

## **REPORT OF THE CONSULTATION RESPONSES TO THE SALTPANS REVISED DRAFT DEVELOPMENT FRAMEWORK**

### **Introduction**

A revised Draft Development Framework was prepared by the Planning Service for a potential residential development at Saltpans, Saltpans Road in the parishes of St Sampson and Vale.

A previous Draft Development Framework was subject of a public consultation stage in April and May 2019. Comments expressed during the previous consultation period resulted in a further period of review and consultation, including during the Committee Meeting of 22 August 2019.

As a consequence of this, the site boundary was extended to include the Important Open Land to the west. The purpose of including the Important Open Land within the site boundary was to encourage the restoration and enhancement of this parcel of land for public access, in conjunction with the residential development of the remainder of the site. However, the Important Open Land itself cannot be developed for residential purposes.

In addition, the Traffic Impact Assessment was reviewed to include a more thorough assessment of the cumulative impact of committed developments in the area. An addendum to the Traffic Impact Assessment, dated 24/01/2020, was published alongside the revised Draft Development Framework.

The revised Draft Development Framework also incorporated alterations resulting from feedback to the earlier public consultation stage and the subsequent review of issues raised.

The Draft Development Framework was prepared to provide planning guidance on how the site might be developed. Part of the Saltpans site is designated as a Housing Allocation site in the Island Development Plan and comprises of a former horticultural site which has since been largely cleared. The part of the site designated as a Housing Allocation covers an area of approximately 2.8 hectares (17 verges). A Development Framework was required for this site in accordance with Policy MC2 (Housing in Main Centres and Main Centre Outer Areas) as part of the site is a Housing Allocation and the area exceeds 0.25 hectares (1.5 verges).

The purpose of the Development Framework is to provide broad, comprehensive and practical guidance on how policies in the Island Development Plan will be applied to the site and to consider the appraisal of the wider area and site.

In terms of density and housing numbers, the exact number of units achievable will depend on the detailed design response to the site analysis and guidelines contained in the Development Framework. However, in order to ensure land is used efficiently it is anticipated that the site would be able to accommodate a density range of 30-55 dwellings per hectare, which is approximately 84-154 dwellings on this site. This density

range reflects the proximity of the site to The Bridge and the potential good standard of vehicular access onto La Route Du Bray.

The revised Draft Development Framework was subject of a four week public consultation which closed on the 27 March 2020. The public were invited to make comment via a press release and media coverage in the Guernsey Press. The document was placed on the States' website in addition to being available in Sir Charles Frossard House. During this period, 2 comments were received from the public and there was consultation with several States' Committees/Agencies and the Constables of St Sampson and the Vale parishes, although the Constables did not make any further comments.

The comments expressed during the consultation period on the revised Draft Development Framework principally relate to:

- Housing density and the variation in the potential density;
- Traffic generation and the impact of the development on the surrounding road network;
- Infrastructure Improvements;
- Waste management and the potential for contaminated land;
- The need for an Environmental Impact Assessment; and
- A Green Industry Business Strategy for Saltpans.

The consultation responses are set out below together with Officer responses (italicised) and recommended amendments (shaded boxes) where appropriate:-

### **States' Committees**

#### **The Office of Environmental Health and Pollution Regulation**

I have reviewed the draft Development Framework produced in relation to the above site. I can confirm that should an application be made for this site this office would be likely to recommend several conditions.

Having reviewed the historic records available there is evidence demonstrating that there were a number of former heated greenhouses on the site. As such a condition relating to potentially contaminated land would be recommended. In addition a Construction Environmental Management Plan and Waste Management Plan would also be recommended to be attached as conditions to the consent.

#### **Officer Response**

*The potential for contaminated land and the need for a Site Waste Management Plan and A Construction Environmental Management Plan are included in section 8 of the Development Framework.*

#### **Housing**

Housing has no comments on the revised Saltpans Draft Development Framework.

### **Officer Response**

*Noted.*

### **Public Agencies**

#### **Guernsey Electricity**

We write in support of the following Framework developments below.

#### **Salt pans Development & Leale's Yard**

There are numerous indicators for significant infrastructure improvements within the area.

In this regard, Guernsey Electricity will need provision for the permanent installation of distribution pillars and Secondary substations.

Provision for the laying of Low Voltage and High Voltage cables will also be required. Please note there currently is HV cabling in the Salt pans site, so careful consideration of this will be required.

A Primary substation may be required within either of these sites.

Whilst these developments are close to the power station, we have no concern that provision of supply can be provided, however this will be subject to:

1. Suitable location and provision provided, taking into account of water table, etc.
2. Planning and other statutory approvals.
3. Provision of new cables taking additional consideration of road closures and embargos.
4. Suitable notice to plan such work. We would recommend 3 years as a guide.
5. Agreed contract with the client.

Guernsey Electricity are prioritising supply via the 100% renewable resourced cable feed to Europe. To address additional supply, GEL use diesel generation for top-up purposes and seldom use legacy generation plant for backup and maintenance purposes.

In this regard, whilst monitoring and complying with regulatory requirements; emission, noise and vibration should not have any unacceptable effect on these developments.

### **Officer Response**

*It is agreed to amend the Development Framework to include comments made by Guernsey Electricity regarding the potential scope of works required to upgrade the electricity network.*

**Recommendation:**

That paragraph 7.44 of the 'Development Guidelines' section is amended as follows:-

'Improvements to the electricity network will be required such as the provision for the permanent installation of distribution pillars and Secondary substations and a Primary substation may be required. Provision for the laying of Low Voltage and High Voltage cables will also be required. It is noted that there currently is High Voltage cabling in the Saltpans site and careful consideration of this will be required. Due to the improvements that would be required to the electricity network, Guernsey Electricity recommend that significant upfront early consultation is undertaken by prospective developers at least 12-18 months prior to any work on the site.'

**Guernsey Waste**

The following comments are provided on behalf of Guernsey Waste, and largely relate to the inclusion of the Important Open Land to the west of the site in the Development Framework.

1. With regards to Landscape Design and Biodiversity (section 7.38 - 7.43), the site is known to contain numerous large stands of pampas grass, an invasive species. This will need to be cleared as part of the development of the site, particularly in the Important Open Land area. Pampas grass cannot be accepted for composting at Mont Cuet Landfill Site, and the developer should include proposals for managing the control and disposal of the pampas grass on site.
2. Nearby sites to the east (Leale's Yard) and to the west (Key Industrial Area) are both known to contain stands of Japanese Knotweed. A site investigation is required to identify if Japanese Knotweed is also present at this site (it is not mentioned in the Development Framework). As with pampas grass, with no appropriate disposal route for Japanese Knotweed, if present, it will require dealing with on site, and should form part of the development plan for the Important Open Land area.
3. Section 8.4 could be strengthened with the statement "Stone, concrete, bricks, and other inert materials arising from removal of existing hardstanding surfaces, below ground infrastructure, and building demolition will be processed on site to meet appropriate standards for recycled aggregates for use as structural fill material required for the development."
4. Due to the limited amount of demolition required prior to development, it is anticipated that a significant quantity of engineering materials will need to be brought on to the site. Consideration should be given to utilising recycled aggregates where possible, assuming they meet appropriate standards. This should be included in the Site Waste Management Plan.

### **Officer Response**

*Reference to the minimisation of waste through the use of appropriate routes for recycling, recovery or disposal is included in section 8 of the Development Framework. Further detail would be required as part of the Site Waste Management Plan. With regards to the use of recycled aggregates, paragraph 7.18 of the Development Framework requires proposals to demonstrate sustainable design and construction techniques including the use of materials.*

*It is agreed to amend the Development Framework to include the comments made by Guernsey Waste regarding pampas grass and Japanese Knotweed.*

#### **Recommendation:**

That paragraph 7.38 of the 'Development Guidelines' section is amended as follows:-

'A comprehensive landscaping scheme must be submitted as part of any proposal which should respect the local character, mitigate against the impact of development and consider opportunities to increase and improve biodiversity on the site. This should include the clearance of all of the existing pampas grass from the site. The existing water features provide an opportunity to create focus points and to improve ecology/biodiversity'.

That paragraph 8.1 of the 'Waste and Environment' section is amended as follows:-

'The former commercial horticultural use of the site could give rise to potentially contaminated land, particularly due to numerous heated glasshouses, fuel tanks and concerns over the reservoir. In addition, nearby sites to the east and west are known to contain stands of Japanese Knotweed. These aspects will need to be investigated and appropriate remedial action taken where necessary'.

And that paragraph 8.4 of the 'Waste and Environment' section is amended as follows:-

'All materials from the demolition of the existing buildings and clearance of the site will need to be carefully sorted, separated, and distributed accordingly through the appropriate routes for recycling, recovery or disposal, in order to minimise the waste produced. Pampas grass cannot be accepted for composting at Mont Cuet Landfill Site. A Site Waste Management Plan should include details to manage the control and disposal of the pampas grass on site'.

### **La Société Guernesaise**

We refer to our email of 8 May 2019 and acknowledge that most of our previous comments have been incorporated either wholly or in part. On a minor note, we would

point out that we think there may be an error in the recommended planting list with non-native Evergreen Oak being included instead of native English Oak.

We would highlight our primary concern over the need for an Environmental Impact Assessment.

The site measures 4.6ha and the developable land is 2.8ha. It is similar in size to Leale's Yard which measures 5ha. This exceeds the threshold of 1ha as outline under Schedule 2 of the Environmental Impact Assessment Ordinance 2007:

An Environmental Impact Assessment may be required, subject to screening by the Department to ascertain whether a significant environmental effect is likely to occur, where (excerpt):

- *Where development falls within Schedule 2 of the Environmental Impact Assessment Ordinance.*

Summary of Schedule 2 (excerpt):

- *Any development project (not in Schedule 1) exceeding an area of 1 hectare (including business parks, industrial estates, retail or leisure).*

The Saltpans land is almost entirely undeveloped and comprised of natural and semi-natural habitats, reflecting its recent history as derelict – and relatively undisturbed – land. The site is roughly twice the size of the nearby Grosses Hougues Area of Biodiversity Importance and about three times larger than the adjoining Braye Road Area of Biodiversity Importance. Further, the juxtaposition of the site to these two Areas of Biodiversity Importance designations elevates the need for an Environmental Impact Assessment to fully consider the environmental impacts of any proposed development both on the site itself and on the ecological functionality of the neighbouring Areas of Biodiversity Importance. An Environmental Impact Assessment would identify and quantify the existing habitats and the associated biodiversity. It would consequently determine the need for any mitigation measures and environmental offsetting.

We would therefore like to repeat our request for an Environmental Impact Assessment prior to any development on the Saltpans site.

**Officer Response**

*As set out in section 8 of the Development Framework, due to the size of this site (it exceeds 1 hectare) a screening opinion will be required as to whether or not an Environmental Impact Assessment is required.*

*It is agreed to correct the list of plant species and to replace Evergreen Oak with English Oak.*

### **Recommendation:**

That paragraph 7.40 of the 'Development Guidelines' section is amended as follows:-

'Tree and shrub planting should be substantial and following best practice be formed of native species. The following species may be appropriate for areas of planting which would contribute to the landscape character of the area: Alder, Ash, Blackthorn, Birch (Downy), English Oak, Gorse, Hawthorn, Lime, Poplar (Black and Aspen) and Sallow.'

### **Public Comments**

The consultation period resulted in 2 comments from the public. The main issues raised by the public are summarised as follows:

### **Officer Response**

#### ***Housing density and the variation in the potential density***

*A respondent raised concerns about the large range in the potential housing density for the site. The Development Framework gives an indicative density range of 30-55 dwellings per hectare, which equates to approximately 84-154 dwellings on this site. For the purposes of comparison, approved Development Frameworks for other nearby sites had the following density ranges:*

- *Cleveleys Vinery, La Route Du Braye - 25-35 dwellings per hectare.*
- *Camp Dolent, Tertre Lane – 30-45 dwellings per hectare.*
- *Le Maresquet, La Hure Mare Road – 30-55 dwelling per hectare.*
- *Pointues Rocques Housing Allocation – 30-55 dwellings per hectare.*

*The density of development should take into account the scale that is appropriate to the surrounding area and to the specific site and development is required to meet the requirements of planning policies as set out in the Island Development Plan, which includes both demonstrating the most effective and efficient use of land, but also requires that development respects the character of the local built environment (Policy GP8: Design). The Development Framework considers the character of the area in some detail (sections 4, 5 and 6) which adequately establishes the context for development of this site.*

*Whilst the density range is relatively large, this is reflective of the potential variations in the exact mix and type of housing which will be determined at the point of any planning application on the site, with this informed by the most up to date information available such as Housing Needs Surveys and other relevant information held by the States of Guernsey, and reflective of the demographic profile of households requiring housing. The density range also reflects the need for further assessments to be undertaken including a baseline ecological/ biodiversity study, details of the Surface Water Management Plan and measures to be incorporated to manage the potential flood risk, all of which could affect the area of developable land and the design of the development.*

*The site is situated in close proximity to The Bridge, it has the potential to be served by a good standard of vehicular access onto La Route Du Braye and is situated in an area where development sites are expected to achieve a higher density of development. Consequently,*

*it is considered that the proposed density range is reflective of the character of its surroundings, the opportunity the site presents due to its proximity to The Bridge and the further assessments that would be required to inform the development of the site.*

*However, the exact number of units could be higher or lower and will depend on the detailed design response to the specifics of the site, which will be assessed on merit based on the relevant policies of the Island Development Plan as part of the consideration of a detailed planning application.*

***Traffic generation and the impact of the development on the surrounding road network***

*A respondent raised concerns about the amount of traffic generated by the development, the impact on the surrounding road network and questions the adequacy of the scope of the Traffic Impact Assessment, highlighting other main roads and a number of minor roads which were not assessed as part of the Traffic Impact Assessment.*

*A balance is required to ensure that the scope of the Traffic Impact Assessment is sufficient to establish a good understanding of the implications of the proposed development and other significant development in an area on the road network, whilst ensuring that the scale of any Traffic Impact Assessment is proportionate. A revised Traffic Impact Assessment was carried out which included a more thorough assessment of the cumulative impact of committed developments in the area. The scope of the Traffic Impact Assessment, including the roads and junctions to be assessed, was agreed with Traffic and Highway Services and is considered to be appropriate and proportionate to the scale and nature of the potential development of this site.*

*As set out in paragraph 6.11 of the Development Framework, the Traffic Impact Assessment concludes that the development is not anticipated to have a significant impact on the operation of the local road network although cycle times would need to be adjusted at the La Route du Braye/Route Militaire crossroads to mitigate the impact of the development. Traffic and Highway Services have raised no objections to the proposed density range and advise that the updated Traffic Impact Assessment demonstrates that the road network is able to safely accommodate the proposed development with mitigation measures in place.*

*However, paragraph 6.11 also acknowledges that the cumulative impact of committed developments in the area has the potential to cause specific junctions to operate over capacity and that mitigation measures are likely to be required or the potential density of the development could be affected. Having regard to paragraphs 7.9 and 7.31, the ability of the local road network to cope with the proposed development will be assessed further as part of the consideration of a detailed planning application and the capacity of the local road network in conjunction with other committed developments may affect the resultant number of dwellings on the site.*

***A Green Industry Business Strategy for Saltpans***

*A respondent has submitted a concept paper regarding energy production and green industries and recommends pausing the development of this site to enable alternative development options to be considered.*



*The area of the site that could potentially be developed for residential purposes is designated as a Housing Allocation Site. Island Development Plan policies state that this part of the site can only be developed for housing and, if appropriate, complementary development. As such there would be no scope to develop the eastern section of the site for alternative forms of development.*

## **Summary**

The consultation process in respect of the revised Draft Development Framework has elicited a limited number of responses. The Authority will need to carefully consider the representations, together with the Officer responses, before finalising a Development Framework for the Saltpans site. Once finalised, the Development Framework will provide a valuable supplementary policy context for determining any subsequent planning application(s) for the site.