density.

Response

Simply for comparison because it has been referred to in representations, housing density in London has been recorded in units per hectare and according to the draft London Plan, the average density across London of new housing approvals in the monitoring year 2015/16 was 154 units per hectare with the highest average density being recorded in Tower Hamlets at 488 units per hectare. Densities such as these would clearly be inappropriate on this site because of the context.

The housing capacity estimates for the Pointues Rocques Allocation Site are based on historic estimates of the housing capacity of each of the HTAs which were calculated using a standard methodology to give a potential range of housing numbers.

The Traffic Study for Guernsey Housing Target Areas Study Report (2010) presents two density scenarios for each of the HTAs, a low density figure and a high density figure. The low density scenario was calculated using the following method:

- 1/3 of site area at 15 dwellings per hectare; and
- 2/3 of site area at 30 dwellings per hectare

The high density scenario was calculated using the following methodology:

- 1 hectare of the site area at 90 dwellings per hectare (sheltered housing);

- 50% of remaining site area at 30 dwellings per hectare; and
- 50% of remaining site area at 50 dwellings per hectare.

For Pointues Rocques, based on a site area of 2.2 hectares, this resulted in the following estimates of density:

Low density development

Housing Target Area	Site area (Hectares)	15 dph	30 dph	Total
Pointues Rocques	2.2	11	44	55

High density development

Housing Target Area	Site area (Hectares)	90 dph	30 dph	50 dph	Total
Pointues Rocques	2.2	90	18	30	138

This was a standard formula applied across all of the HTA sites which for Pointues Rocques resulted in a potential range of between 55-138 dwellings. It is important to emphasise that this is a range, and the likely number of units delivered on the site was expected to fall somewhere within that range.

These figures were calculated on a site area of 2.2 hectares for the Pointues Rocques site, however additional land now forms part of the allocation site with the total site measuring 2.5 ha, including The Swallows on Robergerie and St Clair House, which it is not proposed to redevelop. Using the same calculations as presented above, this would present a range of between 62-150 dwellings. The Traffic Impact Assessment prepared by Arup was based on range of 60-146 dwellings and a site area of 2.4 hectares.

As shown the initial housing figures presented above were based on a standard methodology. Detailed analysis has now been undertaken which takes into account additional factors and up to date information to ensure that the density range and predicted housing numbers more accurately reflect the constraints and opportunities of the site.

The appropriate housing density and mix and type of dwellings for a site is one which:

1. Makes effective and efficient use of the land; AND
2. Respects the character of the surrounding area; AND
3. Is (normally) reflective of the demographic profile of households requiring housing; AND
4. Takes into account any other constraints specific to the site, for example traffic implications, neighbour amenity, infrastructure provision, topography etc.

1. Making effective and efficient use of land does not necessarily mean requiring built development across the entire site. However, densities should be maximised where good standards of design and amenity can be achieved. Whilst there is currently a sufficient pipeline supply of housing, as a finite resource it is important to use land wisely to avoid a situation in the future where significant additional land is required for development which could have been accommodated on other sites.

2. With reference to the character of the area, a basic study of surrounding development shows a range of densities from approximately 9 to 66 dwellings per hectare and includes higher density terraces as well as larger detached properties with larger gardens. The St Clair flats, within the allocation site, are approximately 85 dwellings per hectare. The higher end of the proposed density range on the housing allocation site does not exceed that of some of the surrounding densities, and

providing that the design response is of sufficiently high quality, higher densities than the surrounding area are not precluded. However, what is notable is that there is no uniform density in the surrounding area, and the Pointues Rocques site should reflect this variety, hence there should not be a uniform density across the site. This variety of the built form is a notable aspect of the Conservation Area, as are the open spaces and breaks in built form. Again this will be expected to be reflected in the development.

3. Our analysis of current evidence regarding private market housing suggests a need for homes of 1-3 bedrooms. This is based on the predicted need for private market housing as set out in the KPMG Report for the period 2014-2021, by bedroom. Using the KPMG predicted need 2014-2021 for private housing, the number of private units delivered by bedroom has been subtracted, according to the Housing Stock Bulletin from 2014-2017, to calculate an estimated private housing requirement for 2018-2021. This results in the following:

Bedrooms	Possible Private Housing Requirement 2018-2021			
	Min	%	Max	%
1	33	13	77	17
2	121	46	198	43
3	106	41	180	40
Total	260	100	455	100

There is no outstanding requirement to deliver additional 4 bedroom private market units based on the KPMG predicted requirement and the actual delivery of units between 2014 and 2017. The figures also indicate a move away from a need to deliver 1 bedroom units in the private housing market, so the focus is clearly on 2 and 3 bedroom units.

In terms of affordable housing, there is a need for 1 and 2-bedroom units but there is also a shortage of 4 bedroom properties. The Housing team will continue to advise on the most up to date position.

In the current context, taking into account both private market and affordable housing requirements, there is a need to provide a mix and type of housing incorporating 1-4 bedrooms. The original housing numbers were based on a hectare of the site being developed for sheltered housing (at 90 dwellings per hectare). If sheltered housing were to form part of the proposals then the numbers would be at the upper end of the range, but in the current context, without provision of sheltered housing on the site, the density will reduce because of the requirements for greater private amenity space and facilities than would normally be required as part of a sheltered housing development. However neither should the site be developed at a density of 15 dwellings per hectare, as this would be an inefficient use of the site which would also not reflect the surrounding character of the area.

4. In terms of specific site constraints, there are some areas of the site which are more sensitive, where lower densities, landscape buffers or amenity space might be appropriate as opposed to dense built form, as this will help to ensure that the overall development is of a high quality. The topography of the site and the changes in site levels mean that there are potential amenity and overlooking issues which design, layout and landscaping must mitigate, for example the level changes restrict where taller buildings can be located on the site. There are also infrastructure requirements to accommodate on site such as appropriate pedestrian and cycle infrastructure to enhance connectivity of the area, so a safe, visible publically accessible route through the site will need to be accommodated, as well as parking for cars, bicycles and motorcycles in accordance with published guidance. Other sections of this report consider the traffic implications of the housing numbers.

Conclusion on amount of housing

Taking all of the factors above into consideration rather than applying a standard methodology, it is likely that a density of 30-50 units per hectare could be delivered on this site, or 75 to 125 units, depending on the mix and type of housing required at the point of determination of any planning application on the site. However to achieve the mix and type of housing currently sought it is anticipated that the yield for the site will be towards the middle of this range.

Section 7.10 of the Framework has been revised to suggest 30-50 dwellings per hectare providing a yield of between 75 -125 dwellings. (Second draft said 40-60 per hectare, yielding 100-150 dwellings)

Traffic matters

Traffic congestion

Will create congestion, area already congested, current traffic flows too high, traffic queues, backed up at peak times, gridlock, will exceed capacity of the roads, Pointues Rocques and Robergerie can't take any more traffic, already at the predicted numbers, several near misses, large lorries, caused by moving Fontaine Vinery,

Need a one way system, and traffic calming, strongly oppose a one way system, making Pointues Rocques or Robergerie one way will lead to problems elsewhere, vehicles speed up if one-way, private accesses open onto junction of Robergerie Lane and St Clair Hill, bus stops are on busy road with no pavements, should not have access onto Pointues Rocques, two accesses would still result in same traffic on Route Militaire, a second access does not ease concerns, actually increases concerns.

Response

THS and ARUP advice is that traffic numbers will work, and if density/ housing numbers are reduced, this should ease the situation.

There is no proposal for a one-way system. There is a recommendation that accesses onto Robergerie and Pointues Rocques are designed geometrically to direct traffic westwards, towards Route Militaire (similar to Don Street exit onto St Julian's Avenue, near former Rib Shack)

Roads and road capacity

Road network is inadequate, narrow roads, Robergerie Road is not suitable for two way traffic, it is a lane not a road, cars parked on Pointues Rocques, numerous blind spots, difficult for fire engines to get to site, emergency access is not suitable, lack of pavements, near misses when vehicles drive on pavements, proposed entrance at The Swallows is at a narrow point of Robergerie, neighbourhood roads are used as through roads, Pointues Rocques/Route Militaire junction needs improvement, as well as Robergerie/Route Militaire junction, improvements must be at developers' costs, difficult to ensure cars turn towards Route Militaire, construction traffic must use new access, what happens if junctions can't be improved, what if owners don't agree, will not comply with IP6, IP7, IP9.

Roadway sightlines will be poor, neighbours' cars may block sightlines, can't stop neighbour parking in their driveway, boundary wall to the Swallows is a party wall, it needs lowered, owner may not agree, who will maintain the road/access, will they be adopted.

Response

THS and ARUP advice is that traffic numbers will work. The Authority considered this matter in May 2018 when it decided there should be two accesses to serve the development. It was also a Committee requirement that a number of informal on-street parking spaces be relocated to improve road capacity and safety. Again, if density/ housing numbers are reduced, this should ease the situation.

Pedestrians and cyclists

Lack of footpaths, many people walk in this area, danger spots, have been hit twice by cars, difficult for children to cross the roads, children don't use traffic lights to cross road, no room for cars to pass pedestrians safely, Pointues Rocques not suitable for pedestrians or cyclists, pedestrians have to duck between parked cars, difficulties for walking not mentioned, many vehicles speed, lorries use these roads, NRO2 says a safe environment should be created for vulnerable users and through traffic discouraged, vulnerable road users should be protected, what is being done for pedestrians, shared surfaces are dangerous, painted pavements don't work, walkway behind Pointues Rocques wall is positive, but only goes so far, should provide cycle and pavement link to Delancey Park

Response

THS has considered pedestrians and cyclists and does wish to ensure that vulnerable road users are protected, as far as possible. This issue was the subject of a previous report following the first draft Development Framework. As stated earlier in this report, whilst THS had noted that development could be accommodated using a single access, there would be benefits for vulnerable road users if two accesses were used. This was considered by the Authority in May 2018 and was one of the major considerations that led to the draft Development Framework requiring the site to be served by two vehicular accesses, and informal on-street parking spaces relocated.

Car parking

Not enough car parking, need to future-proof parking provision, many households have more than 2 cars, parking guidelines should not be flexible, what is the point of a standard if it's not applied, limiting to a maximum allows inadequate parking, people will park in surrounding lanes. Will be more than 300 cars extra, or 400, or 500, where will they park, will park on private areas, need more information on access and parking for disabled people.

Moving parking off Pointues Rocques is welcomed, should move 10, removing on-street parking will make little difference, who pays, will cause problems elsewhere, how can it be controlled in the future, banning parking will remove pedestrian refuges for pedestrians.

Response

Making the parking standards a maximum figure (rather than a minimum) was a deliberate policy choice when the IDP was being prepared, as one way of discouraging traffic growth.

Traffic Impact Assessment

TIA is biased, has been commissioned by owner, should be independent, don't believe TIA has looked at all the issues, was done by UK consultants, ARUP have been challenged before on forecasts, should revisit traffic concerns from Traffic and Highway Services, TIA says it is "in support of the proposed development", data does not agree with residents' own experiences, data underestimates traffic, trip generation figures are low, not everyone will work in the north, TIA should consider impact on Delancey Lane and Halfway, Rue Des Monts is a commuter rat run, need to consider the other housing sites, e.g. Franc Fief, etc., 2010 TIA said Robergerie was already congested and not desirable to have more traffic, TRICS not appropriate in Guernsey,

Response

Whilst the TIA was paid for by the applicant, ARUP is a professional organisation, and its advice is considered to be professional. Their report was considered in great detail by THS, and subsequently by the Authority in May 2018, and was not fully agreed, hence the change to requiring two vehicular accesses. Part of ARUP's support for a single access was based on non-traffic matters, such as the loss of a granite wall (this is a planning, or conservation matter, which should be weighed against traffic matters, not dictate them).

Environmental

Impact on the Conservation Area

This is a conservation area, should not build in a conservation area, should not have housing allocation in Conservation Area, site covers almost 50% of Conservation Area, will not conserve or enhance, should preserve a working vinery within a Conservation Area, presumption against development, contrary to policy GP4, no mention of preserving and enhancing, only two paragraphs on the Conservation Area, historic road pattern was one of reasons for designation, should respect the settlement pattern of the conservation area, high wall is part of Conservation Area character, roadside wall should be kept, consider Public Art, flats won't be in keeping, should be detached or small terraces, should not be dense development in a Conservation Area, must not lose character, virtually all buildings in area are 1 or 1½ storey, so new buildings should not exceed that, should not exceed 3 storey building, guidelines should be more specific, how can 3 storey respect existing 1½ or 2 storey, not many terraces within Conservation Area, majority are detached and semi-detached, will remove character and historic features, prehistoric Cyclopean boulders, old, Victorian water tower should be kept and boiler house chimneys, these could be Public Art, Victorian vinery wall is important.

10 important features that make up the Conservation Area, 1 Water Tower, 2 Boiler Chimneys, 3 Pointues Rocques wall, 4 Dry stone wall, 5 Northern boundary wall, 6 Eastern boundary wall, 7 South wall, 8 Water Lily pond (reservoir), 9 Double glasshouse, 10 other glasshouses.

Response

A Conservation Area does not mean nothing can happen, but as stated in the DF does add additional constraints on any development proposal. This will apply to the features referred to, whether or not they are listed in the Development Framework.

Could add the 10 features into the text in paragraph 6.5 describing the Conservation Area, if it is considered necessary. However, as stated above, they will be covered by Conservation Area controls in any case.

Protected Buildings

Does not preserve the setting of the protected building Delancey Park House, breaches policies GP4 and GP5, contrary to Law, The Cottage on Robergerie is a Protected Building, setting should not be described as urban or related to the street, but as semi-rural and related to land to rear, should not demolish The Swallows, it should be protected, 19th century cottage, historic Victorian property, should be included in the Conservation Area, site was part of a Conservation Area in the past.

Response

Any planning application will need to satisfy Policy GP4 and Policy GP5. The wording on the setting of Protected Buildings refers to them generally having an urban setting, and related to the street. This is considered to be correct in terms of position and orientation. The Swallows has previously not been considered worthy of listing as a protected building. The Conservation Area boundary was revised as part of the IDP process, it should not be changed again.

Horticulture

The DF does not say that this is quality glass, in very good condition, used for growing, working vineries should remain, this vinery is a thriving business, one of the few working vineries left on the Island, he's a cold grower with a low carbon footprint, owner has said he foresees increased profitability for remaining growers post Brexit, loss of agricultural land, must preserve agricultural land, we will need to supply our own food, glasshouse makes up approx. 50% of site. Glasshouses are not temporary horticultural structures.

Response

There is often a balance to be struck between continuing horticulture on a site or using it for an alternative use. In this case, this site was a Housing Target Area within the previous Urban Area Plan and more recently has been allocated for housing in the IDP.

Loss of green space

Will remove another green corridor, will spoil the area, impact on the environment, contrary to GP1, and GP3, there are trees that should be protected, boundary planting should remain, will remove almost the last green area of the parish, loss of many green fields, loss of trees and hedgerows, please don't spoil our lane, should retain windbreak conifers, should have an Environmental Assessment as part of Framework, need a green buffer around the existing flats, site provides breathing space, there is wildlife, kites, swifts and swallows in the area, also a pair of buzzards, may be bats, migration birds use Robergerie Wood, need a bat survey, must protect bats, buzzards need trees for roosting and open land for hunting, no provision for ABI, it needs to be protected, important biodiversity, should have community areas, allotments, etc., need more details of Robergerie Wood ABI, should keep reservoir.

Response

It is important that any development makes provision for open space, both private amenity space and more general open space, within the site. A number of the Development Guidelines seek to ensure this, including 7.12, 7.22, 7.23, 7.27 and 7.28.

The Framework notes the sensitivity of the Robergerie Wood ABI (in para. 6.4) and paragraph 7.11 requires a 3m protection zone, inside the northern boundary wall, to protect the trees within the ABI beyond.

Archaeology

Why have archaeology references changed, whole site should have test pits, must investigate and respect any archaeology, site is between remains of the St Clair Chapel and the Neolithic Passage Grave in Delancey Park, need an Archaeological Watching Brief, contrary to GP7, what is to happen if something is found? Archaeology report was commissioned by PF+A.

Response

The archaeology references changed in response to comments received from the States' Archaeologist following consultation on the first draft DF. He noted that he had previously carried out a number of test excavations on the site and that archaeological potential was low. He suggested wording for the paragraphs relating to archaeology. A condition requiring a Watching Brief could be attached to any future planning permission, in accordance with GP7. The archaeology response was not commissioned by PF+A, but was a response to a letter sent by the Planning Service.

Other

Infrastructure

Local infrastructure already saturated, will not cope, need an infrastructure plan, need to consider all the developments in area, Leales Yard, etc., sewers won't cope, will cause flooding, DF must require full details of drainage, for foul and surface water, shops and schools are not within walking distance, no facilities are within walking distance, e.g. doctors, bank, etc., no footpaths at Bus Stops, no direct bus service to The Bridge, no capacity in schools, infant school was closed recently, does not consider a Catholic school to be a facility because it is not available to all. Should be more 1 and 2 bedroom houses, need a community centre, no mention of street furniture.

Response

Guernsey Water, Waste Services and Building Control were consulted on the first draft Development Framework, and raised no objections on infrastructure matters. Education was consulted and did not raise any concerns on schools capacities.

Residential amenity

Noise and air pollution, mess, light pollution, statutory requirement if GHA are present, loss of outlook for existing flats, loss of views, should be more green space, lack of garden space, should control construction hours, need to keep construction access off Pointues Rocques, impact on existing people, and people living in the area, houses to northwest should also have sensitive amenity designation

Privacy, overlooking, will affect well-being of residents, western boundary wall is high on west side, children could fall over, will block views, need details of proposed screening, why refer to views if high wall is to remain, will residents want the estate to have through routes for pedestrians.

Response

Many of these matters are more appropriately considered at the time of determining a future planning application. The DF already sets out some of the matters which require to be considered, adding to the considerations set out in the IDP.

Motives, Process, Community, etc.

Very little has changed, madness, ridiculous, nightmare, previous comments have not all been responded to, previous questions not answered, those who previously commented on the earlier framework should have been contacted by letter or email so that they could submit new comments if they so wished.

This is all about making money, financial gain for the developer, must think of needs of locals, will not serve residents, whoever agreed change of use has no understanding of the area and should not be working for the States, should listen to residents, points of Law being ignored, will not hesitate to challenge anything contrary to Land and Planning Law,

Moral conflict, application has already been submitted, framework needs to be decided before application determined, should not have accepted planning application in advance of Development Framework, should be withdrawn, what is going on, residents feel excluded from process, any application should be for the full site, have ignored the march, any planning application should be clear about social and intermediate housing, problems mixing affordable and private housing, previous objectors should have been informed.

Should have a Community Plan, were not sufficiently informed, Community Plan could feed into a Development Framework, could determine density, could determine Public Art, need official inquiry, public had no input to Allocated sites, or how the Target Areas were chosen.

Development will be on high ground, will be very visible, contrary to GP8 and GP9, don't want development to be prominent, suggest scaffold poles be used as mock up,

Development must be comprehensive, must prevent piecemeal, could be building work over a long time, could take up to 10 years, could be left with empty site like the Data Park, may be unfinished, will contravene policy GP10, site is in multiple ownership, contrary to policies S2 and MC2

Not unsympathetic to some form of development, need housing, need affordable housing, but not at this site, recognise site has been identified for housing in the IDP.

Response

Some previous comments and questions were not responded to between the first and second Draft DFs because the issue of traffic and the number of accesses was considered fundamental to the DF and needed to be resolved first. Many of the previous comments have been repeated and have been picked up this time round.

Notifying those who previously commented would have required more resources than the Service has available. However, the draft DF has been widely advertised via a press release and media coverage in the Guernsey Press, TV and Radio. The various owners of the site were notified by letter. The document was placed on the States' website in addition to being available in Sir Charles Frossard House. It is clear from the number of representations received that it was widely known about.

The motives of the developer are not a material planning matter. The site is allocated as a housing site in the IDP, so the principle of housing has already been decided.

The Planning Service cannot refuse to accept a Planning Application which is submitted in accordance with the procedures set out in the Law, but it cannot determine an application for a development which requires a DF until there is an approved DF. The submitted application has been on hold since it was submitted, awaiting the approval of a DF.

The requirements for affordable housing are set out in GP11 in the IDP, there is no need to repeat them in the DF.

Specific detailed points

A number of comments related to specific matters such as words, phrases, punctuation as well as to errors in labelling some photographs or diagrams. These are listed in the appendix 3 attached to this report.

Applicant/owner comments

The applicants and owners wrote to say they fundamentally support the DF but wish to make representations on four key points;

Access, Pointes Rocques HTA was considered under previous Urban Area Plan, a traffic study in 2010 relied on a single access, The Swallows was purchased to provide access to the site, it was included in the allocated site, THS was in support, the draft DF accepted a single access, the TIA and Ove Arup still favoured a single access, THS accepted it was workable, struggle to see benefits of a second access, but it has disadvantages in that walls need to be altered and traffic affects two roads, only benefit seems to be perception that safer for pedestrians, single access would mean no through traffic through the allocated site, NCR02 seeks safe environment for vulnerable road users and through traffic discouraged, should revert to Arup advice and revert to single access, could require traffic leaving site to travel west, so no impact to east, could add a painted footway on Robergerie, could improve Robergerie junction with a painted box to limit number of vehicles queueing at stop line.

Response: A single access was initially considered, but the Authority considered this matter in May 2018 when it decided there should be two accesses to serve the development because two accesses will provide significant benefits, including improved safety for pedestrians and other vulnerable road

users. Junction improvements are required at the Robergerie junction, and a painted box would not improve sightlines or turning movements.

Granite wall is worthy of retention, adds to local distinctiveness, will have adverse effect on Conservation Area.

Response: The granite wall is recognised as an important feature contributing to the character of the area, and the conservation area but this does not mean it cannot be altered, or demolished and rebuilt. Generally walls are expected to remain, but if one wall requires to be altered, this can be considered.

Surprised that our letter (media release) referred to the TIA having been on instruction from the landowner.

Response: It is a matter of fact that the TIA was paid for by the applicant, but the advice is considered to be professional, as referred to above. The matter discussed above under the heading Traffic Impact Analysis

Using land for a second access is not an efficient use of land, contrary to Plan Objective 1, additional access will require loss of much of boundary wall contrary to SLUP Objective 2 to manage the built and natural environment.

Response: The Authority has considered the issue of one or two accesses in May 2018 and has concluded that two accesses will provide significant benefits, and therefore the site should be served by two accesses.

Summary

The second Draft DF has now been revised to address many of the comments and representations received. Changes have been made particularly in relation to overall numbers and density, and in other cases explanations have been included in the report above.

Summaries of the comments received are attached as appendices to this report. The Planning Service response to the specific detailed points is also included.

Due to the number of changes, many of which are minor, the text of the Development Framework has already been edited to include these changes, in order to provide a more readable document. Where changes have been made to the text of the Development Framework, references to these changes are highlighted within this report and the appendices by ***Bold Italics***.

Members will need to carefully consider the content of all representations, together with officer responses and recommendations, before finalising a DF for the Pointues Rocques site.

Once finalised, the DF will provide a valuable supplementary policy context for determining any subsequent planning application(s) for the site.

Summary of Consultation responses

Traffic and Highway Services

A few of the issues identified in the first draft framework remain in the latest. These relate to:-

4.3. Bus Routes (4.3 in latest framework) – There is no guarantee of provision of a school bus to St Sampsons High School from the bus stop closest to this site, because it falls within 2 miles of the school. THS still consider the brief is slightly misleading in this regard.

Response: Reference to school buses to St Sampsons High School omitted.

5.3 Rue des Pointes Rocques/St Clair Hill Junction (4.15 in latest framework) – Framework indicates that visibility is limited by walls on either side of the junction. The sightline to the south exceeds the minimum recommended 33m standard, it is solely the sightline to the north that is substandard.

Response: Text altered to specifically refer to the wall to the north.

5. Image 4 Local Accessibility (4.16 in latest framework) – The plan shows no footway in Rue des Monts to the south and north of the junction with Rue des Pointues Rocques. This is inaccurate as there are sections of footpath installed. There is also a section of Robergerie Road with a footway.

Response: Text on diagram altered to refer to limited or no footway.

With regard to other matters relating to the revised brief:-

4.9. There may be a numbering issue with regard to the photos

Response: Error, now corrected.

6.3 The brief refers to ARUP’s opinion that the 2 access option would have more adverse impact due to effect on traffic at the St Clair Hill/Rue des Pointues Rocques junction and that Rue des Pointues Rocques would require significant changes to support increased traffic volumes. In 6.20 of the TIA it states that single access option is supported for a variety of reasons such as dispersal of traffic and car parking.

The view of THS is that the “significant changes” element is perhaps misleading because the change in terms of Pointues Rocques would likely be the loss of parking and junction sightline works. “Significant changes” may paint a different picture.

Response: Point taken, text altered to refer to change, rather than significant change.

7.11 Reference is made to the granite boundary walls generally expected to remain but significant changes will be required to the wall bordering Pointues Rocques should a new access be created.

Response: Generally walls are expected to remain, but if one wall requires to be altered, this can be considered.

7.29 & 7.31 DF mentions accesses being designed to accommodate public service vehicles. For THS this means vehicles like buses used for public services. In the Traffic Engineering Guidelines for Guernsey there is a vehicle standard of Service Vehicle, is this what was meant?

Response: *The Development Framework is referring to vehicles which would service any development, e.g. refuse lorry, etc. Text amended to refer to service vehicles rather than public service vehicles.*

7.32 This paragraph mentions removal of parking in Pointues Rocques for road capacity reasons. In this context, perhaps wording along the lines of a requirement for removal of parking in Pointues Rocques to improve road capacity and provide additional space for vulnerable road users.

Response: *The removal of parking is proposed for reasons relating to both road capacity and additional space for vulnerable road users. Text amended to include reference to vulnerable road users.*

With regard to the reference to the access to St Clair House being limited to serving the car park and emergency access, is there a reason why cycle or pedestrian access to the Housing Allocation Site is not being accommodated through this access?

Response: *It is intended that this access will be used by cyclists and pedestrians. Text amended to include reference to bicycle and pedestrian use.*

7.33 There is inconsistency between this paragraph and THS comment that access adjoining Pointues Rocques must meet recommended standards and improvement needed to sightline in direction of oncoming traffic onto Route Militaire.

Response: *Paragraph wording changed to say "measures will be considered" rather than may be.*

Constables of St Sampson

Not opposed to development in the Parish, but effects of this development have not been adequately assessed. Volumes of traffic. Road network will fail to support.

Needs comprehensive traffic and infrastructure plan, SLUP 2011 not actioned, SLP35 coordinate land use and road strategies, SLP36 safe access, etc., Traffic data used is out of date.

IDP will result in almost 1400 new dwellings in St Sampson, need full assessment of impact, TIA is questionable, not impartial, does not study half-way junction, struggles to make a case, should have concluded totally impractical at this stage. ARUP and THS can't agree on one or two accesses.

Either access option would make an already difficult situation worse.

Pedestrians no less vulnerable with two accesses. Policy NCR02 requires a safe environment.

No facilities for walking to shops and services, no schools nearby school capacities, students at risk when walking, where will storm water go?, roads narrow, one 2.75m, parked cars on roads,

The need for housing has reduced. Hundreds of parishioners are opposed, none in favour.

Response: These matters are discussed generally within the main report.

Previous consultations – carried forward

La Societe Guernesiaise

Site has become partly derelict and likely to have relatively high level of diversity in terms of habitats or associated wildlife. May be possible to retain an appropriate proportion of green space in terms of private or communal gardens.

Future development does represent a threat to the Robergerie Wood ABI. Species rich grassland are locally threatened and can take decades to reach potential. Opportunities to enhance nature conservation value of site. Recommend a list of tree species for planting. Recommend an ecological survey ahead of any demolition. Beneficial to include bird and bat boxes.

Response: These matters are discussed generally within the main report, under Loss of green space.

Police

Attributes of Crime Prevention Through Environmental Design (CPTED) be considered;

Access and movement.....well-defined routes, with spaces and entrances that provide for convenient movement without compromising security.

Structure..... so that different uses do not cause conflict.

Surveillance..... where all publicly accessible spaces are overlooked

Ownership.....promote a sense of ownership, respect, territorial responsibility and community.

Physical Protection..... include necessary well designed security features.

Activity.....appropriate level of human activity creates a reduced risk of crime and a sense of safety.

Management and maintenance..... designed to discourage crime now and in the future.

Response: These matters apply generally to development and will be considered at planning application stage.

States' Archaeologist

Has carried out two small excavations, and concluded that archaeological potential is very low.

Suggested rewording for paragraphs 7.3, 10.8 and 11.6

(Note: these are now paragraphs 5.11, 6.11 and 7.39)

Response: These suggestions are incorporated within the Development Framework, as noted.

Environmental Health

Concern relating to potentially contaminated land. Phased contamination condition recommended.

Potential noise nuisance during development, CEMP recommended

Response: The Development Framework includes these requirements in Section 9.

Property Services

No comment to make

Response: No response required

Fire & Rescue Service

No objections to proposed 100-150 housing development

Have already had a meeting to discuss requirements for emergency access.

Response: No response required

Summary of Representations

76 letters of representation, objecting on various grounds;

Very little has changed, madness, ridiculous, nightmare, previous comments have not all been responded to, previous questions not answered, those who previously commented on the earlier framework should have been contacted by letter or email so that they could submit new comments.

Island does not need more housing, many unoccupied houses, many new-builds unsold, not an efficient use of land, who is going to buy these houses, KPMG report reduces need, need is now half what it was, only need 150 houses per year, 97 – 157, IDP needs to be updated, the proposed mix and type of dwellings is not reflective of current needs, housing targets were based on out of date info, population is stable or falling, too many low cost houses unsold in the area, no need, Leale's Yard already approved, other housing already approved nearby, Pinetops, Braye Road, etc., scale of development is too much, Data Park and Extension Vinery approved, there are other allocated Housing sites, e.g. Franc Fief, should develop Leale's Yard first, or use the Data Park, could build on surplus school sites.

Area is already built up, area is overdeveloped, too many houses, already heavily populated, other areas of the island should be used, St Sampsons is full, Vale/St Sampson overpopulated, too much in the North, would support a much smaller development, should be low density, new housing should be in south of island, should use other sites without traffic problems and not in Cons Area, St Sampsons has taken more than its fair share already, Housing Target Areas should be removed, site should not be developed, , this site should never have been earmarked, should reconsider the Allocation, it was previously a swap for Duveaux Lane, no need for this HAA.

Do not agree with up to 150 homes in Pointues Rocques area, where did 40 – 60 density come from, too many houses, should limit to 50, or 60 maximum, density should be 20 – 30, density too high, will be like highest London Boroughs, should be low density, too many buildings, too high, should not exceed three storeys, should be detached or small terraces, could be retirement bungalows, will get worse.

Congested, choca block, current traffic flows too high, already heavily trafficked, traffic queues, backed up at peak times, more traffic, too much traffic, will create congestion, have been hit twice by cars, several near misses, will exceed capacity of the road, Pointues Rocques and Robergerie can't take any more traffic, not just for work but for schools, peak times traffic, traffic caused by moving Fontaine Vinery, large lorries, volumes of traffic, gridlock, don't believe TIA has looked at all the issues, was done by UK consultants, cars are used for multiple journeys, several schools around, Pointues Rocques is used to walk to schools, painted pavements don't work, contra-flow cycle lane is not safe, traffic forecasts are low, estimate of traffic going east is low, existing numbers are at the predicted numbers, ARUP have been challenged before on forecasts.

Lack of footpaths, danger spots, difficult for children to cross the roads, children don't use traffic lights to cross road, no room for cars to pass pedestrians safely, Pointues Rocques not suitable for pedestrians or cyclists, should retain whole granite wall, will residents want the estate to have through routes for pedestrians, many vehicles speed, speed unnecessarily, pedestrians have to duck between parked cars, vehicles use the pavements on Vale Road, roads not safe for pedestrians, many people walk in this area, difficulties for walking not mentioned, lorries use these roads, NR02 says a safe environment should be created for vulnerable users and through traffic discouraged, don't want others using the "emergency access", not wide enough, footway will allow people to

walk through private car parking area, entrance by flats is unsuitable for emergency access, what is being done for pedestrians, shared surfaces are dangerous, walkway behind Pointues Rocques wall is positive, but only goes so far.

Road network is inadequate, narrow roads, Robergerie Road is too narrow for two cars to pass, not suitable for two way traffic, cars parked on Pointues Rocques, numerous blind spots, difficult for fire engines to get to site, emergency access is not suitable, vehicles would not have clear access, should provide cycle and pavement link to Delancey Park, lack of pavements, near misses when vehicles drive on pavements on Vale Road and St Clair Hill, Robergerie is a lane not a road, proposed entrance at The Swallows is at a narrow point of Robergerie, neighbourhood roads are used as through roads, Pointues Rocques/Route Militaire junction needs improvement, as well as Robergerie/Route Militaire junction, junction improvements must be at developers costs, a second access does not ease concerns, actually increases concerns, difficult to ensure cars turn towards Route Militaire, how can you force cars to turn a particular direction, construction traffic must use new access, what happens if junctions can't be improved, what if owners don't agree, need guarantee that improvements will happen, will not comply with IP6, IP7, IP9, we are being encouraged to cycle and bus and use alternative transport.

Not enough car parking, need to future-proof parking provision, many households have more than 2 cars, average is over 2 cars per household, amendments on car parking insufficient, removing on-street parking will make little difference, moving parking off Pointues Rocques is welcomed, relocating parking will cause problems elsewhere, don't agree with relocating parking, who pays for the relocation, how can it be controlled in the future, will be more than 300 cars extra, or 400, or 500, where will they park, will park on private areas, banning parking will remove pedestrian refuges for pedestrians, need to relocate 10 cars, parking guidelines should not be flexible, what is the point of a standard if it's not applied, limiting to a maximum allows inadequate parking, people will park in surrounding lanes, need more information on access and parking for disabled people.

Need a one way system, and traffic calming, strongly oppose a one way system, making Pointues Rocques or Robergerie one way will lead to problems elsewhere, would have to travel further, as happened at St Sampson School, vehicles speed up if one-way, Private accesses open onto junction of Robergerie Lane and St Clair Hill, bus stops are on busy road with no pavements, should not have access onto Pointues Rocques, vulnerable road users should be protected, impacts on Braye Road, difficult to get out of Pointues Rocques, two accesses would still result in same traffic on Route Militaire, would affect two roads, Route Militaire/Braye Road regularly has long queues.

TIA is biased, has been commissioned by owner, should be independent, should revisit traffic concerns from Traffic and Highway Services, TIA says it is "in support of the proposed development", data does not agree with residents' own experiences, data underestimates traffic, recorded nearly 700 vehicles on Pointues Rocques between 7.15 and 9.15, references to job opportunities determining traffic flows are misleading, not everyone will work in the north, Rue Des Monts is a commuter rat run, should include school traffic and work traffic, TIA should consider impact on Delancey Lane, and impact on Halfway, background data is questionable, trip generation figures are low, need to consider the other housing sites, should have considered Franc Fief, previous TIA in 2010 said Robergerie was already congested and not desirable to have more traffic, TIA has errors in assumptions, the data is out of date, TRICS not appropriate in Guernsey.

Local infrastructure already saturated, will not cope, need an infrastructure plan, need to consider all the developments in area, Leales Yard, etc., sewers won't cope, will cause flooding, DF must require full details of drainage, for foul and surface water, surface water can cause flooding at present, will need to invest in drainage, main drainage insufficient, shops and schools are not within

walking distance, no facilities are within walking distance, e.g. doctors, bank, etc., no footpaths at Bus Stops, no direct bus service to The Bridge, Pressure on schools, no capacity in schools, schools at capacity, infant school was closed recently, increased use of St Sampson High, does not consider a Catholic school to be a facility because it is not available to all.

Roadway sightlines will be poor, neighbours cars may block sightlines, can't stop neighbour parking in their driveway, who will maintain the road/access, will they be adopted, what about roads within the development, additional access insufficient, boundary wall to the Swallows is a party wall, it needs lowered, owner may not agree.

This is a conservation area, should not build in a conservation area, site covers almost 50% of Conservation Area, will not conserve or enhance, should preserve a working vinery within a Conservation Area, presumption against development, contrary to policy GP4, no mention of preserving and enhancing, only two paragraphs on the Conservation Area, historic road pattern was one of reasons for designation, should respect the settlement pattern of the conservation area, high wall is part of Conservation Area character, roadside wall should be kept, consider Public Art, flats won't be in keeping, should not be dense development in a Conservation Area, must not lose character, virtually all buildings in area are 1 or 1½ storey, so new buildings should not exceed that, should not exceed 3 storey building, guidelines should be more specific, how can 3 storey respect existing 1½ or 2 storey, not many terraces within Conservation Area, majority are detached and semi-detached, will remove character and historic features, prehistoric Cyclopean boulders, old, Victorian water tower should be kept and boiler house chimneys, these could be Public Art, Victorian vinery wall is important, should not have housing allocation in Conservation Area.

10 important features that make up the Conservation Area, 1 Water Tower, 2 Boiler Chimneys, 3 Pointues Rocques wall, 4 Dry stone wall, 5 Northern boundary wall, 6 Eastern boundary wall, 7 South wall, 8 Water Lily pond (reservoir), 9 Double glasshouse, 10 other glasshouses.

Does not preserve the setting of the protected building Delancey Park House, breaches policies GP4 and GP5, impacts on setting of protected buildings, contrary to Law, The Cottage on Robergerie is a Protected Building, setting should not be described as urban or related to the street, but as semi-rural and related to land to rear, will turn a beautiful semi-rural and horticultural area into a large urban Ghetto.

Should not demolish The Swallows, it should be protected, 19th century cottage will be demolished for access, demolition of an historic Victorian property, threatens character of the Conservation Area, The Swallows should be included in the Conservation Area, site was part of a Conservation Area in the past, a previous development in the Conservation Area had to face the road, Glasshouses are not temporary horticultural structures.

The DF does not say that this is quality glass, used for growing, Working vineries should remain, this vinery is a thriving business, should regenerate glasshouse industry, loss of agricultural land, must preserve agricultural land, we will need to supply our own food, this vinery appears to be in very good condition, owner has said he foresees increased profitability for remaining growers post Brexit, he's a cold grower with a low carbon footprint, we should use derelict sites, one of the few working vineries left on the Island, makes up approx. 50% of site.

Will remove another green corridor, will spoil the area, impact on the environment, contrary to GP1, and GP3, there are trees that should be protected, trees should remain, boundary planting should remain, will remove almost the last green area of the parish, loss of many green fields, loss of trees and hedgerows, please don't spoil our lane, should retain windbreak conifers, should have an

Environmental Assessment as part of Framework, need a green buffer around the existing flats, site provides breathing space, there are kites, swifts and swallows in the area, also a pair of buzzards, may be bats, migration birds use Robergerie Wood, need a bat survey, must protect bats, buzzards need trees for roosting and open land for hunting, no provision for ABI, important biodiversity, green spaces, green lung, wildlife, should have community areas, allotments, etc., need more details of Robergerie Wood ABI, ABI needs protected, should keep reservoir.

Why have archaeology references changed, whole site should have test pits, must investigate and respect any archaeology, site is between remains of the St Clair Chapel and the Neolithic Passage Grave in Delancey Park, need an Archaeological Watching Brief, contrary to GP7, what is to happen if something is found? Archaeology report was commissioned by PF+A.

Noise and air pollution, mess, light pollution, statutory requirement if GHA are present, loss of outlook for existing flats, loss of views, should be more green space, lack of garden space, should control construction hours, need to keep construction access off Pointues Rocques, impact on existing people, and people living in the area, houses to northwest should also have sensitive amenity designation.

Privacy, overlooking, will affect well-being of residents, western boundary wall is high on west side, children could fall over, will block views, need details of proposed screening, why refer to views if high wall is to remain.

Development will be on high ground, will be very visible, contrary to GP8 and GP9, don't want development to be prominent, suggest scaffold poles be used as mock up.

Should be more 1 and 2 bedroom houses, need a community centre, no mention of street furniture.

This is all about making money, financial gain for the developer, must think of needs of locals, will not serve residents, whoever agreed change of use has no understanding of the area and should not be working for the States, should listen to residents, points of Law being ignored, will not hesitate to challenge anything contrary to Land and Planning Law.

Moral conflict, application has already been submitted, framework needs decided first, should not determine application until Framework is resolved, residents feel excluded from process, should not have accepted planning application in advance of an approved Development Framework, should be withdrawn, what is going on, any application should be for the full site, have ignored the march, any planning application should be clear about social and intermediate housing, problems mixing affordable and private housing, previous objectors should have been informed.

Should have a Community Plan, were not sufficiently informed, would have liked to have prepared a community plan, Community Plan could feed into a Development Framework, Community Plan could determine density, could determine Public Art, need official inquiry, public had no input to Allocated sites, or how the Target Areas were chosen.

Development must be comprehensive, must prevent piecemeal, could be building work over a long time, could take up to 10 years, could be left with empty site like the Data Park, may be unfinished, will contravene policy GP10, site is in multiple ownership, contrary to policies S2 and MC2.

Not unsympathetic to some form of development, need housing, need affordable housing, but not at this site, recognise site has been identified for housing in the IDP.

Specific parts of the Draft Framework, and responses:

Image 1 – The text ‘La Robergerie’ is wrongly placed at Rue Queripel.

Response: This is the extract from the IDP Proposals Map. The base mapping is from Digimap and La Robergerie refers to the area rather than the specific road name. There is no error.

Para 4.1 –The site is not within a low lying area, it is one of the highest points, with views over a lot of the Island. There are fields to north and east, site does not “adjoin” built-up area, the immediate area is not particularly dense, distinctly rural, woodland and farms.

Response: The text notes that the site itself is on the side of a hill. The surrounding area is varied, as set out in paragraph 4.1. It is the area, rather than the site, which adjoins The Bridge.

Para 4.3 – The area is only served by one bus, number 21, which runs hourly after 9.15am and stops at 7.15pm. No buses go north on Route Militaire

Response: The text is referring to the surrounding area, not specifically to the bus stop closest to the site. Text revised to make this clearer.

Additional text added to clarify that the weekday number 21 runs hourly from 9.15am to 7.15pm and from La Fontaine at 0725, 0755, 0850 (or 0825 in school holidays) More frequent buses are available at Halfway, serving Town and The Bridge, plus services to Pembroke and L’Islet.

Para 4.7 – The character of the conservation area derives from eclectic mix, not uniformity,

Response: The paragraph refers to both the unity of built form and the variety of building sizes and shapes. Both contribute to character.

Para 4.8 – Is the additional constraint singular or plural?

Response: Either could be acceptable, but text should be consistent, so changed to plural

Page 5, Photo 6 – The terrace is on Mont Morin but not named.

Response: The purpose of the photo is to illustrate examples in the area, not specifics. It has now been named.

Para 4.9 – There is reference to The Cottage (photo 7), but no photo 7.

Response: Error, now corrected, should be Photo 2, which is labelled ‘The Cottage’.

Para 4.9 – Reference to Delancey Park House on Rue des Monts (photo 5), but photo 5 is Alta Vista.

Response. Error, now corrected, should be Photo 4, which is labelled Delancey Park House.

Para 4.15 – Even one car prevents turning into Robergerie, not two or more

Response: It may depend on the position of one car, but text changed to omit two.

Para 4.16 –Reference to Image 6 showing bus stops, but should be Image 5.

Response: Error, now changed, should be Image 5, which is labelled local accessibility map.

Image 5 – Refers to La Fontaine bus stop. There isn't a bus stop at La Fontaine.

Response: La Fontaine is the name of the bus stop as referred to in the timetable and on the online route mapping.

Image 5 – The roadside footway is illustrated on the wrong side of the road.

Response: The image is intended to be indicative to show there is a footway on that road, rather than the exact positioning.

Para 5.1 – Previous Image 9 has been omitted. Image 9 showed boundary wall as 3.1m on viney side, but it is higher on other side.

Response: Image 9 could be re-added, if required, but most of the information is on other images. The height outside the site will have little influence on future development.

Para 5.2 – Need more detailed description of Victorian water tower and tank

Response: The purpose of the Development Framework is to provide planning guidance for future residential development. A more detailed description would have little, if any, influence on such guidance.

Para 5.2 – Where is Waters Rocque?

Response: Additional text added to explain it is an area of land to the south of Pointues Rocques.

Para 5.5 – References to photos of T14, T26 & T28 is confused.

Response: Error, now corrected, whilst the photos are all correctly labelled on page 10, the photo and page numbering got mixed up during redrafting.

Para 5.6 –Reference to Image 12 should be Image 9.

Response: Error, now corrected, should be Image 9, which is labelled Land Ownership.

Para 5.7 – Land drops to south, not rises (Digimap says otherwise) there are also views to South cliffs,

Response: This may depend on whether we are referring to the actual site, which does slope slightly towards north, or to surrounding land, which slopes to the south.

Para 5.10 – Surface water does not work well at present

Response: The paragraph does not say it works well, just notes that the storage reservoir plays a role at present.

Para 6.1 – Document states that the western end of Robergerie Road is very restricted, whereas it is the eastern end that is very narrow.

Response: Error, corrected, and additional text added. The eastern end is restricted for two way traffic, including parts where vehicles cannot pass a pedestrian with a pram or bicycle. Also parts of western end are restricted

Para 6.1 – Document states that double right angled bend is in the eastern section of Pointues Rocques, whereas it is in the centre

Response: Partly agreed, but it is to the east of centre. Text amended.

Image 11 –Image 11 seems to show a different arrangement along the northern boundary

Response: The green colouring along the boundary was confusing and has been changed to dark blue. The highlighting is just to indicate an area to think about.

Image 15 – The brick chimneys are well over a century old so can't be described as temporary,

Response: Temporary is intended to refer to their temporary use, related to horticulture. They are no longer in use.

Para 7.7 – 3 storey buildings are exception, not the rule, should be more specific about how to integrate,

Response: The details of design and how to integrate with the surroundings are the task of the designer or architect. It is not intended that the whole site would be 3 storey, but there is scope for parts of it to be 3 storey, if designed appropriately.

Para 7.10 – Where do density figures come from, should point out benefits of lower density, object to density.

Response: These are explained in the main report, and have changed: See main report under heading Density of Development. Section 7.10 of the Framework has been revised to suggest 30-50 dwellings per hectare providing a yield of between 75 -125 dwellings. (Second draft said 40-60 per hectare, yielding 100-150 dwellings)

Para 7.11 – Should refer to image 16, not 13

Response: Error, now corrected - typo from reorganising text

Image 16 – Should have an arrow to show proposed southern access, similar to northern (also image 15)

Response: The precise position for the access has not yet been determined, and there may be more than one option, hence a "zone" is indicated, rather than a specific point.

Image 16 – Should not show footpaths through private car park

Response: The arrows were intended to be indicative only, and any footpaths should not go through the private car park. Diagram has been corrected.

Para 7.30 – Use of the word encouraged is fanciful, only acknowledges the problem.

Response: The intention is that the accesses would be designed with a geometry which makes it very difficult to turn the wrong way, (similar to the exit from Don Street onto St Julian's Avenue, near the former Ribshack)

Para 7.31 – Junction improvements are important.

Response: Agreed, framework states alterations are required.

Para 7.34 – Must consider other HTA's, e.g. Franc Fief.

Response: Framework can only consider the present situation. The traffic and roads situation would need to be examined again if Franc Fief were to be considered for development, and decisions made at that time.

Para 7.42 – Would like EIA screening to be part of the Development Framework.

Response: The EIA screening (to determine if an EIA is required) is more appropriate at the application stage when more precise details of the proposed development are available. See para 7.42

Para 9.4 – Existing roads unsuitable for construction vehicles.

Response: A Construction Environmental Management Plan (CEMP) is required for the development and must address this issue. See section 9 of the Development Framework.

Generally – Robergerie Road should be referred to as Robergerie, Road is incorrect.

Response: It is referred to as Robergerie Road in Perry's and as Robergerie in Digi-map.

Generally – Disappointed that such an important document was published without scrutiny

Response: Many of the errors relate to numbering of photos and diagrams which were repositioned within the document when the text was restructured to form a more logical sequence. These should have been picked up, but some were missed. They have now been corrected.