



**PLANNING APPLICATION REPORT**

**Application No:** FULL/2019/1645  
**Property Ref:** B00750A000+B00750C000  
**Valid date:** 15/08/2019  
**Location:** Pointues Rocques Housing Allocation Site Rue Des Pointues  
Rocques St. Sampson Guernsey  
**Proposal:** Proposed residential development for the erection of 32  
dwellings, 10 flats, 10 maisonettes and 16 affordable houses, with  
associated vehicular accesses, car parking and landscaping  
**Applicant:** Mr R Plumley, Messrs Gabriels, Asparagus Tips Too Ltd & GHA

**RECOMMENDATION** – (a) To Grant Planning Permission with Conditions, subject to the entry by the Owners (and all persons with an interest in the land) into a binding planning covenant agreement in a form satisfactory to the Development & Planning Authority (the Authority) and;  
(b) to give delegated authority to the Director of Planning to enter into, execute and complete the planning covenant agreement on the terms set out in this report on behalf of the Authority.

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1. All development authorised by this permission must be carried out and must be completed in every detail in accordance with the written application, plans and drawings referred to above. No variations to such development amounting to development may be made without the permission of the Authority under the Law.

Reason - To ensure that it is clear that permission is only granted for the development to which the application relates.

2. The development hereby permitted shall be begun within 3 years from the date of grant of this permission.

Reason - This condition reflects section 18(1) of the Land Planning and Development (Guernsey) Law, 2005 which states that planning permission ceases to have effect unless development is commenced within 3 years of the date of grant (or such shorter period as may be specified in the permission).

3. The development hereby permitted and all the operations which constitute or are incidental to that development must be carried out in compliance with all such requirements of The Building (Guernsey) Regulations, 2012 as are applicable to them, and no operation to which such a requirement applies may be commenced or continued unless (i) plans relating to that operation have been approved by the Authority and (ii) it is commenced or, as the case may be, continued, in accordance with that requirement and any further requirements imposed by the Authority when approving those plans, for the purpose of securing that the building regulations are complied with.

Reason - Any planning permission granted under the Law is subject to this condition as stated in section 17(2) of the Land Planning and Development (Guernsey) Law, 2005.

4. No development, including demolition and site works, shall begin until there has been submitted to and agreed in writing by the Authority a desktop study identifying any potential contaminating features.

Reason - To make sure that the site, when developed is free from contamination, in the interests of public health and safety.

5. Unless the Authority has confirmed in writing that such a report is unnecessary, no development, including demolition and site works, but excluding works required to meet the requirements of this condition, shall begin until there has been submitted to and agreed in writing by the Authority a site investigation report documenting the ground conditions of the site and incorporating chemical and gas analysis identified as appropriate by the desktop study.

Reason - To make sure that the site, when developed is free from contamination, in the interests of public health and safety.

6. Unless the Authority has confirmed in writing that such a report is unnecessary, no development, including demolition and site works, shall begin until there has been submitted to and agreed in writing by the Authority a detailed scheme for remedial works and measures to be undertaken to avoid risk from contaminants and/or gases when the site is developed and proposals for future maintenance and monitoring. The development shall be carried out only in accordance with the agreed scheme.

Reason - To make sure that the site, when developed is free from contamination, in the interests of public health and safety.

7. Unless the Authority has confirmed in writing that verification is unnecessary, no part of the development shall be occupied until there has been submitted to and agreed in writing by the Authority a report providing verification that the remediation scheme agreed under Condition 6 above has been implemented fully in accordance with the agreed details. Unless otherwise agreed in writing by the Authority such verification shall comprise:

- i) as built drawings of the implemented scheme;
- ii) photographs of the remediation works in progress;
- iii) certificates demonstrating that imported and/or material left in situ is free from contamination.

Thereafter the scheme shall be monitored and maintained in accordance with the scheme approved under Condition 6.

Reason - To make sure that the site, when developed is free from contamination, in the interests of public health and safety.

8. Before the commencement of any works in connection with the development hereby permitted, and notwithstanding the submitted details, the applicant shall submit to and

have agreed in writing by the Authority a revised Construction Environmental Management Plan (CEMP) to also include the following:

- i) An explanation for any deviation from the requirements of BS 5228 parts 1 & 2;
- ii) Details of any piling works and specific measures that will be implemented whilst those works are taking place;
- iii) Hours of noisy works to be included in the letter drop to residents; and
- iv) The letter drop area to be increased to include properties on Rue Des Monts, Close Des Jardiniers, Waters Rocque, Ruelle St Clair and further properties on Robergerie.

The development shall be carried out strictly in accordance with the agreed CEMP, which shall be made available to any interested party on request.

Reason - To ensure that the construction process is managed in such a way as to minimise adverse impacts on the amenity of the local area as far as possible.

9. No development, including site clearance and demolition, shall take place until an updated version of the Site Waste Management Plan submitted as part of this application has been submitted to and approved in writing by the Authority. The updated Site Waste Management Plan shall take into account any further site surveys or changes to the construction programme, and shall identify an individual with responsibility for regularly monitoring the Site Waste Management Plan. The development shall thereafter be carried out only in accordance with the Site Waste Management Plan so approved.

Reason: To ensure that the development is managed to minimise waste during the demolition of any existing buildings or structures or during construction, that existing materials are reused, recycled or disposed of either on or off site, and that residual waste will be dealt with appropriately, in accordance with the aims and objectives of Policy GP9.

10. No part of the development hereby permitted shall be occupied or brought into use until there has been submitted to the Authority a report providing verification that the development has been carried out and monitored fully in accordance with the Site Waste Management Plan approved under Condition 9 above. Where there has been any variation from the approved Site Waste Management Plan, the report shall highlight and detail the reasons for this.

Reason: To ensure that the development is managed to minimise waste during the demolition of any existing buildings or structures or during construction, that existing materials are reused, recycled or disposed of either on or off site, and that residual waste will be dealt with appropriately, in accordance with the aims and objectives of Policy GP9.

11. No development, excluding demolition and site clearance works, shall take place until a construction specification for the swales within the site has been submitted to and agreed in writing by the Authority. The development shall thereafter be completed in accordance with the details so agreed.

Reason - To ensure that the swales function as intended as part of the SUDs strategy for the site as a whole, in the interests of sustainable development.

12. Notwithstanding the submitted details, no development, excluding demolition and site clearance works, shall take place until a construction specification for and plan showing the extent of all areas of permeable hard surfacing within the site has been submitted to and agreed in writing by the Authority. The development shall thereafter be completed in accordance with the details so agreed.

Reason - To ensure that the proposed SUDs approach functions as intended, in the interests of sustainable development.

13. No development, excluding demolition, clearance and site works shall take place until a detailed scheme of lighting for all roads, footpaths and parking areas, which shall be designed to minimise light pollution, has been submitted to and agreed in writing by the Authority. The development shall thereafter be completed in accordance with the agreed details, and the agreed lighting shall be made operational before the first occupation of any dwelling on the site.

Reason - In the interests of the natural environment and the amenity of future residents and neighbouring properties.

14. The landscaping scheme shall be fully completed, in accordance with the details submitted as part of this application and hereby approved, in the first planting season following the first occupation of any part of the development or completion of development whichever is the sooner, or in accordance with a programme previously agreed in writing by the Authority. Any trees or plants removed, dying, being severely damaged or becoming seriously diseased, within 5 years of planting shall be replaced in the following planting season by trees or plants of a size and species similar to those originally required to be planted.

Reason - To make sure that the appearance of the completed development is satisfactory and to help assimilate the development into its surroundings.

15. Notwithstanding the submitted details, and having regard to Condition 14 above, no dwelling shall be occupied until a landscape management plan, including long term design objectives, management responsibilities and maintenance schedules for all hard and soft landscape areas (including lighting), other than domestic gardens, and which shall include measures to ensure that areas of permeable hard surfacing continue to function as intended, has been submitted to and agreed in writing by the Authority. The agreed landscape management plan shall thereafter be fully implemented.

Reason - To ensure that communal hard and soft landscaped areas are properly maintained in the interests of the character and appearance of the development, the amenity of future occupants, and sustainable development.

16. No materials to be used on the exterior of the buildings shall be placed on the site until such time as a written specification and samples of those materials have been submitted to the Authority. Only materials agreed in writing by the Authority shall be used in carrying out the development.

Reason - To secure the satisfactory appearance of the completed development.

17. Details of bat and bird boxes to be installed as part of the development hereby permitted shall be submitted to and agreed in writing by the Authority, and shall thereafter be installed before the first occupation of any dwelling on the site.

Reason - In the interests of biodiversity within the site and surrounding area.

18. Solar panels, electric bicycle charging points, and ducting for electric vehicle charging point cabling proposed as part of the application hereby approved shall be installed and made operational before the first occupation of any dwelling on the site.

Reason - In the interests of sustainable development.

19. There shall be no occupation of any dwelling on the site until the vehicular accesses onto both Pointues Rocques and Robergerie and the 6no. on-street public parking spaces on Pointues Rocques have been completed in accordance with the approved plans.

Reason - In the interests of highway safety and traffic management.

20. Details of the proposed use and hard or soft landscaping treatment of that part of the application site immediately to the rear of the St Clair Flats parking area, which shall include details of the design of the adjacent electricity substation, shall be submitted to and agreed in writing by the Authority, and shall thereafter be completed before the first occupation of any dwelling on the site.

Reason - To ensure that the appearance of the completed development is satisfactory, in the interests of future occupant and neighbouring residential amenity, no formal agreement having been reached as to the use of this area to provide additional parking for the occupants of the St Clair Flats.

21. Notwithstanding the submitted details, precise details of the design, materials of construction and finish of the decorative gates to be installed to Courts A and B shall be submitted to and agreed in writing by the Authority, and those gates shall be installed before the first occupation of any part of the development hereby permitted.

Reason - Precise details of this aspect of the development have not been provided, and this information is required to ensure that the gates are of an appropriately high quality to meet the requirement for public art incorporated as an integral part of the development.

22. Noise associated with plant and machinery incorporated within the development shall be controlled such that the Rating Level, measured or calculated at 1-metre from the façade of the nearest existing noise sensitive premises, shall not exceed a level 5 dB(A) below the existing LA90 background noise level, including low frequency tones. Rating Level and existing background noise levels shall be determined as per the guidance provided in BS 4142:2014.

Reason - A limit on noise is needed to prevent a nuisance or annoyance to future occupants or nearby residents.

## INFORMATIVES

I. The phased risk assessment should be carried out also in accordance with the procedural guidance and UK policy.

The site is known to be or suspected to be contaminated. Please be aware that the responsibility for the safe development and secure occupancy of the site rests with the developer.

It is strongly recommended that in submitting details in accordance with the above conditions that the applicant has reference to CLR 11, Model Procedures for the management of land contamination. This is available online as a pdf document from [http://www.claire.co.uk/index.php?option=com\\_content&view=article&id=187&catid=45&Itemid=256](http://www.claire.co.uk/index.php?option=com_content&view=article&id=187&catid=45&Itemid=256) with further information available at <https://www.gov.uk/guidance/land-contamination-risk-management>.

II. Your attention is drawn to the Animal Welfare (Guernsey) Ordinance, 2012 and 2020 Strategy for Nature, and the need to comply with their provisions. The site may be used by nesting birds or other wildlife. You are requested to undertake site clearance outside of the main bird breeding season (March-July inclusive). Further, it is recommended that you contact La Societe Guernesiaise so that the site can be inspected prior to clearance to ensure that any protected species present, such as bats, are not impacted by the works. La Société can be contacted on 07781 166924 or email [societe@cwgsy.net](mailto:societe@cwgsy.net).

III. This permission has been granted following the conclusion of a planning covenant under Section 23 of the Land Planning and Development (Guernsey) Law, 2005.

IV. For the purposes of Condition 13, any lighting scheme should include:

1. an indication of the proposed frequency of use of the lights and the hours of illumination;
2. two copies of an accurate plan showing the areas to be lit;
3. details of the number, location, height and design of any lighting columns or other fixtures;
4. the type, number, mounting height and alignment of the luminaires and the beam angles and upward waste light ratio for each;
5. a diagram showing the predicted levels of illumination at the site boundaries; and
6. a diagram showing the predicted vertical illumination affecting any adjacent dwellings.

V. With reference to Conditions 9 and 10, the way in which waste is dealt with on the site (reused, recycled or disposed of) should be recorded during the clearing of the site and the construction process. This information will be required in order to inform the final Site Waste Management Plan document that is required by Condition 10 to be submitted to the Authority upon completion of the development. For further information on the Site Waste Management Process please refer to Advice Note for Site Waste Management Plans found under the Site Waste Management Plan link at [https://gov.gg/planning\\_building\\_permissions](https://gov.gg/planning_building_permissions).

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## **OFFICER'S REPORT**

### **Site Description:**

The Pointues Rocques Housing Allocation site extends to approximately 2.5 hectares, or 15 vergées. The site currently houses the St Clair Nursery (accessed off Rue des Pointues Rocques), a dwelling called The Swallows (on Robergerie Road), plus St Clair House, which contains 6no. flats, and associated parking area. The site is allocated in the Island Development Plan (IDP) for housing development. This is a single site (albeit with multiple owners) and one of 15 allocated in the IDP for housing development.

The site is within a generally low lying area of the Island defined by hougues, or small rocky hills. The site itself is on the western side of one of these hills, with views over the north of the Island. It is within an area of built up character which adjoins the more dense urban area of The Bridge. There are fields and trees to the north and east with more rural areas to the west and south west. The site itself can be viewed at a distance from several vantage points, including from Vale Castle, Beau Sejour and L'Ancrese Common.

The site is located within the Bridge Main Centre Outer Area and almost entirely within the Delancey Conservation Area. There are a small number of protected buildings to the north-west and east of the site.

### **Relevant History:**

FULL/2017/1956 - Proposed residential development for the erection of 50 flats, 20 new dwellings and 13 affordable houses, with associated car parking and landscaping and junction alterations on St Clair Hill/Robergerie Road (Phase 1)  
Superseded following submission of revised scheme on 01-08-2019

### **Existing Use(s):**

Residential Use Class 1  
Residential Use Class 2  
Agricultural Use Class 28

### **Brief Description of Development:**

This application proposes a first phase of residential development within the Housing Allocation site, comprising an area of some 1.72 hectares or 10.5 vergées. The remainder of the site is anticipated to come forwards as a second phase in due course.

Following deferral and submission of amended plans, it is now proposed to construct a total of 68no. dwellings, comprising 48no. houses, 10no. maisonettes and 10no. flats, broken down as follows:

- 11no. 1-bed houses
- 19no. 2-bed houses
- 18no. 3-bed houses
- 7no. 2-bed maisonettes

3no. 3-bed maisonettes  
7no. 1-bed flats  
2no. 2-bed flats  
1no. 3-bed flats

16no. of the 1 and 2-bed houses are to be affordable.

The scale of the proposed buildings within the site varies between 1 ½, 2 and 2 ½ storeys, all of pitched roof design with both traditional and more contemporary elevational treatments.

Vehicular access is to be provided from both Pointues Rocques and Robergerie, which will involve the demolition of the majority of a c.80m long roadside granite wall adjoining Pointues Rocques as well as the demolition of a 4-bedroom dwelling ('The Swallows') on Robergerie. 6no. displaced on-street parking spaces will be relocated within the site along Pointues Rocques.

### **Environmental Impact Assessment**

A Screening Opinion was prepared in April 2019, as the site exceeds 1 Ha in area and thus falls under Schedule 2 of the Land Planning and Development (Environmental Impact Assessment) Ordinance, 2007, and it was concluded that EIA is not required.

### **Relevant Policies of any Plan, Subject Plan or Local Planning Brief:**

#### **Island Development Plan**

MC2 – Housing in Main Centres and Main Centre Outer Areas  
GP1 – Landscape Character and Open Land  
GP4 – Conservation Areas  
GP5 – Protected Buildings  
GP8 – Design  
GP9 – Sustainable Development  
GP10 – Comprehensive Development  
GP11 – Affordable Housing  
GP17 – Public Safety and Hazardous Development  
GP18 – Public Realm and Public Art  
IP6 – Transport Infrastructure and Support Facilities  
IP7 – Private and Communal Car Parking  
IP9 – Highway Safety, Accessibility and Capacity

#### **Supplementary Planning Guidance**

Strategy for Nature, 2020  
Pointues Rocques Development Framework, March 2019  
Parking Standards and Traffic Impact Assessment, 2016  
Affordable Housing, 2016

## **Representations:**

118 letters and emails of objection, in relation to both the 2019 submission and more recent revised plans/additional information, concerns raised summarised as follows:

- Proposed development would result in further overdevelopment of the north of the Island;
- Cumulative impacts when taken with other allocated and windfall residential development site;
- Brownfield sites should be developed in preference to sites such as this;
- Infrastructure, services and facilities do not have the capacity to cope with additional demand;
- Local highway network does not have the capacity for additional vehicle movements that would result from this development;
- Existing on-street parking is already in short supply, and this development would exacerbate that;
- Increased traffic would result in greater risk for cyclists and pedestrians;
- The site has been designated as part of a conservation area, the special interest of which has not been properly taken into account;
- The setting of nearby protected buildings would be harmed;
- The design and materials of proposed buildings would not enhance the character of the area;
- The existing site has an ecological value which needs to be properly evaluated;
- Development will give rise to overlooking, overbearing and overshadowing impacts on neighbouring residential properties;
- Surface water run off could cause flooding outside of the site;
- Proposed housing will not address the housing crisis in terms of the affordability and design of the private houses;
- Construction works will take a long time and will affect local residents, and may damage boundary walls and established trees;
- Details of the Phase 2 development have not been provided, so this application cannot be seen to be comprehensive.

La Societe Guernesiaise has also commented as follows:

In respect of this application, we would like to highlight that this site has supported some semi-natural habitats for many years. As such it will host a range of wildlife. This aspect was referred to in the Development Framework although we feel that it wasn't given its due regard. However, under the local Strategy for Nature, we welcome the greater importance which is now placed on the environmental impact of development and particularly the requirements placed on developers to ensure that net ecological gains are sought for all projects.

We note that the Development Framework requires a Construction Environmental Management Plan -

9.1. A Construction Environmental Management Plan (CEMP) is required to be submitted with a planning application. It should consider environmental issues such as: • Contamination; • Archaeology; • Ground Water; • Ecology.

We would fully support this requirement and would request that if such a plan has been submitted, that it is independently assessed to determine its accuracy and suitability.

We believe that the plan should firstly evaluate the current biodiversity value of the site. The findings of a ground survey would identify any important habitats and associated wildlife such as nesting birds, or features such as chimneys or outbuildings which could host bats. This information would then be used to draw up mitigation measures to reduce the ecological impacts associated with clearing and developing the site. It would also be key to achieving a net ecological balance for the project – a priority under the Strategy for Nature.

If the application is subsequently approved, we would also request that site clearance be undertaken outside of the main bird breeding season (March-July inclusive) and that any outbuildings are inspected for use by bats. This would reduce the risk of disturbing or destroying animals which are protected under the Animal Welfare Ordinance 2012.

We would request that an informative note be added to the Information Sheet as follows -

‘Your attention is drawn to the Animal Welfare (Guernsey) Ordinance, 2012 and 2020 Strategy for Nature, and the need to comply with their provisions. The site may be used by nesting birds or other wildlife. You are requested to undertake site clearance outside of the main bird breeding season (March-July inclusive). Further, it is recommended that you contact La Societe Guernesiale so that the site can be inspected prior to clearance to ensure that any protected species present, such as bats, are not impacted by the works. La Société can be contacted on 07781 166924 or email [jamie.hooper@cwgsy.net](mailto:jamie.hooper@cwgsy.net)

### **Consultations:**

Consultations have been undertaken with the following services and bodies:

Traffic & Highway Services (THS)  
The Office of Environmental Health and Pollution Regulation (OEHPR)  
The Constables of St Sampson  
Housing Service

Copies of all responses are set out in Appendix A to this report.

### **Summary of Issues:**

- Principle of development
- Mix and type of Housing
- Highway safety, accessibility and capacity
- Design and amenity
- Ecology and landscaping
- Planning covenant

### Assessment against:

- 1 - Purposes of the law.
- 2 - Relevant policies of any Plan, Subject Plan or Local Planning Brief.
- 3 - General material considerations set out in the General Provisions Ordinance.
- 4 - Additional considerations (for protected trees, monuments, buildings and/or SSS's).

The purposes of the Land Planning and Development (Guernsey) Law, 2005, are to protect and enhance, and to facilitate the sustainable development of, the physical environment of Guernsey.

Section 34 of the Law explains the general functions of authorities in respect of protected buildings. This states that:

*It is the duty of any department of the States when exercising its functions under this Law –*

*(a) to secure so far as possible that the special historic, architectural, traditional or other special characteristics of buildings listed on the protected buildings list (“protected buildings”) are preserved, and*

*(b) in particular, in exercising its functions with respect to a protected building or any other building or land in the vicinity of a protected building, to pay special attention to the desirability of preserving the protected building’s special characteristics **and setting** [emphasis added].*

Section 38(1) sets out that:

*In the exercise, with respect to any buildings or other land in a conservation area, of any powers under this Law or any other enactment, special attention shall be paid to the desirability of preserving or enhancing the character and appearance of that area.*

In respect of these statutory duties, the word ‘preserve’ is taken in its ordinary meaning as set out in Chambers dictionary, which is ‘to keep safe from harm or loss’.

The purposes of the Law are reflected in the Island Development Plan, the principal aim of which is to help maintain and create a socially inclusive, healthy and economically strong Island, while balancing these objectives with the protection and enhancement of Guernsey’s built and natural environment and the need to use land wisely. In practice, particularly when dealing with a development of this scale and that raises such a wide range of issues, it is not always possible for an applicant to achieve compliance with each and every requirement of the IDP. In such cases the Authority must balance positive and negative factors in the context of the IDP as a whole, as conflict with planning policy in one or more areas does not automatically mean that permission could reasonably be refused. Relevant policies will be addressed below in assessing the key issues.

Section 13 to Part IV of The Land Planning and Development (General Provisions) Ordinance, 2007, sets out a number of general material considerations, the following of which are considered to be relevant in this instance:

- (b) the character and quality of the natural and built environment which is likely to be created by the development,*
- (c) the appropriateness of the development in relation to its surroundings in terms of its design, layout, scale, siting and the materials to be used,*
- (d) the likely effect of the development on the character and amenity of the locality in question,*
- (e) the likely effect of the development on roads and other infrastructure, traffic and essential services,*
- (i) the likely effect of the development on the reasonable enjoyment of neighbouring properties.*

#### Principle of development

At the outset it is important to highlight that this site was previously allocated for residential development under the 2002 Urban Area Plan, and consequently that it has been anticipated and expected to be brought forwards for residential development for the last 20 years.

This is one of several sites allocated for residential development under the IDP, the Spatial Policy to which, expressed through Policy S1, is to, *“concentrate the majority of new development in the Main Centres and the Main Centre Outer Areas to maintain the vitality of these areas”*.

Allocation of this site under the IDP, and the more recent approval of a Development Framework as site specific Supplementary Planning Guidance, means that the principle of residential development is wholly acceptable and cannot be questioned, Policy MC2 stating that such sites *“...can only be developed for housing and, where appropriate, complementary development..”*.

In addition, the detailed design and layout of this first phase of development would not preclude subsequent development of the remainder of the housing allocation, and as such complies with the objectives of Policy GP10 and the requirements of paragraphs 7.2 – 7.3 of the Development Framework.

This being the case, assessment of this proposal is focused primarily on matters of detail in terms of statutory duties under the Law, IDP policies and Supplementary Planning Guidance identified above.

#### Mix and type of housing

Policy MC2 states that, in all cases, proposals for housing development in the Main Centres and Main Centre Outer Areas will be supported where they are in accordance with all other relevant policies, and that where able to they accommodate an appropriate mix and type of dwellings.

As this application proposes more than 20 dwellings, policies MC2 and GP11 also impose a requirement to provide a proportion of the development as affordable housing. Policy GP11 sets out that the proportion of affordable housing required to be provided varies between sites involving more than 20, 25 or 30 dwellings, in the latter case the requirement being for 30% of the developable part of the site to be provided for

affordable housing. That requirement has been met in this case, and would deliver 16 affordable 1 and 2-bed houses.

The latest available information (June 2021) sets out that the current housing requirement is as follows:

1 bed – 17-19%  
2-bed – 38-39%  
3-bed – 42-45%  
4-bed – 0%  
5+ -bed – 0%

The proposed mix and type comprises 1, 2 and 3-bed houses, maisonettes and flats that, although of a higher density, would not be out of keeping with the character of the surrounding area and would make an effective and efficient use of land in accordance with Policy GP10. The inclusion of a higher proportion of 1-bed dwellings within the affordable housing element means that the proposed mix and type does not precisely accord with the June 2021 figures set out above, being 26.5%, 41.2% and 32.4% for 1, 2 and 3-bed dwellings respectively. However, as the provision of a higher proportion of 1-bed dwellings follows discussions with both the Housing Service and Guernsey Housing Association, reflecting a particular need for 1-bed dwellings in the affordable sector, the proposed mix and type is considered to meet the current identified need and to be acceptable in accordance with the requirements of Policy MC2.

#### Highway safety, accessibility and capacity

The application is supported by a Traffic Impact Assessment (TIA), which itself follows on from earlier TIA's prepared in connection with the original planning application, Development Framework, and the site's allocation in the IDP, and which has been assessed in detail by THS. The following assessment draws on the conclusions set out in THS' most recent consultation response dated 15 September 2021 (repeated in full at Appendix A).

Policy IP9 requires the Authority to take into account the existing public road network's ability to cope with any increased demand as a result of a given development proposal, and of any physical works to the highway or implementation of an operational scheme to manage the impact of the development on the road network, as well as the access requirements of people of all levels of mobility and health. Paragraph 20.10.1. in the preceding text to Policy IP9 frames this in the context of the Strategic Land Use Plan, noting that:

*the creation of compact, walkable communities centred on a high quality public transport system can make it possible to live a higher quality life without complete dependence on a motor car. The Strategic Land Use Plan also states that the historic form of the public road network constrains the scope of potential highway improvements with buildings and other structures often positioned on the back edge of the pavement. This form of development is particularly prevalent in the central parts of the Main Centres.*

The proposed development would provide 133 car parking spaces (comprising 18 accessible and 91 standard resident spaces, 12 standard visitor spaces, 6 on-street spaces on Pointues Rocques (to be transferred to the States under provisions of a planning covenant), and 6 spaces intended to serve the adjacent St Clair flats), 31 motorcycle spaces, and 137 bicycle spaces (for both residents and visitors, and including dedicated, secure electric charging facilities). This level of vehicle and bicycle parking is compliant with IDP parking standards, which are set out in the Parking Standards and Traffic Impact Assessment Supplementary Planning Guidance.

The proposed access design (onto both Robergerie and Pointues Rocques) would meet the minimum recommended design standards within the Traffic Engineering Guidelines for Guernsey, and includes measures to direct most vehicular traffic to the east towards St Clair Hill and Route Militaire. The design would also allow for public parking to be relocated within Pointues Rocques to enable unhindered 2-way flow between the site and St Clair Hill (the closest major road), whilst also creating what would be a convenient pedestrian/cycle link through the site from the north-west to south-east.

Whilst some concerns exist about potential increased risks to vulnerable road users arising from increased traffic movements associated with the proposed development, it does not appear practical to achieve segregated facilities along Robergerie and Pointues Rocques. In light of this and the fact that a pedestrian/cycle link would be created as part of this development, and given that there is no road traffic collision data to suggest that these roads are unsafe for vulnerable road users, it is considered that the increased traffic movements would be only result in a slight increase in risk to vulnerable road users. This slight increase in risk is not considered to represent grounds to refuse planning permission in the context of Policy IP9.

The most significant road safety concern relates to the sub-standard oncoming 15m sightline of a driver egressing Pointues Rocques onto St Clair Hill, which is approximately half of the recommended minimum standard and where attempts by both THS and the applicant to address this issue have thus far failed. This deficiency cannot be overlooked, but in the context of the site having been allocated for housing for some 20 years, the historic form of the road network surrounding the site remaining unchanged in that time, the contribution that this development would make towards meeting current private market and affordable housing need, that the application site would have a second access onto Robergerie leading to a safe junction onto Route Militaire, and that substantial provision is to be made for both resident and visitor bicycle parking (including for electric bicycle charging) with the potential to encourage alternative means of transport to the private car, the balance of the assessment in this instance is that this issue does not warrant the refusal of planning permission. The planning covenant recommended to be entered into prior to permission being granted would include provision for a financial contribution to the States of a maximum of £11,500 for potential highway works at the Pointues Rocques/St Clair Hill junction if required to mitigate the deficiency in egress visibility.

In terms of the wider traffic management implications of the proposed development, it is noted that St Clair Hill/Vale Road would operate within capacity if this development is treated in isolation of other committed developments and that Braye Crossroads would operate broadly at capacity during the morning peak and within capacity at other times.

However, the IDP does include significant other development sites in the vicinity of Pointues Rocques (Housing Allocation Sites, Datapark site, Leale's Yard), as well as windfall housing sites the subject of approved Development Frameworks, and a likelihood of increased pupil numbers at St Sampson's High School following the recent Education debate and States decision. These committed and potential future developments have the potential to result in significant cumulative traffic management impacts. Whilst ARUP have previously put forwards suggestions as to how it might be possible to accommodate development in this part of the Island and all junctions work within capacity, the methodology on which those suggestions were made has not been interrogated, and evidence available to THS indicates that vehicle movements and the profile of vehicle peak hour movements along Braye Road and Route Militaire has remained relatively constant when pandemic related fluctuations are factored out.

THS' concerns in this regard are entirely reasonable, and cannot be discounted lightly. However, it must be acknowledged that the capacity of the Island's road network in its current form, both in terms of the volume of traffic that it can comfortably handle and the potential for it to be altered/improved, is finite, and this was known when the IDP was approved and sites such as this allocated for development to meet the Island's need for housing.

Consequently, and as with road safety concerns relating to the Pointues Rocques – St Clair Hill junction set out above, in the context of the site having been allocated for housing for some 20 years, the contribution that this development would make towards meeting current private market and affordable housing need, and that substantial provision is to be made for both resident and visitor bicycle parking (including for electric bicycle charging) with the potential to encourage alternative means of transport to the private car, the balance of the assessment in this instance is that this issue does not warrant the refusal of planning permission.

#### Design and amenity

The Development Framework sets an indicative density range of 30-50 dwellings per hectare, which would provide a yield of between 75-125 dwellings across the allocated site as a whole. This application proposes the construction of 68 dwellings within the Phase 1 site area, and anticipates a further 31 dwellings being constructed on the Phase 2 land (albeit this latter figure is not fixed). This application for 68 dwellings is therefore consistent with the Development Framework, and on the basis of the assessment set out below can be seen to make an effective and efficient use of land in accordance with the aims of Policy GP10.

The layout of the development is based on a network of streets that frame the perimeter of the site and create two internal blocks. Buildings line the perimeter of the site and the outside of the internal blocks. The houses are arranged in a series of terraces of between 3 – 5 houses and a similar arrangement occurs with the internal blocks of flats. Gaps between the terraces of the houses and blocks of flats helps to break up the built form to maintain a sense of openness, whilst at the same time reflecting and reinforcing the built character of the locality.

The proposed buildings are of a domestic scale and height, varying between 1 ½, 2 and 2 ½ storeys, and follow the topography of the site as levels change from east to west. This scale and height reflects the varied scale of other buildings in the immediate vicinity, and would not appear visually incongruous in either short or longer distance views.

The design of the proposed houses facing onto Pointues Rocques is more traditional, reflecting the character of roadside development to the east within the Delancey Conservation Area. Within the site buildings follow a more contemporary architectural approach, albeit one that draws from the local character through the use of design elements such as steeply pitched roofs.

All of the proposed houses are to be provided with private rear gardens, while the maisonettes and flats are to be served by balconies and small patios with access onto larger areas of communal open space located at the centre of Courts A and B above the parking areas. The type and size of open space to be provided is considered to be acceptable, such that it would be unreasonable to insist on the provision of public open space within the application site. The site's very close proximity to Delancey Park, which serves as a high quality recreational space for the wider community as a whole, reinforces this conclusion.

Notwithstanding differences in ground level across the application site and between neighbouring properties and land, the proposed buildings are of a scale and shown to be positioned a sufficient distance from sensitive site boundaries so that they will not result in any materially harmful overbearing, overshadowing or overlooking impacts on neighbouring residential amenity.

In accordance with the requirements of Policy GP18, the development incorporates public art in the form of decorative gates at the entrances to the parking areas serving Courts A and B. The design of these gates responds to the site's former horticultural use, which is considered to be an appropriate and creative response and one that will contribute to creating a sense of place for future residents.

Having regard to Crime Prevention Through Environmental Design (CPTED) principles, the proposed layout has been assessed as creating a network of streets that are enclosed by buildings that face onto the streets. This promotes passive surveillance of the streets, and separates public spaces from the private spaces/back of buildings (e.g. private or communal gardens). This is an effective means to design out any leftover spaces that often attract crime and anti-social behaviour. It also makes it harder to gain access to the buildings from the rear, which reduces the risk of burglary.

In accordance with the requirements of Policy GP9, the application is supported by information that sets out how the development has been designed to consider the site layout and orientation of buildings, form of construction, flood risk management through the adoption of a sustainable urban drainage (SUDs) approach, energy conservation, renewable energy production (photovoltaic panels on south, east and west facing roofs), waste management and Lifetime Homes standards. Provision is also made for communal electric bicycle charging areas, and ducting to enable electric vehicle charging points to be installed if desired by future occupants of the development. Further information sets out how the proposed materials for the buildings have been considered. Overall this

information is considered to appropriately demonstrate how sustainable development principles have informed the design process.

With regards to the impact of the proposed development on the character of the Delancey Conservation Area and the setting of nearby protected buildings, the following conclusions are drawn.

Firstly, designation of a Conservation Area is not an absolute barrier to future development within its boundaries, as made clear by Policy GP5. The character of the Delancey Conservation Area is defined at Annex VII to the IDP, and summarised within the Development Framework as follows:

*The particular character of this Conservation Area is represented by the use of traditional materials and the unity of built form in terraces and groups of workers' cottages. The villas and cottages are attractively arranged along the roads, often behind roadside boundaries, and part of the character is the variety of building sizes and shapes. The open space, hougue landscape and vistas of Delancey Park also form an important part of the character of the Conservation Area. (para. 4.7)*

The Development Framework goes on to identify specific features which may influence development proposals on this site:

- *Low boundary walls which define the relationship between public and private space at the front of dwellings;*
- *Unity of built form in terraces;*
- *Breaks in built form to provide a sense of openness;*
- *Predominant materials are painted render with slate and pan-tile roofs, along with granite/stone boundary walls. (para. 6.5)*

Notwithstanding representations that have been received, neither the IDP nor Development Framework identify the application site, nor any of the structures/features within it, as contributing to the interest of the Conservation Area. The tall granite boundary wall adjacent to Pointues Rocques is undoubtedly an attractive and historic feature, but its demolition and replacement with lower granite walls either side of the new site access, enclosing the front gardens of new houses of traditional scale and form, is considered to make an equal contribution to the character of the Conservation Area.

In this context, and in light of the assessment set out above in relation to the design and layout of the proposed development and how that responds to and reinforces those aspects of the Conservation Area that define its character, it is considered that the application complies with the Law, the aims and objectives of Policy GP5, and the requirements of the Development Framework.

The closest protected buildings ('The Cottage' and 'Knowhere') are located c.20m to the north-east of the Robergerie site access and c.50m from proposed units 1-3 in the north-west corner of the application site. The only other protected buildings that adjoin the Housing Allocation site are on Rue Des Monts to the east ('Delancey Park House' and 'Alta Vista'), c.180m away from the eastern application site boundary. Other protected buildings on St Clair Hill are located between 45 – 100m away beyond intervening

buildings and at a lower level. The application site is not considered to form part of the setting of any of these protected buildings, and the degree of impact on their special interest has been assessed as being low or negligible in each case. This very low level of impact is considered to be outweighed by the wider social and economic benefits connected to the delivery of this site for housing, and consequently the application is considered to comply with the Law, the aims and objectives of Policy GP5, and the requirements of the Development Framework.

In light of all of the above the application is considered to comply with relevant statutory duties under the Law, the aims and objectives of policies GP1, GP4, GP5, GP8, GP9 and GP18, and the requirements of the Development Framework.

#### Ecology and landscaping

The application site is not the subject of any formal designation as an Area of Biodiversity Importance (ABI) or Site of Special Significance (SSS), and IDP policies GP2 and GP3 do not apply. Land to the north designated as Important Open Land and partially as an ABI is beyond a tall granite wall, and will not be altered or affected in any way.

Following approval of the Development Framework, and with regards to paragraph 7.29 in particular, the applicant requested that the States' Biodiversity Officer assess the site. This assessment was carried out in July 2019, it being noted that *"The majority of the site is under glass and, due to recent heavy disturbance is mostly devoid of vegetation. I would expect it to contain very limited biodiversity."*

Some features of ecological interest were identified however, including a dry stone wall, an overgrown horticultural reservoir, and semi-improved grassland to the south of the existing glasshouses. Recommendations were made that the dry stone wall be retained, or similar connecting features created, that new freshwater habitats should be created, that small mammal, slow worm, bat emergence and breeding bird surveys be carried out, that bird and bat boxes be provided as part of the development, and that the loss of the semi-improved grassland should be offset by developing similar habitat elsewhere. Other recommendations relate to the timing of works in the context of the Animal Welfare (Guernsey) Ordinance, 2012. Similar comments have also been made by La Societe Guernesiaise.

Subsequent to this the States' Strategy for Nature, 2020 was adopted as Supplementary Planning Guidance, which can be taken into account when decisions on individual planning applications are being reached insofar as is lawful and proportionate under the Law and the relevant provisions of the IDP. The Strategy for Nature can be seen as a high-level document, setting out a framework of shared goals and objectives for the States of Guernsey, private sector and community to strengthen Guernsey's response to the changes facing nature from climate change and other human made pressures. Insofar as it is relevant to this application, it can be seen to provide general encouragement for design approaches that consider opportunities to protect or enhance biodiversity.

In the context of the Law and IDP, given that the site is not the subject of any form of ecological designation, and notwithstanding the recommendations of the States' Biodiversity Officer, it would not be reasonable to insist on pre-determination or post-decision surveys or habitat offsetting on another site elsewhere in the Island. This

conclusion is reinforced by the fact that the glasshouses, other structures and vegetation could be cleared at any time without the need for planning permission, and that the site is allocated for residential development at relatively high density. The provisions of the Animal Welfare (Guernsey) Ordinance, 2012 are separate to the planning process and apply regardless of whether planning permission is granted or not.

Detailed landscaping proposals have been submitted, which are considered to represent a good quality of design, are well integrated into the scheme for managing surface water within the site, would create an attractive public realm, and provide an effective buffer between the proposed buildings and neighbouring residential properties.

The applicant's landscaping designer has also provided a brief explanation of the ecological benefits that the proposed planting scheme could deliver:

*I have tried to add in as many possible species of Plants and Trees to encourage wildlife to the area. As a guide I referred to the RHS Plants for Pollinators List (Link Below) and selected plants that are known to grow well in the Area. The Boundary planting and areas around the access roads have all been specified to be Trees with underplanting of Native Species to create a Natural environment, this in turn will form a great Habitat and food source for our Wildlife. Planting throughout the Development has been selected to give all year-round interest, flowering plants, and plants that berry will encourage Pollinators and all types of Wildlife.*

The applicant's agent has further highlighted that the proposed swales, which form part of the SUDs proposal for the site, have the potential to mitigate against the loss of the wetland habitat centred on the overgrown horticultural reservoir, whilst bat and bird boxes will be positioned on suitable gables. Precise details of these features can be controlled by way of condition.

The submitted ecological information is brief, and it cannot be concluded that the development would deliver biodiversity net gain as encouraged by the Strategy for Nature. However, considering that the genesis of this application and approval of the Development Framework occurred before the adoption of the Strategy for Nature as Supplementary Planning Guidance, that the site is required to deliver a relatively high density of development, and that the proposed landscaping scheme is considered to be acceptable in and of itself, it is accepted that to do more than already indicated would likely require further and potentially more fundamental revisions that could delay or jeopardise delivery of the site for housing. As such, what is proposed is considered to be proportionate and acceptable in accordance with the purposes of the Law, the aims and objectives of the IDP and Supplementary Planning Guidance, and the requirements of the Development Framework.

#### Planning covenant

In order to secure the transfer of the land allocated for affordable housing and on-street public car parking, and for other potential highway works that may prove necessary (referred to above), and to ensure that access to the Phase 2 land will be provided without unreasonable impediment, it is necessary for a legal covenant to be entered into as described in section 23 of the Land Planning and Development (Guernsey) Law, 2005. It is proposed that such agreement shall deal with the following matters on implementation of

the planning permission, and as the case may be prior to occupation of the market housing: -

- The transfer to the Guernsey Housing Association of the agreed contribution land to facilitate 30% of the residential developable area of the development for Affordable Housing
- The construction of the affordable housing to GHA scheme development standards on open book terms to be agreed
- Management company being established for the maintenance of communal areas on equitable terms between the householders of the affordable and market housing
- A payment for off-site highways works to be delivered by Traffic & Highway Services for traffic management purposes
- The transfer of 6 spaces to be maintained by Traffic & Highway Services subject to construction to technical standards set by Traffic & Highway Services
- The constructed provision of agreed Access Rights – to be maintained by a management company.

#### Other matters

The application is accompanied by a Construction Environmental Management Plan (CEMP), the content of which has been revised following deferral. This has been assessed by Environmental Health, who suggest a number of relatively minor changes that can appropriately be dealt with by way of condition. Future adherence to the CEMP can similarly be controlled by way of condition, which should ensure that development of the site is carried out in a way that minimises adverse impacts on local residents and the surrounding area so far as is reasonably possible, in accordance with the aims and objectives of Policy GP17.

Other conditions requested by Environmental Health relate to noise generated by fixed plant and machinery that will or may need to be incorporated in the development and contaminated land given the site's former use a commercial vinery, both of which are reasonable.

The application is accompanied by a Site Waste Management Plan, the implementation and outcomes of which can appropriately be controlled and monitored by way of conditions in accordance with the aims and objectives of Policy GP9.

The provision of 6no. additional parking spaces to serve the residents of St Clair Flats will require the applicant to reach separate agreement with those parties as to the precise nature of the transfer of that land or of any rights and restrictions that may apply. As no such agreement has been reached, it is not possible to treat this aspect of the proposal as being deliverable in the form currently proposed. However, as this is not considered to be an issue that is material to the outcome of the application as a whole, it would be reasonable to impose a condition requiring final details as to how this area is to be dealt with at a later date.

### Conclusion

It is acknowledged that representations from the Douzaine, other organisations, and members of the public raise valid concerns, as do consultees, particularly Traffic and Highway Services. It is also acknowledged that those concerns remain unresolved in several areas.

As noted above however, it is not always possible for an applicant to achieve compliance with each and every requirement of the IDP. In such cases the Authority, as decision taker, must balance positive and negative factors in the context of the IDP as a whole, as conflict with planning policy in one or more areas does not automatically mean that permission could reasonably be refused.

In this case the fact that this is an allocated housing site, and therefore intended and expected to be developed as proposed in order to contribute towards meeting the Island's need for private market and affordable housing, weighs very heavily in favour of the application. This is reinforced by the fact that the application accords with guidelines set out in the Development Framework for the site.

Consequently, and notwithstanding the shortcomings that have been identified, it is recommended that planning permission be approved.

**Date:** 28-09-2021



## **Appendix A – Consultation responses**

### **Traffic and Highway and Highway Services**

**04 October 2019**

#### **Validity of Traffic Impact Assessment**

Traffic and Highway Services (THS) has noted that the application has been submitted with a Traffic Impact Assessment (TIA) dating back to 23<sup>rd</sup> May 2017 plus an Internal Design Layout Note dated 11<sup>th</sup> August 2017. The TIA considered development proposals based on low and high density scenarios (60-146 units) whereas it is understood that the Development Framework now guides development to between 75 and 125 dwellings.

THS has also previously commented in a memorandum dated 7<sup>th</sup> February 2018 regarding further information ARUP has provided on trip distribution to the east of the site and revised modelling of the traffic signal junctions at Braye Road/Route Militaire and St Clair Hill/Vale Road Signals based on the actual signal set up. This addendum/clarification document does not appear to be in the documents sent to THS but is considered relevant to the application.

The ARUP 2017 TIA considered the highway implications of the development in combination with background traffic flows and committed development at the Data Park, Extension Vinery and Leale's Yard. However, potential development at the other Housing Allocation sites was scoped out. This was based on the historic practice of THS to only request data be included in a TIA for sites of sufficient scale and with live planning permission. However, it would appear, based on correspondence with Planning Officers that there is more certainty about development in the case of Housing Allocation Sites (HAS) and therefore to ensure a robust assessment, other more recent TIAs have been required to scope these sites into the assessments. There is also more certainty about the development at the St Sampson's High School site now that the States has made the decision to allocate funding. In this context, whilst THS is reluctant to recommend changing the criteria during the process of an application, it cannot dispute that a TIA encompassing the School and other HAS would provide a more robust assessment and identify the extent of pressures that are likely to occur on already busy junctions such as Braye Road/Route Militaire. There is also a higher degree of certainty about scale of development at this HAS than there was in 2017, although it is considered ARUP's conclusions would unlikely be affected unless the fundamental issue of whether other HAS and the school development is taken into account.

#### **Specifics of the plans as submitted**

THS welcomes that site layout includes provision of accesses adjoining both Pointues Rocques and Robergerie Road. This is consistent with the idea of spreading the additional vehicular movements across both Neighbourhood Roads given there is no apparent option to provide site access onto a road where there are dedicated facilities for vulnerable road users. It is also in the context that the additional flows would not take the Neighbourhood roads past their functional capacities (volumes) based on guidance in the Traffic Engineering Guidelines for Guernsey.

Notwithstanding the above, it has been highlighted that the sections of road to the east of the site are more problematic. This is in the case of Pointues Rocques, the two right angled bends where forward visibility is restricted and in the case of Robergerie Road, the significant narrowing near Rue Queripel. THS has noted that the Development Brief includes mention of accesses being designed to encourage drivers to exit to the west (towards Route Militaire/St Clair Hill) but the designs submitted are not likely to achieve this and it may well be necessary for THS to introduce enforceable signage. However, THS would welcome if further thought could be given to whether the access designs can be amended to deter exiting towards the east.

In terms of the Pointues Rocques access it has been noted that provision is being made that would broadly accommodate service vehicles although it is unclear what access radii are being proposed and no swept path analysis has been provided to indicate whether vehicles would be able to make the left turn out with what is assumed to be raised cobbles on the eastern side of the access (Drawing No. 6274-01 B2 C). THS was expecting an access design angled in a similar manner to the southern end of Royal Avenue (Royal Avenue/St Julian's Avenue junction) but understands encouraging the right turn out only is more difficult given the 2-way width of the junction.

The sightline standards for the above proposed access would meet the guidelines subject to the roadside wall broadly adjacent to unit nos. 11 to 14 being lowered/rebuilt to a height not exceeding 900mm as shown in drawing 6274-01 B27 C.

With regard to the Robergerie access the ARUP Internal Design Note indicates that it will be the main site access and be required to accommodate fire tenders. Whilst there is swept path analysis shown in drawing No. CH\_SK\_001 this is for a 7.5T vehicle and the access design appears to have been modified in drawing No. 6274-01 B2 C. THS would welcome confirmation of the class of vehicle the access has been designed to accommodate, whether it remains the main point of access in the plans submitted and swept path showing a 7.5T lorry (particularly the left turn out). Similarly to the above, THS was expecting to see an access angled to encourage egress towards Route Militaire

With regard to the sightlines that would be observed from the Robergerie access, it is noted they would be 33m to the west but the 33m sightline in the direction of oncoming traffic is conditional on agreement being reached to modify a party wall. The detail of the application does not make it clear whether that agreement has been reached at this point. Without it the sightline in the direction of oncoming traffic would be limited to approximately 18m.

### **Major road Junctions**

THS advised in its memorandum of 22<sup>nd</sup> September 2017 and subsequent memorandums that the junction of Robergerie/Route Militaire and Pointues Rocques/St Clair Hill are capable of accommodating the extra movements generated by development (and at a higher density than outlined in these proposals). However, the use of Pointues Rocques was caveated with advice that this should be subject to improvement in the sightline in the direction of oncoming traffic in the case of the Pointues Rocques/St Clair Hill junction. THS also indicated that modification of a turning radius in the case of the Robergerie junction should take place.

In regard to Robergerie/Route Militaire junction it is noted that Plan No. 6274-01 B32 indicates modification is subject to landowners consent but there appears no clarification in the application whether consent has been forthcoming. With regard to Pointues Rocques/St Clair Hill, THS has taken the opportunity to write to 3 landowners to assess their interest in their front boundary walls being lowered for road safety reasons and not at their expense but no written responses have been received at this time. This is despite a reminder letter being sent.

### **Impact on on-street parking**

THS welcomes that it proposed to provide 6 spaces of public parking through realignment of the roadside wall on the southern side of the site. This would provide an opportunity to provide 2-way road width between the proposed site access in Pointues Rocques and St Clair Hill but with no net loss of spaces which are known to be well utilised. THS would welcome confirmation whether it planned to cede the land to the States.

### **Footpath width within the site**

THS has noted the proposal to include footpath widths within the site of 1.0m width and this would be consistent with Part P of the Building Regulations although not consistent with the advice of Manual for Streets. For context, the Committee *for* Environment & Infrastructure has set policy guidelines for new public footpaths with a recommended standard of 1.8m with an absolute minimum of 1.2m. Whilst it is appreciated the footpaths would not be located on the Public Highway, the Committee's emphasis is on improving facilities for pedestrians and in this context THS would welcome if the minimum standard could be considered for this site given the proposed scale of development.

### **Parking Standards**

The car parking standards provided within the site do not appear to exceed the maximums expected under the IDP standards although it is disappointing that no dedicated provision for motorcycle parking is shown on the plans and THS would welcome if clarification could be sought on where this is intended to take place. Similarly THS would like clarification on where it is intended to provide the (covered?) bicycle spaces for units 1 to 30.

### **Conclusions**

In February 2018, THS advised that the development site is not ideally situated in terms of characteristics of the highway network and therefore dilution of traffic flows (through the 2 access option) would be worthy of consideration by the DPA. THS therefore welcomes that this has been adopted in the plans. However, the suggestion was with a proviso that a suitable position could be found for an access in Pointues Rocques and also that improvements to the sightline in the direction of oncoming traffic at the junction of Pointues Rocques/St Clair Hill could be made. Further THS had based its advice on the understanding that agreement could be reached with the landowner to the north of Robergerie/Route Militaire in order to remove the issue of drivers waiting at the STOP line preventing the turn in from Route Militaire. In absence of any degree of certainty on these matters or that agreement has been reached to ensure the sightline in the direction traffic for motorists emerging from the site onto Robergerie Road would meet minimum standards, THS opposes the application on road safety and traffic management grounds.

In addition, in the context that other developers are now being required to produce TIAs that include data for traffic movements associated with Housing Allocation Sites and also that there is now more certainty about sites to facilitate transformation of education provision, THS believes there are grounds for a revision of the TIA.

#### 15 September 2021

For the sake of clarity, this response details the various areas which Traffic and Highway Services (THS) believe should be considered in respect of the current application. Information has been drawn from various of previous communications relating to THS' involvement in contributing advice and recommendations to the Development Framework and previous submissions relating to the site. For ease, where previous communications have been referenced, the commentary has been included within this submission in order to save referencing previous information in multiple documents.

The current application which relates to Phase 1 of development states a quantum of 48 houses and 20 flats providing accommodation for 256 people. In relation to parking, this phase of the development would result in a total of 133 car parking spaces (of which 18 accessible bays), with provision for 31 motorcycle parking spaces and storage for 137 bicycles.

The main commentary in this response relates to the latest Traffic Impact Assessment (TIA) authored by ARUP dated September 2020 and submitted as part of the application. This TIA is based around the overall development of the whole site (Phase 1 and Phase 2) and the creation of 99 residential units at the site. This application relates to a total of 68 units. The latest TIA uses traffic data collected for the 2017 TIA, but has been updated in light of the previous commentary on the 2017 TIA.

In summary, the main criteria areas for THS to consider in respect of this application and the TIA are as follows:

#### **Site Analysis – Road Network / Traffic Management**

THS would agree that if the site is developed at the scale proposed that two points of access in Robergerie Lane and Pointues Rocques provide the most suitable method of vehicular access to the site than a single point of access. This is in the context that both Robergerie Lane and Rue des Pointues Rocques are Neighbourhood Roads of which only a short section has pedestrian infrastructure, and the road geometry at certain points presents specific problems due to the narrowness of the carriageway (single lane) or blind bends.

#### **Road Safety**

It is appropriate that the road safety risks associated with a development of this scale are considered in relation to any road safety issues associated with the sightlines / road geometry at the points of access to the development – Robergerie Road and Rue des Pointues Rocques. Additionally, commentary on the same criteria where these roads have junctions on the Traffic Priority Route (St Clair Hill) is also given. A further consideration are the road safety implications, particularly in respect of vulnerable road users who use the Neighbourhood Road network in the area of the development and in the context that the States has approved a Strategy that prioritises these user groups.

### **Traffic Impact Assessment**

THS has noted that the application has been submitted with a revised Traffic Impact Assessment (TIA) dated 2 September 2020 plus associated plans which address a number of areas previously commented on by THS. This TIA is the third relating to the site, with the two previous assessments in 2010 and 2017 relating to the Draft Development Framework and the previous application for the site based around the scale of development being between 60-146 units.

As stated, within the TIA the key differences now relate to the total number of units being reduced to 99 as well as a further pedestrian access that joins the Rue des Pointues Rocque adjacent to the St Clair Flats building. The TIA also addresses key areas of concern when reviewing the 2017 TIA, particularly in respect of the cumulative traffic impact of allocated/committed development in the area (predominantly Housing Allocation Sites, Datapark site and Leale's Yard). This has helped to inform the junction capacity modelling. The allocated/committed development sites included within the TIA are detailed at section 7.

From a traffic modelling perspective, the TIA includes data and modelling on the following junctions:

Braye Crossroads – signalised junction  
St Clair Hill / Robergerie Road - priority  
St Clair Hill / Rue des Pointues Rocques - priority  
St Clair Hill / Vale Road / Le Murier - signalised junction  
Vale Road / Les Banques – Halfway filter junction

Analysis of the junction capacity data contained within the TIA (9.15), indicates that compared with background traffic flows the Pointues Rocques site 'contribution' to overall traffic capacities at the major junctions modelled closest to the development site would lead to minimal impact on delays.

As noted in the TIA (7.19) two scenarios of traffic management were previously detailed in the St Sampson's High School (SSHS) TIA. With a baseline assuming staff travel patterns would continue; and a 'sustainable' scenario. In respect of this report, the baseline from the SSHS TIA is included as part of the high-density committed development modelling, with the 'sustainable' scenario forming part of the data relating to the low-density modelling.

It should be recognised that at the time when the TIA for the Pointues Rocques site was authored, the St Sampson's High School TIA in respect of the two-school model was still extant, and therefore the modelling within the Pointues Rocques TIA reflects the additional vehicle movements associated with St Sampson's High School site under the low-density and high-density committed developments data. Due to the differing models and data available, it is not possible to caveat the response to the Pointues Rocques TIA with a 'deduct x percent' of vehicle movements to determine how the TIA would change if the St Sampson's High School TIA data was not incorporated into the TIA or was included but at a lower level in terms of traffic generation.

In relation to the St Clair Hill / Vale Road / Le Murier signalised junction, the TIA identifies that the junction would be severely congested in the morning peak if all committed development at the sites detailed within the TIA take place. Modelling the effect of the Pointues Rocques site in isolation when considering traffic movements through the junction in the morning peak does not adversely affect queues at the junction (See section 9.15).

### Specifics of the plans as submitted

THS welcomes that site layout includes provision of accesses adjoining both Rue des Pointues Rocques and Robergerie Road. This is consistent with the idea of spreading the additional vehicular movements across both Neighbourhood Roads given there is no apparent option to provide site access onto a road where there are dedicated facilities for vulnerable road users. It is also in the context that the additional flows from this development would not be expected to take the Neighbourhood roads past their functional capacities (volumes) based on guidance in the Traffic Engineering Guidelines for Guernsey. This is based on a comparison of the observed traffic flows in the two road sections referenced and then adding the modelled movements from the site and comparing this with the functional capacity of the road sections. Within the (TIA Annex A – Fig 3: Observed Traffic Flows) shows total recorded vehicle movements in the morning peak at 150 in Rue des Pointues Rocques and Robergerie Road at 111, with the trip assignment (TIA Annex A – Fig 6) calculated for the site increasing these volumes to Rue des Pointues Rocques at 174 movements (increase of 14%) and Robergerie Road at 127 (increase of 13%). Based on the Traffic Engineering Guidelines (Appendix 1) the traffic volumes compared against road-width is predicted to fall within the functional capacity.

Recommended Road Widths Based on Design Flow									
Road Width (m)		4.1	4.8	5.5	6.1	6.7	7.3	9.0	10.0
Traffic Flow (vph)	No Frontage Activity	240	600	950	1300	1700	2000	2600	3000
	Frontage Activity	200	500	800	1100	1400	1700	2200	2500

As stated in the previous THS response; “Notwithstanding the above, it has been highlighted that the sections of road to the east of the site are more problematic. This is in the case of Rue des Pointues Rocques, the two right angled bends where forward visibility is restricted and in the case of Robergerie Road, there is significant narrowing near Rue Queripel.”

The plans submitted with this application show the method by which the developer seeks to encourage drivers egressing the development to turn towards St Clair Hill, as opposed to turning towards Delancey Park or Rue Queripel.

The swept path analysis plans (6274-01-B38 and 6274-01-B39) show the provisioning of raised cobble areas (on the eastern side of both accesses) which would then make turning vehicles more difficult, either left from the Rue des Pointues Rocques or right from the Robergerie Road accesses. Given that the accesses will be wide enough to enable vehicles turning in and out of access to pass each other, these raised cobbled areas would not prevent a vehicle turning from the access to the east if the driver is determined to do so, but could act as physical means of encouraging drivers to turn from the accesses towards St Clair Hill. The swept path analysis indicates that for vehicles that would be considered as ‘legitimately’ turning eastwards from the access, the cobbled areas would have a relatively

minimal effect, with the rear axles of rubbish compactors passing over them by necessity and fire appliances if necessary. Given the hours of night that a rubbish compactor would be in the area or the instances that a fire appliance would be attending, it is not considered to be a material consideration. Therefore, THS acknowledge that both accesses will be suitable for access or egress by vehicles up to the size of a rubbish compactor.

### **Trip Distribution**

In relation to trip distribution, the TIA states that 3% of drivers would turn eastwards from the site's accesses. This figure was revised from 2% in the 2017 TIA. As detailed at section 11.8 of the TIA, the basis of this figure is the marginal increase in employment opportunities that are located in the Longue Hougue area (east of the site).

It should be noted that THS has some concerns in relation to what is considered to be a low estimation 3% of vehicle movements that are predicted to turn from the site towards the east. This is based on our own experience of traffic flows in this area of the island. Although THS are appreciative that the 'human' factors that influence a driver's choice of route cannot easily be factored into traffic modelling of the sort that forms the basis of this type of TIA, THS is aware that the build-up of traffic in the morning peak especially, results in some drivers electing to take geographically longer routes, which enable them to bypass congested junctions with the intention of achieving a shorter journey time.

By definition the 'rat-running' of vehicles through the neighbourhood road network east of the development site, in roads and lanes with narrow road geometries and in many cases without pedestrian infrastructure is a key concern for THS in the context of this development and the trip generation that would be associated with it. Understandably, intensification of traffic movement on the Neighbourhood Roads east of the site does not assist in respect of encouraging active travel to the school, park, Main Centre or more generally. With this in mind it may be necessary for THS to install road signage to prohibit exiting to the east from the site but would consider this further in light of experience should the development proceed. THS would comment that the trip distribution's methodology of using a driver's destination by locality of the driver's employment is perhaps slightly flawed in the Guernsey context by virtue of the number of drivers from across the island who (due to the island's relatively short commuter journeys when compared with UK commuter journeys) drive to interim destinations, prior to driving to their ultimate destinations. Most commonly, this will see for example drivers on the island's roads in the morning peak dropping children at child-care facilities, school, or dropping family members to their place of employment before driving to their ultimate destination. However, it is acknowledged that this method of trip distribution has been accepted in many Guernsey development site TIAs.

Section 6 of the TIA shows the methodology used to calculate the relative 'split' of the vehicle movements based on workplace distribution across the island. As such, THS acknowledge the TIA's methodology which results in 2/3 vehicle movements from the site towards St Peter Port are likely to use the Rue des Pointues Rocque access to egress the site.

### **Access Sightlines**

In referencing the details of sightlines and access geometry of the Robergerie Road access shown and annotated on drawing 6274-01 B2 D, THS would accept that the access design by way of the bell-mouth design, and routing of vehicles being influenced on egressing by the provision of the raised island on the egress lane, will enable the 33m sightline standard relating to oncoming traffic to be met without further measures being undertaken. Similarly, the reduction of the boundary wall adjacent to the Rue des Pointues Rocques access, coupled with the bell-mouth design of the access enables the 33m sightline standard to be met from this access also.

### **Impact on on-street parking**

Per previous communication in respect of the site, THS welcomes sight of plan 6274-01 B6 D which shows the provisioning of six public parking spaces on the boundary of the site in Rue des Pointues Rocques created by realignment of the boundary wall. This would provide an opportunity for 2-way road width between the proposed site access in Rue des Pointues Rocques and St Clair Hill but with no net loss of spaces which are known to be well utilised. THS note the applicants' intention to cede this land to the States as referenced in section 8 (other matters) of the letter from the applicants' architect which accompanies the application.

### **Parking Standards**

The car parking standards provided do not exceed the maximums expected under the IDP standards. THS notes the additional detail within the plans supplied (6274-01 B5 D and 6274-01 B6 D) in relation to the parking provision previously requested by THS.

THS also note the provision of motorcycle parking and both the covered and visitor cycle storage areas, Inc. E-bike charging facilities as shown on plan 6274-01 B13 D. Both facilities are particularly welcomed given that the site as previously identified offers residents and visitors alike good opportunities to use active travel options to the main centres, at least in terms of distance to the main centres.

### **Footpaths width within the site**

THS welcomes the change of footpath width within the development to a width of 1.2m detailed within section 4 (TIA) of the letter from the applicants' architect which accompanies the application.

The provisioning of pedestrian routes through the development, and in particular the ability for pedestrians from within the site, or who have walked through from Robergerie Road to egress via a shared access (with St Clair Hill Flats) as shown on plan 6274-01 D are welcomed, given that pedestrians using this route are likely to be then walking up the top section of the Rue des Pointues Rocques towards Delancey Park / Rue des Monts. The ability for pedestrians to walk from the site towards the Delancey Park without the possibility of conflict with vehicles entering or egressing the site in Rue des Pointues Rocques, or walking around the blind corners in order to walk to Delancey Park is considered a positive contribution to vulnerable road users in the context of this site. THS would accept the point made in the applicants' architect's letter (Section 8 – other matters) that given the width of the Rue des Pointues Rocques at 4.44m in the section adjacent to the site's access would not enable a painted walkway to be used without constricting traffic flow.

## **Major Road Junctions**

THS advised in its memorandum of 22<sup>nd</sup> September 2017 and subsequent memorandums that the junction of Robergerie/Route Militaire and Pointues Rocques/St Clair Hill can accommodate the extra movements generated by development (and at a higher density than outlined in these proposals). However, the use of Pointues Rocques was caveated with advice that this should be subject to improvement in the sightline in the direction of oncoming traffic in the case of the Pointues Rocques/St Clair Hill junction. THS also indicated that modification of a turning radius in the case of the Robergerie junction should take place.

The TIA makes reference to the Robergerie/Route Militaire junction at 3.2, specifically that it is difficult for a southbound driver of a larger car on Route Militaire wishing to turn left into Robergerie Road, to carry out the manoeuvre when a vehicle is egressing Robergerie Road. Previously, THS has requested that consideration be given to whether the junction geometry should be changed (by way of reshaping the boundary of the property that makes the northern side of the junction and realignment of footpath). Based on the traffic management impact of the proposed development being modelled as a 1 second delay during peak hours (shown at Table E2), THS would concede that it is not necessary to carry out physical changes to the junction in respect of this application.

As previously stated in respect of the Rue des Pointues Rocques / St Clair Hill junction and the sub-standard oncoming 15m sightline of a driver egressing Rue des Pointues Rocques, THS wrote to 3 landowners to assess their interest in their front boundary walls being lowered for road safety reasons. Despite a reminder letter being sent, there has been no written response received from any of the property owners. If it is not possible to improve the sightline at this location, it is considered to represent the single most significant road safety risk associated with the development.

## **Committed Development**

In assessing the TIA, THS has had to consider the wider traffic management impact of development in the study area. This has involved looking at the baseline data, the traffic management impacts of the Pointues Rocques development in isolation and then in conjunction with other committed developments detailed within the TIA.

When considering the traffic management impact of the Pointues Rocques site in isolation when compared to baseline traffic volumes on the traffic priority route of Route Militaire, St Clair Hill and Vale Road, the site's trip generation produces relatively minimal impact to the overall traffic volumes on these road sections. Understandably the morning peak calculations of TRICS data result in the most significant trip generation being from the site using these three road sections towards the Halfway filter, with an additional 25 vehicle movements during the period in St Clair Hill / Vale Road – this would increase the baseline in St Clair Hill from 509 to 534 and Vale Road from 606 to 631 vehicle movements. In percentage terms, these additional 25 vehicle movements would represent a 5% increase on baseline vehicle movements (south) in St Clair Hill and a 4% increase on southbound vehicle movements in Vale Road.

Where the situation becomes more acute from a traffic management perspective is when the Pointues Rocques site and baseline vehicle movements are modelled along with the

other sites identified in the TIA as committed development. Due to the locations of the other committed development sites both the Rue des Pointues Rocques and Robergerie Road see a minimal increase in vehicle movements in road capacity terms under both Low-Density and High-Density scaled developments on the other sites. Where the traffic management situation changes in respect of Low-Density and High-Density development of the other committed development sites is the impact on vehicle movements on the Traffic Priority Routes (TPR) that the vehicle traffic from the Pointues Rocques site would primarily use, and the main junctions on those routes.

At a Low-Density development level of the other committed sites, the Route Militaire, St Clair Hill and Vale Road would all see significant increases in vehicle movements. In common with the modelling for the Pointues Rocques site in isolation, the primary routing of vehicles resulting from the committed developments along Route Militaire towards St Peter Port increases from a baseline (+ Pointues Rocques site) of 547 vehicle movements to 704 vehicle movements. This represents an increase of 29% vehicle movements towards St Peter Port on this road section. Similarly, the figures for St Clair Hill southbound under a Low Density development of the committed sites result in the vehicle movements (baseline + Pointues Rocques site) increasing from 534 to 694 vehicle movements in the morning peak hour – this represents a 30% increase from the baseline and Pointues Rocques site in isolation.

Although the southbound figure under the Low Density committed site modelling for Vale Road sees a lesser percentage increase (20%) of southbound vehicle movements than the Route Militaire and St Clair Hill road sections, this figure is arrived at due to the number of southbound vehicles at St Clair Hill which then turn right at the Le Murier traffic signal junction into Le Murier. The 20% increase being an increase from 631 to 756 vehicles southbound on Vale Road – an additional 125 vehicles.

Under a High Density development model of the committed sites, which represents the 'worst case' scenario in respect of cumulative traffic management impact in the road sections considered within the TIA, the traffic volumes on the TPRs; Route Militaire, St Clair Hill and Vale Road increase substantially. The following shows the baseline data with the Pointues Rocques site, the total vehicle movements modelled against a High Density of development and the percentage increases that the additional movements represent:

Road Section	Baseline + PR site	HD Development Total	Percentage increase
Route Militaire (South)	547	914	67%
Route Militaire (North)	226	349	54%
St Clair Hill (South)	534	907	70%
St Clair Hill (North)	211	334	58%
Vale Road (South)	631	835	32%
Vale Road (North)	470	818	74%

Although there are other junctions that would be affected by development of the committed development sites, the main junctions that require consideration from a traffic management perspective in relation to the Pointues Rocques site are the signal junctions at Braye Crossroads and Le Murier / St Clair Hill, and the filter junction at the Halfway.

The TIA has carried out modelling of the two signal junctions named above in order to determine the throughput based on the TRICS data relating to the Pointues Rocques site, other committed sites under both low- and high-density development models and background traffic flows.

The Halfway filter junction is more difficult to model due to filter junctions being unique to Guernsey. This said, the TIA has specified the observed throughputs of the junction and modelled the expected increased vehicle movements. It should also be understood that the throughput of southbound traffic from Vale Road, and Les Bas Courtils through the Halfway filter during peak hours (vehicles routing towards St Peter Port) can be constrained by the overall congestion of vehicles on the Inter-harbour Route. Therefore, unlike current Guernsey traffic signal junctions that can to some extents be 'upgraded' to work more efficiently based on vehicle demand and 'intelligent' detection models, e.g. MOVA, the filter junction at the Halfway has a fixed capacity. In practical terms, and in the context of the TIA and this response, the combination of congestion on the Inter-Harbour Route during the morning peak, coupled with the increase in vehicles from Vale Road and a modelled increase of 92 vehicles from Les Bas Courtils heading towards St Peter Port would see the number of vehicles travelling through the Halfway filter junction theoretically increasing by 17% from a baseline and Pointues Rocques site figure of 1905 to 2224. In practice, it is considered unlikely that the Halfway Filter will be able to process more St Peter Port bound vehicles through the junction during the morning peak than it already does.

On the basis of the above, it is a reasonable conclusion to state that with the Halfway filter junction and congestion on the Inter-Harbour Route preventing any significant gains of throughput to mitigate the additional vehicle movements from the committed developments outlined within the TIA, that the Halfway junction will under either a low or high density development model of the committed housing sites be working over its capacity and unable to cope with the vehicle movements associated with the committed developments. With this in mind, the traffic management impact should then be considered in terms of the queues of vehicles that will form in the three road sections, and fundamentally how these queueing vehicles will then effect throughput at junctions such as Le Murier, which would then have a likely impact on the ability of vehicles from roads such as Rue des Pointues Rocques to join the southbound traffic flow at St Clair Hill. Currently, no detailed data exists in relation to queue lengths on the Halfway junction along Vale Road, but from staff observations, the morning peak will regularly witness queueing vehicles along the length of Les Bas Courtils and at the Halfway's most severe congestion through the length of Vale Road, extending to the signal junction at Le Murier.

### **Traffic Signals**

Analysis of the traffic signal junctions is based around the capacity of the junctions and expressed in terms of saturation. based on the signal timings and vehicle throughput. The TIA shows the saturation stated in percentage terms and in terms of the average peak

hour queue lengths on given arms of the junctions under the different development scenarios. 90% saturation is considered the maximum working capacity of signals.

The difference between the capacity of a junction and the current demand is referred to as the 'Reserve Capacity' (PRC). Again, this is usually expressed as a percentage of the current demand. The higher the reserve capacity (i.e. the more spare capacity) the shorter the queues and delay.

Each arm of a signalised junction can be modelled to calculate the demand / saturation / queues from the specific arm. Signal timings are optimised to achieve the most balanced saturation, therefore the following tables show the saturation and existing queue lengths calculated against the baseline, Pointues Rocques site in isolation, and then the modelling for low and high density development of the committed sites in conjunction with the Pointues Rocques site.

### Signal Junction Capacities

<b>Signal Junctions - Capacity / Model</b>	Baseline Saturation	Queue Length (Vehicles)	Site + Baseline Saturation	Queue Length (Vehicles)
Braye Crossroads Signal Junction				
La Route du Braye (West)	86%	15	87%	15
La Route du Braye (East)	88%	18	88%	17
Route Militaire (North)	71%	13	71%	13
Route Militaire (South)	90%	14	91%	15
PRC	.2%		-1%	

Le Murier Signal Junction	Baseline Saturation	Queue Length (Vehicles)	Site + Baseline Saturation	Queue Length (Vehicles)
Vale Road	43%	6	44%	6
Le Murier	44%	2	44%	2
St Clair Hill	44%	7	46%	7
PRC	103%		95%	

NB: In the above tables, the columns labelled as Queue Length (Vehicles) show the PCU figure for the arm of the junction. It should be understood that the PCU calculation does not relate to a fixed vehicle size.

What can be seen from the above tables is that the existing traffic flows at Braye Crossroads are calculated at running at close to the maximum desirable 90% saturation, and the development of the Pointues Rocque site not materially changing the junction's existing capacity or leading to significant impact on queuing at the junction.

In the case of the signal junction at Le Murier, existing traffic flows show the junction as working at around 45% of throughput capacity, with a calculated 'reserve capacity' of 103%. Again, the trip generation associated with the development of the Pointues Rocques in isolation is not significant in terms of the overall throughput of the junction.

The impact of low-density and high density development of the committed sites on the Braye Crossroads and Le Murier signal junctions is detailed in the following tables – the baseline has been included for comparison:

<b>Signal Junctions - Capacity / Model</b>	<b>Baseline Saturation</b>	<b>Committed Development (LD) - Saturation</b>	<b>Average Delay (seconds) / Queue length</b>
Braye Crossroads Signal Junction			
La Route du Braye (West)	87%	112%	279 - 45
La Route du Braye (East)	88%	110%	252 - 54
Route Militaire (North)	71%	109%	239 - 40
Route Militaire (South)	91%	109%	260 - 35
PRC	-1%	-24%	

<b>Signal Junctions - Capacity / Model</b>	<b>Baseline Saturation</b>	<b>Committed Development (HD) - Saturation</b>	<b>Average Delay(secs) / Queue length</b>
Braye Crossroads Signal Junction			
La Route du Braye (West)	87%	121%	404 - 63
La Route du Braye (East)	88%	118%	366 - 83
Route Militaire (North)	71%	117%	355 - 58
Route Militaire (South)	91%	117%	367 - 46
PRC	-1%	-35%	

<b>Signal Junctions - Capacity / Model</b>	<b>Baseline Saturation</b>	<b>Committed Development (LD) - Saturation</b>	<b>Average Delay (secs) / Queue length</b>
Le Murier Signal Junction			
Vale Road	43%	54%	12 - 9

Le Murier	44%	49%	47 - 3
St Clair Hill	44%	87%	33 - 19
PRC	103%	3.2%*	

\* PRC value needs to be confirmed by ARUP.

<b>Signal Junctions - Capacity / Model</b>	<b>Baseline Saturation</b>	<b>Committed Development (HD) - Saturation</b>	<b>Average Delay (secs) / Queue length</b>
Le Murier Signal Junction			
Vale Road	43%	75%	17 - 16
Le Murier	44%	50%	47- 3
St Clair Hill	44%	201%	1286 - 335
PRC	103%	-124%	

In respect of the Braye Crossroads signal junction, it is evident that under both the low density and high density committed development models that the junction would be subject to vehicle movements far in excess of the PRC, with the both the average delays to vehicles on all arms of the junction being significant, and the length of vehicle queues at the junction being likely to cause further traffic management impacts in the road sections.

The traffic signal junction at Le Murier is a key junction due to its proximity to the Pointue Rocques site and on the St Peter Port side of the development where many journeys would be expected to terminate due to employment opportunities. The modelling shown in respect of low-density development of the committed sites indicates a model of traffic flows which falls within the 90% working capacity of the junction at Le Murier. It should be recognised however, that the cumulative impact of the Halfway junction capacity and throughput referred to previously in this submission and resultant queues of vehicles along Vale Road, are highly likely to cause disruption to the traffic flows through the junction during the morning peak.

In considering the same 'knock-on' effects of vehicle throughput from the Vale Road and Halfway filter junction on the traffic signals at Le Murier, the modelling of the signals in respect of high-density development being carried out on all of the committed sites, represents the most concerning capacity issues and resultant delays, with the St Clair Hill arm of the junction calculated at running at over 200% of the junction's capacity during the morning peak hour. However, it needs to be borne in mind that the modelling does include the traffic movements associated with the two-school model which would inflate the number of movements. Nevertheless, it is worth highlighting the over-demand as calculated is predicted to result in delays to all vehicles getting through the junction, and queue lengths of 335 PCU ('vehicles') from the signals themselves. In this scenario, and assuming a 6.5m 'queuing vehicle length' the modelling firmly indicates a grid-lock

scenario of traffic throughout the Route Militaire and Braye Road TPRs with over 2175m of queued vehicles to the St Clair Hill signal junction. To give a clearer understanding of the distances involved, the Braye Crossroads signal junction is 1,100m from the St Clair Hill traffic signals. In this scenario, it is believed that with the two main TPRs being gridlocked, that an inevitable consequence would be that many drivers would choose to use the network of neighbourhood roads throughout the area in attempts to avoid the gridlock on the TPRs. These Neighbourhood Roads form walking and cycling routes to schools and are in the vicinity of Housing Allocation Sites.

### **Conclusions**

THS is satisfied that that the proposed access design (Robergerie & Pointues Rocques) would meet the minimum recommended design standards within the Traffic Engineering Guidelines for Guernsey. It also welcomes that the design would allow for public parking to be relocated within Pointues Rocques to enable unhindered 2-way flow between the site and the closest major road. Further THS welcomes what would appear to be a convenient pedestrian/cycle link through the site certainly once phase 2 is complete.

However, there remain road safety grounds to oppose the application given the sightline at the junction of Pointues Rocques/St Clair Hill is approximately half of the recommended minimum standard and attempts to address this issue have thus far failed.

THS also has some concern that whilst the Road Engineering Guidelines for Guernsey suggest that the control of frontage activities along Neighbourhood Roads (Pointues Rocques & Robergerie Road) is not important, they also suggest that a safe environment should be created for vulnerable road users. In this location it does not appear practical to achieve segregated facilities and therefore the increased traffic movements are considered would be slightly to the detriment of vulnerable road users. There is however, no road traffic collision data to suggest that these roads are unsafe for vulnerable road users.

In terms of the wider traffic management implications of the proposed development, it is noted that St Clair Hill/Vale Road would operate within capacity if this development is treated in isolation of Committed Developments and that Braye Crossroads would operate broadly at capacity during the morning peak and within capacity at other times.

Importantly the Island Development Plan does include significant other development sites in the vicinity of Pointues Rocques (Housing Allocation Sites, Datapark site, Leale's Yard for example) and also there appears a likelihood of increased pupil numbers at St Sampson's High School, albeit not at the levels that would have been experienced if the two-school model had been successful. It is relevant that the traffic management plans for the 3 school model and separate 6<sup>th</sup> Form Centre have not been published so Traffic & Highway Services is unable to assess the traffic management impact of this change on the junctions in this part of the Island.

When the above developments are taken into account, Braye Crossroads is modelled at significantly over capacity on all arms of the junction in both low and high off site densities. Similarly, St Clair Hill arm of the Fontaine traffic signal is modelled to be extremely over capacity during the high density am peak, although it is thought that this does not take account of the interventions that were being proposed as part of the school proposals.

Significant congestion is already observed at the Halfway filter during the am peak without the impact of the Committed development sites. Given these scenarios THS is very concerned about the cumulative traffic management impact that the committed and school development have the potential to bring.

In Section 9.6 of the St Sampson's High School Traffic Impact Assessment (produced by ARUP) it includes suggestions of how it might be possible to accommodate development in this part of the Island and all junctions work within capacity. THS has not discussed the conclusions with ARUP to fully understand the methodology they used to reach the conclusions they made but it involved a widespread change in travel behaviours for existing road users and also committed development that would see trips reduced by circa 10%. Evidence from the periodic review of the Road Transport Strategy suggested a 4.7% reduction in vehicle movements on major road entry points to St Peter Port between 2014 and 2018. This pattern has not been replicated along Braye Road and Route Militaire based on data from road traffic counters that THS has installed. The profile of vehicle peak hour movements has remained relatively constant when pandemic related fluctuations are factored out.

## Office of Environmental Health and Pollution Regulation

17 September 2019

I have reviewed the proposed plans for the development of 33 dwellings, 22 flats and 13 affordable houses which were received by post on 5<sup>th</sup> September 2019 and there are a number of issues of concern that I must raise.

My comments dated 6<sup>th</sup> September 2017 remain valid, however these are reiterated below for completeness.

### Potential for disturbance during development

Whilst it is noted that a Construction Environmental Management Plan (CEMP) was included in the previous application this was not submitted as part of this application. As such a comprehensive CEMP including reference to BS5228 – 1&2 should be submitted.

The CEMP should include the following:

#### **A comprehensive noise management plan**

- Including details of noise generating equipment (it is noted that the previous application made reference to the use of a concrete crusher on site)
- Specific details on noise mitigation measures that will be implemented
- Details of proposed letter drops and properties that will be included, the letter drop should also be approved by the Office of Environmental Health and Pollution Regulation (OEHPR)
- Details of noise monitoring proposed including details of equipment to be used, personnel who will undertake monitoring, locations of monitoring etc.
- I would suggest that the applicant has regard to the contents of BS5228-1 and uses this as a basis for their noise management plan

#### **A comprehensive vibration management plan**

- Including details of works expected to cause vibration
- Details of the piling methods and extent of piling that will be required
- Details of proposed mitigation measures
- Details of proposed vibration monitoring (as detailed above for noise)
- I would suggest that the applicant has further regard to the contents of BS5228-2 and uses this as a basis for their vibration management plan

#### **Dust attenuation**

- Details of dust generating activities and/or equipment
- Details of dust attenuation measures and a commitment to ensuring such measures are fully implemented

### Potentially contaminated land

The potential for contaminated land was also previously considered within the submitted CEMP. Given the historic and current site uses to ensure that this risk is suitably controlled I would recommend that the phased contaminated land condition is applied to the consent.

### Noise

I have concerns regarding the potential for noise nuisance. The documentation provided gives consideration to the addition of mechanical ventilation being provided to the car parks. In addition, there is an electrical substation marked on the plans to ensure that the

potential for noise nuisance is controlled I would recommend a condition be applied to the consent.

To ensure that my concerns are addressed I recommend that the following 3 conditions are applied:

#### Construction Environmental Management Plan

- Prior to any demolition a Construction Environmental Management Plan (CEMP) shall be submitted to and approved in writing by the Authority. Agreed details shall be carried out as approved unless otherwise agreed in writing by the Authority. At a minimum the following should be included:
  - I. A scheme of how the contractors will liaise with local residents to ensure that residents are kept aware of site progress and how any complaints will be dealt with reviewed and recorded (including details of any considerate constructor or similar scheme)
  - II. A scheme of how the contractors will minimise complaints from neighbours regarding issues such as noise and dust management, vibration, site traffic and deliveries to and from the site
  - III. Details of hours of construction including all associated vehicular movements
  - IV. Details of the construction compound
  - V. A plan showing construction traffic routesThe construction shall be carried out in accordance with the approved CEMP.

#### Noise

- Noise associated with plant and machinery incorporated within the development shall be controlled such that the Rating Level, measured or calculated at 1-metre from the façade of the nearest existing noise sensitive premises, shall not exceed a level 5 dB(A) below the existing LA90 background noise level, including low frequency tones. Rating Level and existing background noise levels shall be determined as per the guidance provided in BS 4142:2014.

#### Potentially Contaminated Land Condition

- Please note this is one condition with multiple sub-sections:
  - (i) No works pursuant to this permission shall commence until there has been submitted to and approved in writing by Planning Services: (A desktop study shall be the very minimum standard accepted. Pending the results of the desk top study, the applicant may have to satisfy the requirements of b and c below, however, this will all be confirmed in writing).
    - (a) A desktop study documenting all the previous and existing land uses of the site and adjacent land in accordance with national guidance as set out in Contaminated land Research Report Nos. 2 and 3 and BS10175:2001 - Investigation of Potentially Contaminated Sites - Code of Practice;

and unless otherwise agreed in writing by Planning Services,

- (i) (b) a site investigation report documenting the ground conditions of the site and incorporating chemical and gas analysis identified as appropriate by the desk top study in accordance with BS10175;

and, unless otherwise agreed in writing by Planning Services,

- (i) (c) a detailed scheme for remedial works and measures to be undertaken to avoid risk from contaminants and/or gases when the site is developed and proposals for future maintenance and monitoring. Such scheme shall include nomination of a competent person to oversee the implementation of the works.

(ii) The development hereby permitted shall not be occupied or brought into use until there has been submitted to Planning Services verification by a competent person approved under the provisions of condition (i)(c) that any remediation scheme required and approved under the provisions of condition (i)(c) has been implemented fully in accordance with the approved details (unless varied with the written agreement of Planning Services in advance of implementation). Unless otherwise agreed in writing by the local planning authority such verification shall comprise:

- (ii) a) as built drawings of the implemented scheme;
- (ii) b) photographs of the remediation works in progress;
- (ii) c) certificates demonstrating that imported and/or material left in situ is free from contamination.

Thereafter the scheme shall be monitored and maintained in accordance with the scheme approved under condition (i) c.

#### Informatives/Advice Notes

The phased risk assessment should be carried out also in accordance with the procedural guidance and UK policy.

The site is known to be or suspected to be contaminated. Please be aware that the responsibility for the safe development and secure occupancy of the site rests with the developer.

It is strongly recommended that in submitting details in accordance with the above conditions that the applicant has reference to CLR 11, Model Procedures for the management of land contamination. This is available online as a pdf document from

[http://www.claire.co.uk/index.php?option=com\\_content&view=article&id=187&c](http://www.claire.co.uk/index.php?option=com_content&view=article&id=187&c)

atid=45&Itemid=256 with further information available at  
<https://www.gov.uk/guidance/land-contamination-risk-management>.

14 July 2021

I have reviewed the proposed plans for the development of 32 dwellings, 10 flats and 16 affordable houses which were received by post on 12<sup>th</sup> July 2021 and there are a number of issues of concern that I must raise.

Potential for disturbance during development

Whilst it is noted that a Construction Environmental Management Plan (CEMP) has been included I would have the following comments to make in relation to this document:

- The CEMP states that contractors will be expected to comply 'generally' with the requirements of BS 5228 parts 1 & 2. Further explanation should be provided to detail why there is a deviation from compliance with this British Standard.
- Confirmation and any details of piling works to be completed and specific measures that will be implemented whilst piling is taking place.
- The hours of noisy works should be included in the letter drop to residents.
- Due to the size and anticipated duration of the works it is strongly advised that the letter drop area be increased to include properties on Rue Des Monts, Close Des Jardiniers, Waters Rocque, Ruelle St Clair and further properties on Robergerie. In our experience people are much less likely to complain if they are aware of the works.

The CEMP is a working document and as such will need to be amended as the project progresses.

Potentially contaminated land

The potential for contaminated land is considered within the submitted CEMP. Given the historic and current site uses to ensure that this risk is suitably controlled I would recommend that the phased contaminated land condition is applied to the consent.

Noise

I have concerns regarding the potential for noise nuisance. The documentation provided gives consideration to the addition of mechanical ventilation being provided to the car parks. In addition, there is an electrical substation marked on the plans to ensure that the potential for noise nuisance is controlled I would recommend a condition be applied to the consent.

To ensure that my concerns are addressed I recommend that the following 3 conditions are applied:

### Construction Environmental Management Plan

- Prior to any demolition a Construction Environmental Management Plan (CEMP) shall be submitted to and approved in writing by the Authority. Agreed details shall be carried out as approved unless otherwise agreed in writing by the Authority. At a minimum the following should be included:

I. A scheme of how the contractors will liaise with local residents to ensure that residents are kept aware of site progress and how any complaints will be dealt with reviewed and recorded (including details of any considerate constructor or similar scheme)

II. A scheme of how the contractors will minimise complaints from neighbours regarding issues such as noise and dust management, vibration, site traffic and deliveries to and from the site

III. Details of hours of construction including all associated vehicular movements

IV. Details of the construction compound

V. A plan showing construction traffic routes

The construction shall be carried out in accordance with the approved CEMP.

### Noise

- Noise associated with plant and machinery incorporated within the development shall be controlled such that the Rating Level, measured or calculated at 1-metre from the façade of the nearest existing noise sensitive premises, shall not exceed a level 5 dB(A) below the existing LA90 background noise level, including low frequency tones. Rating Level and existing background noise levels shall be determined as per the guidance provided in BS 4142:2014.

### Potentially Contaminated Land Condition

- Please note this is one condition with multiple sub-sections:  
(i) No works pursuant to this permission shall commence until there has been submitted to and approved in writing by Planning Services: (A desktop study shall be the very minimum standard accepted. Pending the results of the desk top study, the applicant may have to satisfy the requirements of b and c below, however, this will all be confirmed in writing).

(i) (a) A desktop study documenting all the previous and existing land uses of the site and adjacent land in accordance with national guidance as set out in Contaminated land Research Report Nos. 2 and 3 and BS10175:2001 - Investigation of Potentially Contaminated Sites - Code of Practice;

and unless otherwise agreed in writing by Planning Services,

(i) (b) a site investigation report documenting the ground conditions of the site and incorporating chemical and gas analysis identified as appropriate by the desk top study in accordance with BS10175;

and, unless otherwise agreed in writing by Planning Services,

(i) (c) a detailed scheme for remedial works and measures to be undertaken to avoid risk from contaminants and/or gases when the site is developed and proposals for future maintenance and monitoring. Such scheme shall include nomination of a competent person to oversee the implementation of the works.

(ii) The development hereby permitted shall not be occupied or brought into use until there has been submitted to Planning Services verification by a competent person approved under the provisions of condition (i)c that any remediation scheme required and approved under the provisions of condition (i)c has been implemented fully in accordance with the approved details (unless varied with the written agreement of Planning Services in advance of implementation). Unless otherwise agreed in writing by the local planning authority such verification shall comprise:

- (ii) a) as built drawings of the implemented scheme;
- (ii) b) photographs of the remediation works in progress;
- (ii) c) certificates demonstrating that imported and/or material left in situ is free from contamination.

Thereafter the scheme shall be monitored and maintained in accordance with the scheme approved under condition (i) c.”

#### Informatives/Advice Notes

The phased risk assessment should be carried out also in accordance with the procedural guidance and UK policy.

The site is known to be or suspected to be contaminated. Please be aware that the responsibility for the safe development and secure occupancy of the site rests with the developer.

It is strongly recommended that in submitting details in accordance with the above conditions that the applicant has reference to CLR 11, Model Procedures for the management of land contamination. This is available online as a pdf document from [http://www.claire.co.uk/index.php?option=com\\_content&view=article&id=187&catid=45&Itemid=256](http://www.claire.co.uk/index.php?option=com_content&view=article&id=187&catid=45&Itemid=256) with further information available at <https://www.gov.uk/guidance/land-contamination-risk-management>.

Constables of St Sampson  
08 October 2019

On examining the documentation, it has come to our attention that this is an incomplete application so our letter of representation will be fairly brief at this time as well will have further material comments to make when all supporting documentation has been provided. We do feel this process is unreasonable as it requires a lot of time and effort and causes unnecessary anguish to many of our parishioners who are continually contacting us with their dissatisfaction with over development in this Parish.

Briefly, as mentioned above, we have concerns with the density of the development but again are finding it difficult to comment fully due to Phase 2 not being submitted at the same time. There will be 68 units of accommodation built in Phase 1 in a Conservation Area which seems far too many in such an area. When looking at the plans, the surrounding properties are considerably less in density with far more amenity space.

The above leads us on the rights of those parishioners to enjoy the amenities they have and we question how they are able to do so if the density is increased exponentially. It also raises fears for those who will actually live in the proposed development. It would appear they would be “crammed in” should the density remain as is.

We also have concerns with regards to traffic implications in the surrounding lanes. These are small lanes with school children walking and cycling to nearby schools. It is a regular occurrence that large vehicles use these lanes as a shortcut as well. We believe the density of what is proposed will have a huge impact on the increase of vehicles using these lanes and will compromise safety further in an already dangerous area so would breach Policy IP9. We would also like to see more information on the cumulative effect this development will have on neighbouring junctions.

30 July 2021

As a Douzaine, we understand the need for Guernsey to increase its housing stock and, to this end, some of this will be in our parish. However, this development raises concerns which been voiced to us by parishioners and these are concerns that must be addressed by the Planning Service and developers. As a Douzaine, we wish to register our concern; and the plans that have been submitted have allowed us to consider and comment as follows:

**The States of Guernsey Property Portfolio/Estate**

There is now general agreement within the States of Guernsey, including its politicians, that brownfield sites should be developed before sites such as this. The States of Guernsey is the largest owner of brownfield sites and there is also a significant amount of Government property lying empty which should be investigated before greenfield sites are decimated forever.

**Phase 1 & Phase 2**

The documents we have seen suggest that the phases are inextricably linked therefore without the consent from all landowners for both phases we are unable to see how the development can progress.

### **Infrastructure/Traffic**

The access roads to the site are on narrow roads/lanes and are unsuitable for any heavy traffic and especially large vehicles. The junction/exit roads to Route Militaire and the Vale Road are already fraught with issues relating to design, width and visibility. The current heavy use of Vale Road/Route Militaire, being the main arterial route from North to South, means exiting those junctions is difficult at current road usage levels.

The Traffic Impact Assessment commissioned by PF+A using ARUP is fundamentally flawed least of all because it is difficult to understand for the layman but also because of the conditions at the time it was undertaken i.e., not at peak time when the roads are under most pressure, not in poor weather when car usage increases, not when schools were open which increases volume.

It also omits other developments which are either in progression or approved development frameworks in the area all of which have a cumulative effect on traffic in the area;

- Le Four Banal where density of dwellings is suggested as 25-35 per hectare (this site is 0.95 hectares)
- Les Bas Courtils where there is a pending planning application for 13 dwellings
- Les Bas Courtils & Fleur de Lys where there is a pending planning application for 17 dwellings
- Braye Road Industrial Estate where a development framework was approved in June 2021 for industrial units falling within class 24 and Use Class 22
- Domarie & Avondale Vineries where permission has been granted for change of use to form 16 storage units and 2 open yards
- Oatlands Village where a nursery is soon to be finalised catering for 52 children where there could potentially be 104 extra car journeys each week day, many of them egressing onto Route Militaire

Therefore the Douzaine do not feel this report is accurate and hides a multitude of issues that will arise for the Islanders of the North end of the Island.

### **Public Transport**

This area is poorly served by public transport therefore this only increases car usage and will add to the volume of vehicles.

### **Health and Safety**

This area has no footpaths which already puts pedestrians at risk. It is reported by Parishioners that they currently have to drive their children to school or drive to Delancey Park rather than walk as they do not feel safe using both Robergerie Road or Pointues Rocques. This development will make conditions worse and will not encourage people to walk or cycle. Any residents with mobility issues will be isolated in their properties/estate without safe access to bus routes so will need to use cars for transport. There are no easily accessible shops or amenities from this site adding to the need for transport.

### **Allocated Parking**

The parking arrangements are inadequate for the size of the development and we foresee that an already crowded area, for parking, will lead to continued road parking and frustrations for the existing residents who currently lack parking places. The decision to provide on road parking along Pointues Rocques by moving a wall will not address the issues.

### **Surface Water Run Off**

We have considered the section of the plans relating to waste water. The concerns we have relate to surface water and we do not consider that the various plans on the topic of Swales and surface water will deal with the bigger problem. The Swales shown by the Robergerie entrance/exit are not big enough to deal with the amount of water that runs from this site and climate change will only increase the volume. Indeed 2020 has been reported as being the wettest year since 2000 in the UK with rainfall 16% above average. 2021 thus far has seen much rain and this year's volume could well exceed that of 2020. Neighbouring properties are likely to be adversely affected by the expected increase in surface water run off should the development go ahead. As the parish Douzaine, we have knowledge accumulated over many years of the hidden underground culverts leading down from Pointues Rocques and feed in to the douits and stream network and believe, without question, that they will not cope with any additional volume of water. We are already aware of water running from this site into neighbouring gardens on the west side and whilst we note there is some provision for tanking on this boundary wall, we doubt that this goes far enough to remediate the problem and the very real concerns of parishioners in that area. We do not accept that Section 19.10.5 (Policy GP9) of the IDP relating to flood risk has been adequately addressed.

### **Environment**

This site is an area containing critically endangered habitat as identified by a report completed in 2019 by Biodiversity Officer, Julia Henney. This report was given to the developers and we are unable to see, on the plans, where any of her suggestions or concerns have been adequately addressed. This is of particular sadness and concern for the parish as a whole and suggests that Planning is paying "lip service" to the clear wording of the report by Julia Henney and her reference to the Animal Welfare Ordinance (2012). Surveys should have been completed and presented as part of this application.

The site also has points of historical interest including a dry-stone wall and cobbled pathway circa pre-1700's, Victorian granite boundary walls and vinery buildings. This is Guernsey history being lost and a clear breach of IDP Policy GP4 relating to conservation features.

### **Well-Being of the Community**

The proposals for this site are causing anxieties for neighbours and St Sampson's parishioners. The development will cause huge disruption for the area in terms of heavy goods traffic, dust/dirt and noise. A change to a much-loved environment and concerns about an already overcrowded area is apparent and needs addressing. We are not aware of any consideration having been given to privacy and suggest that site poles be erected

so people can see how much of their privacy will be lost. This is the least that should be done before any further steps are taken.

### **Conclusion**

The Douzaine:

- Objects to the number of dwellings proposed on a site with such access issues.
- Considers phase 1 and phase 2 should be considered as one proposal.
- Disagrees with the Traffic Impact Assessment and insists that an independent report should have been commissioned by the States of Guernsey.
- Has concerns about the potential social impact of this development.
- Has serious concerns about pedestrian safety.
- Has concerns about damage to surrounding properties from water drainage/flooding.
- Objects to the loss of a conservation site, habitat, ecological features without any plan for preservation or translocation of wildlife.
- Requests the erection of site poles prior to any further planning meetings.

### **Further Analysis**

This site will not address the housing crisis in Guernsey. The proposed private houses are not for first time buyers and the Guernsey Housing Association properties will not be suitable for people with disabilities or mobility issues, or indeed the ageing demographic because of the surrounding area; these were the priorities highlighted in the Government Work Plan and other current work streams.

Housing officers have been in discussion with the landowners of this site to secure the land for affordable housing development by virtue of Policy GP11 of the Island Development Plan. The Committee *for* Employment and Social Security has been kept updated on the outcome of discussions with landowners over the past few years and, in particular, on the provision of affordable housing that could be secured via Policy GP11.

In response to the landowners' initial application for planning permission, and your subsequent letter dated 29 August 2017, the Committee *for* Employment and Social Security confirmed that when taking into account the current social rental waiting lists, the partial ownership waiting lists and the current housing requirement data, it was satisfied that the proposed ratio of unit sizes for both the affordable housing units and private market housing units met the Island's housing requirements at this time.

In considering the affordable housing units put forward under the 2019 planning application, Housing officers have advised the Pointues Rocques landowners of its requirement for a ratio of 75% one bed units and 25% two bed units. This is based on the latest data and analysis of current social rental housing waiting lists, partial ownership waiting lists and the housing requirement predictions made in the 2017 KPMG Local Market Housing Review Report. Housing is content that the affordable housing units provided for in this planning application meet this requirement.

However, it is noted that the proposed application has made provision for 13 affordable housing units which, following discussion with landowners, is understood to be located on approximately 15% of the developable land area being put forward; this is the percentage of developable land to be made available for the development of affordable housing required under Policy GP11 in Year 1 of the transition period.

Housing notes that the revised application for planning permission has been submitted in Year 3 of the transition period and that, to date, permission is yet to be granted. While it remains a point of clarity for Planning to determine in the application of Policy GP11, should the affordable housing requirement need to be increased to meet the higher land percentage requirements as set out by Policy GP11, Housing will continue discussions with landowners to make provision for the increased land area required for the development of affordable housing.

In relation to the provision of the private market housing, at present, the best data available remains the 2017 KPMG Report housing requirement figures. In comparing the development's proposed unit sizes for this tenure with the KPMG housing requirement predictions, Housing notes that there is an under provision of three bedroom properties and an over provision of one and two bedroom properties. However, it is noted that when the original planning application was submitted (2017) it was done so based on the 2011 Housing Needs Study housing requirements because the KPMG report was not yet published and it is assumed that these ratios have been carried forward into the amended planning application.

