

# **REPORT OF THE CONSULTATION RESPONSES TO THE CAMP DOLENT DRAFT DEVELOPMENT FRAMEWORK**

## **Introduction**

A Draft Development Framework was prepared by the Planning Service for a potential residential development at Camp Dolent, Tertre Lane in the parish of Vale.

The Draft Development Framework was prepared to provide planning guidance on how the site might be developed. The site is currently an agricultural field and is located in the St Sampson/Vale Main Centre Outer Area. It is not designated as Important Open Land. Residential development is therefore supported in principle. The site covers an area of approximately 0.27 hectares (1.65 verges). A Development Framework was required for this site in accordance with Policy MC2 (Housing in Main Centres and Main Centre Outer Areas) as the site area exceeds 0.25 hectares (1.5 verges).

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

The Draft Framework was subject of a four week public consultation which closed on the 6<sup>th</sup> April 2018. The public were invited to make comment via a press release and media coverage in the Guernsey Press. The document was placed on the States website in addition to being available in Sir Charles Frossard House. During this period, 26 comments were received from the public, comments were received from Deputies Laurie Queripel and Matt Fallaize on behalf of parishioners, and there was consultation with several States Committees/Agencies and the Constables of St Sampson and the Vale parishes, although the Constables of both Parishes did not make comments.

The concerns expressed during the consultation period principally relate to:

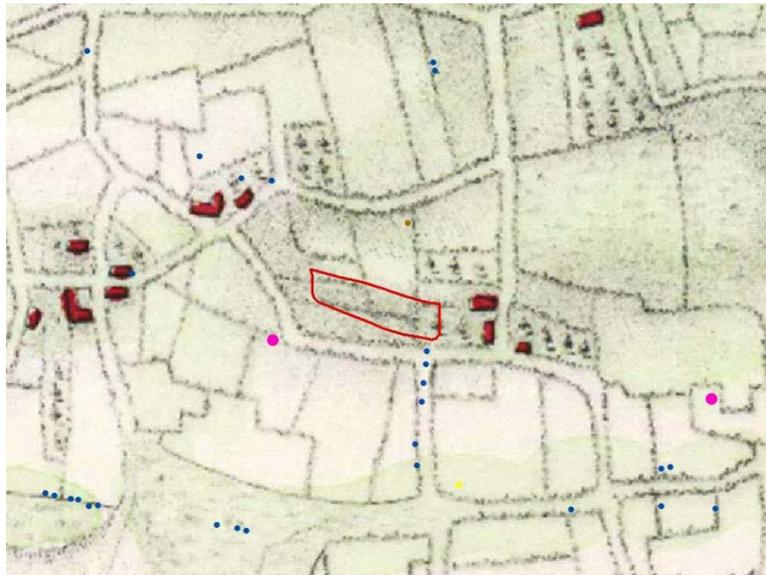
- The principle of developing undeveloped land/open green space and the need for new housing;
- Housing density;
- Traffic and parking issues - including cumulative impact considering other planned developments in the area;
- Pedestrian access and safety;
- Impact on the amenities, health and wellbeing of existing residents;
- Capacity of nearby schools to accommodate additional pupils;
- Flooding issues; and
- Scale and character of development.

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

### **States Committees**

#### **Education, Sport and Culture - Archaeology**

The field can be identified on the Duke of Richmond map of 1787; its present boundaries are unchanged (see image below). There is no known archaeology on the site, although there are records of two prehistoric stone axes found relatively nearby (represented by pink dots on the image).



Camp Dolent on the 1787 Duke of Richmond map, with the modern boundary shown in red. The 1787 map is slightly inaccurate, hence the disparity in location.

In view of the lack of known archaeology on the site it would be useful if a resistivity survey could be carried out prior to development, which in turn might reveal features which could be targeted with archaeological test-pits. Resistivity survey can now be carried out by our department, utilizing equipment belonging to La Société Guernesiaise. Surveying this field would be a quick and convenient method of assessing its archaeological potential, prior to digging test-pits which necessarily take more time and effort.

#### **Officer Response**

*Although there is no known archaeology on the site, due to the recording of two prehistoric finds relatively nearby it is agreed that providing access to the site to enable its investigation with a resistivity survey prior to the development of the site should be encouraged.*

**Recommendation:**

That paragraph 6.2 of the 'Protected Buildings, Protected Monuments and Protected Trees' section is amended as follows:-

'There are no Protected Monuments or Protected Trees in the immediate area. There are no archaeological find-spots or archaeological sites within the site although there are records of two prehistoric stone axes found relatively nearby.

And the following paragraph is added to the 'Development Guidelines' section after paragraph 9.13:-

'Due to the recording of two prehistoric finds relatively nearby, it is desirable that access be granted to the States Archaeologist, Culture & Heritage Service, to undertake a resistivity survey prior to development, which in turn might reveal features which could be targeted with archaeological test-pits'.

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

I have reviewed the proposed development information for Camp Dolent, Tertre Lane, Vale, which was received by email on 12<sup>th</sup> March 2018 and I do not have any comment on the proposals.

**Officer Response**

*Comments Noted.*

**Traffic and Highway Services**

I have had a read through the Draft Framework and it broadly reflects the content of my e-mail to you of 1<sup>st</sup> November last year on the traffic side of things.

I have discussed the comments on the public transport links with my colleagues in that area and they felt the framework accurately describes provision of services except for the P2 route which serves the spine of the Island as well as the north (Capelles, Camp du Roi, Landes du Marche etc.). Not a major issue but worth consideration if the brief is updated following consideration of comments. Aside from that, all good in terms of identifying opportunities and constraints on the traffic side.

**Officer Response**

*It is agreed to revise paragraph 5.4 to provide a more complete description of bus routes available in the area.*

**Recommendation:**

That paragraph 5.4 of the 'Local Roads' section is amended as follows:-

'Very good public transport links serve the area, with bus routes along Route des Coutures, La Route Du Braye and Vale Avenue, connecting the site to the north of the Island, the Bridge, St Peter Port, the around Island routes and the P2 route'.

**Public Agencies****Guernsey Fire and Rescue Service**

Thank you for your consultation reference the Camp Dolent Draft Development Framework. I am happy to report that the Fire Service would support the proposed development of this area.

The only comments I wish to have recorded is that if the existing access to the site, via Tertre Lane, is to be used as the main entrance/exit for the new development, this entrance/exit point would have to be widened to ensure that a Fire Service vehicle approaching the site from the Route des Coutures – Tertre Lane route, could turn right the 90-120 degrees and easily access the proposed site.

Please also note that the Fire Service would not require a new fire hydrant in the proposed site as the area is already well covered by two existing fire hydrants. For your future reference the two nearest fire hydrants to this development site are: Fire Hydrant Asset Numbers 25628 & 69139.

**Officer Response**

*With regards to the use of the existing access, the Draft Framework highlights that the existing vehicular access is not suitable for a residential development of the scale proposed and it is intended that a new access/accesses will be created to serve the development.*

**La Société Guernesaise**

Apologies for the delay in getting a response to you regarding this development framework. Hopefully some/all of our comments can be considered for this document.

We would like to firstly highlight that the developable area was Arable Agricultural land according to both the 1999 and 2010 Habitat Surveys. However, since these surveys, the land may not have been farmed as the photos appear to show a developing 'permanent' grassland habitat which is not intensively managed and may therefore be relatively diverse in terms of species richness. Species-rich grassland habitats are in long term decline across

the island and continue to face numerous threats such as intensive farming, overgrazing by horses, encroachment by scrub and extensions to curtilage. In drawing up the Development Framework, we would ask for consideration to be given to options which allow for the area to be surveyed ahead of any development and that based on those findings, proposals seek to retain as much of the grassland as possible. This could be achieved by making the area a community/urban nature reserve or simply by reducing the extent of the agreed developable land.

In terms of other aspects, we would recommend that future proposals on the wider site incorporate ample green space and any planting include a significant proportion of native trees and shrubs. In line with our comments on other DFs, we would suggest the following core planting list -

(Trees) Common Ash, Silver Birch, Common Alder, English Oak, Scots Pine, Rowan, Field Maple, fruit trees.

(Hedging) Elder, Hawthorn, Holly, Grey Willow.

As part of any new development, it would be beneficial to include suitable bird and bat boxes within the design to allow bats to roost and birds such as Swifts, House Martins, House Sparrows and more common species to nest.

We look forward to seeing the draft framework in due course.

**Officer Response**

*It is suggested that if the land is not being intensively managed there may be a possibility that it is developing a permanent grassland habitat which may be relatively diverse in terms of species richness. However, even if this was the case, the land is not designated as an Area of Biodiversity Importance or a Site of Special Significance and if the land was surveyed, it is highly unlikely that it would be of such importance from a biodiversity perspective to merit any particular protection.*

*It is agreed that any planting should include a significant proportion of native trees and shrubs and it would be beneficial to include bird and bat boxes.*

**Recommendation:**

That paragraph 9.21 of the 'Development Guidelines' section is amended as follows:-

'A full landscaping scheme should be prepared and submitted as part of any proposal in order to supplement the existing planting and enhance the development. This scheme should also consider opportunities to increase the biodiversity on the site. Tree and hedge planting should use species appropriate to the site's location. Suitable tree species could include Common Ash, Silver Birch, Common Alder, English Oak, Scots Pine, Rowan, Field Maple and fruit trees; suitable hedge species could include Elder, Hawthorn, Holly and Grey Willow. Preservation and enhancement to the general outlook of the surrounding areas will be key to the landscaping proposals of this development'.

And the following paragraph is added to the 'Development Guidelines' section after paragraph 9.21:-

'It would be beneficial to include suitable bird and bat boxes within the design to allow bats to roost and birds such as Swifts, House Martins, House Sparrows and more common species to nest'.

**Public Comments**

The consultation period resulted in 26 comments from the public, with two members of the public providing two separate comments. In addition comments were received from Deputies Laurie Queripel and Matt Fallaize on behalf of parishioners. The main issues raised by the public are summarised as follows:

**Officer Response**

***The principle of developing undeveloped land/open green space and the need for new housing.***

*A number of respondents have raised concerns about the principle of developing undeveloped land and the lack of need for new housing. Reference is made to recently built and vacant housing in the area; sites which have been approved for housing but have not been built, for example at Leale's Yard and a development for 51 sheltered housing units to the north of La Route Du Braye; and it is stated that brownfield land should be developed before undeveloped land/open green space.*

*During the preparation of the Island Development Plan, the site was surveyed to determine whether it should be designated as Important Open Land (Survey of 'Important Open Land' in Proposed Main Centres and Local Centres, October 2014). The assessment concluded that*

*although the field provides amenity for neighbouring properties it does not form part of a wider landscape setting and the land was not designated as Important Open Land.*

*As set out in Policy MC2 (Housing in Main Centres and Main Centre Outer Areas), the majority of the Island's housing supply is to be provided within and around the Main Centres. The site is located in a Main Centre Outer Area and does not form Important Open Land. As such Policy MC2 supports the development of the site for housing where it accords with all other relevant policies of the Island Development Plan and where able to the site provides an appropriate mix and type of dwellings.*

*Any changes in the overall housing need would be assessed as part of a strategic review of the Island Development Plan and is not an issue to be addressed in any individual Development Framework or planning application. As such, the number of houses approved but not constructed, recently built and vacant in the area is not material to this Development Framework.*

*There is no requirement in the Island Development Plan for brownfield land to be developed prior to undeveloped land within the Main Centre Outer Areas. In addition, as suggested by one respondent, there is no provision to require the clearance of redundant glasshouse sites elsewhere to compensate for the loss of this undeveloped land. However, it is noted that the overall spatial strategy of the Island Development Plan to concentrate development within and around the edges of the urban centres of St Peter Port and St Sampson/Vale with some limited development within and around the edges of the other main parish or local centres seeks to restrain the development of undeveloped land across the Island whilst providing sufficient space to meet legitimate development requirements.*

*Reference is made to an application which was refused to erect three dwellings on a field along Tertre Lane to the west. The application was refused in May 2009 under different policies contained in the former Urban Area Plan (PAPP/2009/0248).*

### **Housing density**

*A number of respondents have raised concerns over the proposed density of this site, the overdevelopment of the area and the resulting impacts on the surrounding area.*

*The Draft Framework gives an indicative density range of 30-65 dwellings per hectare, which equates to approximately 8-17 dwellings on this site.*

*The density of development should take into account the scale that is appropriate to the surrounding area and to the specific site and development is required to meet the requirements of planning policies as set out in the Island Development Plan, which includes both demonstrating the most effective and efficient use of land, but also requires that*

*development respects the character of the local built environment (Policy GP8: Design). The Draft Framework already considers the character of the area in some detail (sections 4, 5 and 6) which adequately establishes the context for development of this site. The site is situated in a Main Centre Outer Area with good transport links to the site and where development sites are expected to achieve a higher density of development.*

*For the purposes of comparison, the recently approved Development Framework for Cleveleys Vinery along La Route Du Braye proposed a density range of 25-35 dwellings per hectare. However, the Camp Dolent site is located closer to the Bridge Main Centre and includes higher density development within the immediate area and therefore it is considered that the Camp Dolent site has the potential to be developed at a higher density.*

*An additional element relating to density and housing numbers is the mix and type of housing proposed. The exact mix and type of dwellings will be determined at the point of any planning application on the site, informed by the most up to date information available such as Housing Needs Surveys and other relevant information held by the States of Guernsey, and reflective of the demographic profile of households requiring housing. For the site to be developed at the higher end of the density range whilst still maintaining visual access to the undeveloped landscape to the north and respecting the transitional nature of the site between the built up urban environment of the Bridge to the south and the more sparsely developed rural landscape to the north, it is likely that a development of solely small flats or apartments would be required. However, current evidence suggests a need for smaller units, including smaller family homes (2-3 bedrooms), as well as one bedroom homes. This form of development could not be achieved on the site at the higher end of the density range proposed in the Draft Framework.*

*It is therefore recommended that the density range for the site is reduced to 30-45 dwellings per hectare, which equates to approximately 8-12 dwellings on this site. This reduced density range is felt to provide a more appropriate balance to the requirements of policy having regard to the constraints of the site and the most up to date information regarding housing need. However, the exact number of units could be higher or lower and will depend on the detailed design response to the specifics of the site, which will be assessed on merit based on the relevant policies of the Island Development Plan as part of the consideration of a detailed planning application.*

**Recommendation:**

That the last sentence in paragraph 9.4 of the 'Development Guidelines' section is amended as follows:-

'For the site in question, it is anticipated the site would be able to accommodate a density range of 30-45 dwellings per hectare, which is approximately 8-12 dwellings on this site'.

***Traffic and parking issues - including cumulative impact considering other planned developments in the area***

*A number of respondents refer to traffic and parking issues including referring to other planned developments nearby, such as at Leale's Yard and the development for 51 sheltered housing units to the north of La Route Du Braye, and the cumulative impact that all of the development in the surrounding area could have on traffic movements and public parking.*

*Constraints with the existing road network, particularly along Tertre Lane, and the need for the road network to be able to cope with the development are highlighted in the Draft Framework. Traffic generated from the site and its impact on the surrounding road network in terms of traffic management and road safety would be assessed further at the detailed planning application stage in consultation with Traffic and Highway Services.*

*The Draft Framework requires appropriate levels of parking to be provided and notes that it is expected that the provision of parking should comply with the Supplementary Planning Guidance: Parking Standards and Traffic Impact Assessment. To date, Traffic and Highway Services have not raised objections to the proposed indicative development of the site. Any planning application submitted on the site will be the subject of consultation with Traffic and Highway Services and traffic and parking issues will be fully considered.*

***Pedestrian access and safety***

*Respondents raise concerns about pedestrian safety in the area in general and specifically along Tertre Lane. The Draft Framework acknowledges issues with pedestrian safety along Tertre Lane and seeks to enhance this, if the site accesses onto Tertre Lane, by creating a footpath as part of the development of this site. Although there are issues with crossing some specific junctions or roads in the area, once onto Route des Coutures, pedestrian access in the area is generally good with pedestrian footpaths along the main roads.*

*Pedestrian access/egress to and from the site and pedestrian safety along the adjacent highways will be assessed further at the detailed planning application stage in consultation with the Traffic and Highway Services and Building Control where necessary.*

### ***Impact on the amenities, health and wellbeing of existing residents***

*Respondents express concerns about the impact of the development on the amenities, health and wellbeing of existing residents, including the loss of open green space and the urbanisation of the area and the potential for overlooking.*

*The Draft Framework highlights the need for development to have regard to neighbouring properties, including properties to the south and west of Tertre Lane, through the identification of 'Residential amenity to be considered' areas along neighbouring residential boundaries and by setting back the 'Potential Developable Area' (see image 14: Development Guidelines).*

*Although the field provides amenity for neighbouring properties, the site is not physically accessible to the public and the loss of the open space from a visually accessible perspective would not have an undue urbanising effect on the area and would have no material adverse effects on the amenities, health and wellbeing of existing residents.*

*Any development would need to accord with Policy GP8 (Design) which, inter alia, requires new development to consider the health and well-being of the occupiers and neighbours of the development by means of providing adequate daylight, sunlight and private/communal open space; and Policy GP9 (Sustainable Development) which, inter alia, supports development that will not have unacceptable impacts on the amenities of neighbouring properties. The likely effect of the development on the reasonable enjoyment of neighbouring properties is also a material planning consideration as detailed in Part IV, section 13, of The Land Planning and Development (General Provisions) Ordinance, 2007.*

### ***Capacity of nearby schools to accommodate additional pupils***

*A number of comments are made about the ability of nearby schools to be able to cope due to the demand from additional housing in the area. Although the Committee for Education, Sport and Culture was not consulted specifically on this Draft Framework, no objections were raised to the spatial strategy in relation to school capacity as part of the extensive consultations undertaken for the Island Development Plan. There will be continued liaison with the Committee for Education, Sport and Culture as and when necessary in relation to housing and school capacity.*

### ***Flooding issues***

*Respondents have raised concerns with regard to flood risk at the southern end of Route des Coutures/along Summerfield Road and a respondent raises concerns about the development causing flooding of their property.*

*Although there are no known issues with flooding of the site or the immediate area, it is acknowledged that there is a flood risk at the southern end of Route des Coutures/along*

*Summerfield Road. In order to comply with Policy GP9 (Sustainable Development), drainage solutions will need to form part of development proposals, and should include Sustainable Urban Drainage systems (such as permeable paving in landscaping schemes). The Draft Framework refers to the use of Sustainable Urban Drainage systems to control surface water run-off from the site under the 'Development Guidelines' section paragraph 9.11 but it is recommended that the wording of the Draft Framework is revised to emphasise the need to manage and control surface water run-off from the site.*

**Recommendation:**

That paragraph 4.8 of the 'Surrounding Area' section is amended as follows:-

'There is no risk of flooding identified at the site or immediate area but there is a risk of flooding at the southern end of Route des Coutures/along Summerfield Road'.

And that paragraph 9.11 of the 'Development Guidelines' section is amended as follows:-

'Surface water drainage must be dealt with on site to reduce the flood risk to properties at the southern end of Route des Coutures/along Summerfield Road. Sustainable Urban Drainage (SUDs) systems should be incorporated to ensure that surface water run-off from the site is properly managed and controlled (Policy GP9)'.

**Scale and character of development**

*Respondents raise concerns about the elevated nature of the site and the scale and bulk of the development if it exceeds one or one and a half storeys.*

*Policy GP8 (Design) encourages the use of multi-storey designs to make the most effective and efficient use of land. Restricting the development to one and a half storeys may not represent an effective and efficient use of land. The Draft Framework acknowledges the raised nature of the site and advises that consideration should be given to the potential to adjust and reduce the existing site levels to ensure the most effective and efficient use of the site.*

*The properties adjacent to Tertre Lane within La Courtil de Fontaine have the appearance of one and three quarter or two storeys in height and there are a number of two and two and a half storey properties within the area. Although care is required regarding the scale, siting and design of buildings on the site, there is no apparent reason why the development should be restricted to one and a half storeys. The Draft Framework sets out that new dwellings will be expected to respect the form, bulk and massing in the vicinity and be in the range of one and a half to two and a half storeys and this remains appropriate for this site. However, it is*

*agreed to revise the wording of the Draft Framework to provide further clarification regarding the proposed range in building heights.*

*Respondents highlight the importance of the existing boundary granite walls to the character of the area. The Draft Framework acknowledges that the existing granite walls are characteristic of the area. However, new openings within the walls will be required to provide access/accesses to the site and there are good pedestrian safety grounds to allow for the realignment of the walls to create a public footpath. As a result, alterations to the granite walls will be required to enable the development of the site but it is envisaged that alterations could be made to the walls whilst still preserving the landscape character of the area. This would be assessed further at the detailed planning application, having regard to Policies GP1 (Landscape Character and Open Land) and IP9 (Highway Safety, Accessibility and Capacity).*

**Recommendation:**

That the last sentence of paragraph 9.2 of the 'Development Guidelines' section is amended as follows:-

'New dwellings will be expected to respect the form, bulk and massing in the vicinity and having regard to the constraints of the site by virtue of its location and topography, new dwellings should be in the range of one and a half to two and a half storeys'.

**Additional amendments**

A number of minor corrections/amendments including the labelling of diagrams are recommended as detailed below:

- Swap image 3 and image 6 to improve clarity of layout.
- Images renumbered (no image 4 in document).
- Location of bus stops revised on image 7.
- Label for 'Residential amenity to be considered' added to image 13.
- Storey heights revised on image 13.
- Protected Buildings heading above paragraph 9.13 in the 'Development Guidelines' section revised to 'Protected Buildings and archaeology'.
- Position of label for 'Indicative Developable Area' on image 14 adjusted.
- Link to website updated on page 16.

## **Summary**

The consultation process in respect of the Draft Development Framework has elicited a considerable number of responses covering a range of planning and highway issues. The Authority will need to carefully consider the representations, together with the Officer responses and recommendations, before finalising a Development Framework for the Camp Dolent site. Once finalised, the Development Framework will provide a valuable supplementary policy context for determining any subsequent planning application(s) for the site.