

## **REPORT OF THE CONSULTATION RESPONSES TO THE BRIARWOOD DRAFT DEVELOPMENT FRAMEWORK**

### **Introduction**

A Draft Development Framework was prepared by the Planning Service for a potential residential development at Briarwood, La Grande Rue, St Martin. A Framework was required for this site in accordance with Policy LC2: Housing in Local Centres as the site area exceeds 0.125 hectares (0.75 vergées). The purpose of the 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 site covers an area of approximately 1 hectare (6.1 vergées) and is occupied by the Health Services building at Briarwood, a dwelling known as Les Blanches Pierres, the attached hairdressers known as Envy, the St Martin's public car park and the adjacent field. The developable area of the site as proposed however excludes the Health Services building, the dwelling at Les Blanches Pierres and the hairdressers. The Draft Development Framework has been prepared to provide planning guidance on how the site might be developed for residential purposes, but also highlights potential for improvements to the public car park, pedestrian network and access points along La Grande Rue.

A full planning policy context is set out within Appendix 1 of the Draft Development Framework.

Prior to preparation of the Framework, initial consultation was undertaken with the States Archaeologist, Traffic & Highway Services, Guernsey Roads, States Property Services, Education Services, Guernsey Police, Guernsey Fire, La Société Guernesiaise, the Constables of St Martin, the Community Plan Group for St Martin and the utility companies. The responses received informed the preparation of the Framework.

The Draft Framework was the subject of a six week public consultation which closed on the 1<sup>st</sup> June 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 and at the Constables office in St Martins. During this period, seven comments were received from the public, and there was consultation with several States Committees and Public Agencies, including the Constables of St Martin parish.

The concerns expressed during the consultation period principally relate to:

- Principle of additional housing in this area;
- Potential to develop alternative brownfield sites for housing/loss of open agricultural land;
- Potential to develop site for additional community facilities;
- Density and mix of housing;
- Capacity of St Martin's School;
- Sensitivity of the school premises;
- Residential amenity;

- Traffic & Highway issues;
- Importance of the public car park;
- Provision of adequate private car parking;
- Contaminated land;
- Impact on surface and ground water;
- Impact on wildlife.

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

### **States Committees**

#### **Guernsey Roads**

Asks for a definition or footnote to be added to define the car park's status. Potentially a footnote on pg. 3 or a definition at the back along the lines of:

*'Public Car Park' –the term refers to the land owned by the States of Guernsey currently made available to the public for parking, which is not part of the public highway.'*

The simple addition of a definition along those lines will hopefully ensure that it is clear that access by the adjoining land owners to get to the highway is not a given right; and also reinforce that the onus of responsibility to provide public parking spaces does not rest with the SoG alone and the four land owners will have to work jointly to meet whatever the planning requirements are with respect to the provision of public parking that is needed to maintain the viability of the local centre.

#### **Officer Response**

Agreed.

#### **Recommendation:**

Add footnote to page 3 linked to paragraph 2.1:

*Public Car Park - the term refers to the land owned by the States of Guernsey currently made available to the public for parking. The land does not form part of the public highway.*

#### **Education Services**

We have no objections to the proposed development but would ask that:

- The treatment/planting scheme of the boundary adjacent to St. Martin's Primary School be considered, with a view to minimising oversight of the school; and
- the extent to which St. Martin's Primary school is overlooked by nearby properties be minimised.

### **Officer Response**

The sensitivity of the boundary with the adjacent school premises is highlighted in the Site Analysis (Paragraph 8.12) and the Development Guidelines note that *“development proposals must respect the amenity of neighbouring residents and the sensitivities of the adjacent school”* (Paragraph 9.11).

It is however agreed that the sensitivity of the boundary could also be highlighted within the section relating to Landscape Design (Paragraph 9.26).

#### **Recommendation:**

That paragraph 9.26 is amended to read as following:

A comprehensive landscaping scheme must be submitted as part of any proposal which should respect the local character, mitigate against the impact of development, particularly in views from the pedestrian network, and improve the landscape character and biodiversity. The scheme should also respect and enhance the level of discretion required for the users of the public health building at Briarwood *and the sensitivities of the adjacent school premises*, and maintain the amenity of the adjacent residential properties.

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

I have reviewed the draft development framework produced in relation to the above site. I can confirm that should an application be made for this site this office would be likely to recommend that a phased contaminated land condition be attached to the consent.

Conditions related to a Waste Management Plan and Construction Environmental Management Plan would also be likely to be recommended.

### **Officer Response**

Following verbal consultation, it has been confirmed that the potential contamination relates to the field to the north-west of the site, which was formerly under glass. It is agreed that the concerns regarding the potentially contaminated land should be included in the Framework.

The requirements for a Site Waste Management Plan and Construction Environmental Management Plan are set out within Section 10 of the Framework.

**Recommendation:**

That the following is inserted after the first sentence of paragraph 7.5:

*That field was previously under glass and there may be residual contamination of the land.*

That the heading Paragraph 8.14 is amended to “Landscape and Environment” and a new paragraph is added stating:

*8.15 The field to the north-west of the site was formerly under glass and as such this could give rise to potential contamination.*

And the following paragraph is added to the ‘Development Guidelines’ section after paragraph 9.20:

*Contaminated land*

*9.21 Given the previous horticultural use of the field to the north-west of the site, the potential for contaminated land would need to be investigated.*

**Traffic and Highway Services**

No response has been received from Traffic & Highway Services.

**Officer Response**

Traffic & Highway Services were consulted prior to preparation of the Draft Framework and provided a detailed response at that time, which has formed the basis of the sections relating to traffic management, access and parking provision.

**Archaeology**

We have no further comments to make on the archaeological aspects, which are well covered in the document as it stands.

**Officer Response**

Comments noted.

**Guernsey Waste**

From a waste management perspective it is good to see section 10 dedicated to this, and I have a few suggested additions to this section, in bold as follows:

10.2. Site Waste Management Plans apply to all aspects of a project, with the majority of opportunities for waste minimisation existing at the design phase. Information should be provided with a planning application on the amount and type of waste that will be produced

during the course of a project and how waste will be reduced, reused, recycled, recovered or disposed of, **including the amount and type of waste that may be reused or recycled on-site**. This should be by means of a living document, drafted up from the conception of a project and being added to and evaluated until the completion of the development, and submitted again to the Authority **with final figures for the project** prior to occupation or use of any dwelling on the site.

10.3. All materials from the demolition of the existing buildings will be carefully sorted, separated, and distributed accordingly through the appropriate routes for recycling, recovery or disposal, in order to minimise the waste produced. **[It might be useful to include something in here to encourage reuse/recycling on-site where appropriate ahead of distributing to alternative routes].**

10.4. The final design will incorporate dedicated waste and recycling storage provision on the site suitable to the density of the site, **and appropriate for new waste and recycling collections commencing from 2 September 2018.**

**Is it appropriate for the CEMP and traffic management (sections 10.5 and 10.6) to be included under the heading Site Waste Management Plan?**

**Officer Response**

Proposed amendments to paragraphs 10.2-10.4 are agreed.

It is agreed that the requirements for a Construction Environmental Management Plan would be more explicit if that information sat below a separate heading.

**Recommendation:**

Section 10 be amended as follows:

10.2. Site Waste Management Plans apply to all aspects of a project, with the majority of opportunities for waste minimisation existing at the design phase. Information should be provided with a planning application on the amount and type of waste that will be produced during the course of a project and how waste will be reduced, reused, recycled, recovered or disposed of, *including the amount and type of waste that may be reused or recycled on-site*. This should be by means of a living document, drafted up from the conception of a project and being added to and evaluated until the completion of the development, and submitted again to the Authority *with final figures for the project* prior to occupation or use of any dwelling on the site.

10.3. All materials from the demolition of the existing buildings will be carefully sorted, separated, and, *where possible, re-used on site. Alternatively the sorted materials should be* distributed accordingly through the appropriate routes for recycling, recovery or disposal, in order to minimise the waste produced.

10.4. The final design will incorporate dedicated waste and recycling storage provision on the site suitable to the density of the site, *and appropriate for new waste and recycling collections commencing from 2 September 2018*.

Paragraphs 10.5 & 10.6 be altered to Paragraphs 11.1 & 11.2 under section heading '11. Construction Environmental Management Plan'.

Section 11 be amended to section 12 Environmental Impact Assessment.

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

Thank you for consulting with the Guernsey Fire & Rescue Service reference your latest draft development framework for Briarwood, La Grande Rue. I am pleased to report that the Fire Service would not object to this proposed development.

The Fire Service would certainly welcome any improvement to parking facilities, pedestrian access and vehicular movements in this particular area of St. Martins.

Due to the site's boundary locations, a new fire hydrant would have to be provided for the proposed housing development of 15-22 houses. The exact location of the new fire hydrant could also offer the potential to improve Fire Service access to existing emergency water supplies that cover the St. Martin's primary and infant's school.

### **Officer Response**

Requirement for new fire hydrant noted.

#### **Recommendation:**

Add paragraph after 9.32:

9.33 A new fire hydrant would be required to serve the development. The exact location should be agreed with Guernsey Fire & Rescue to enhance existing supplies in the area.

### **Constables of St Martin**

We thank you for the opportunity to comment on the above and following our Douzaine meeting here are our collective views.

Whilst we accept that some residential development will take place in the local centre boundaries this one does include a school and highlights the following concerns.

1. We have concerns how the school will cope with the additional students if this residential along with others in the area go ahead, as they are at capacity now.
2. We feel the car park is not adequate now and is a major safety concern as children run through the congestion and we would like to see an increase in its size with proper access and parking for school drop offs and collection. Currently the car park gets gridlocked at school times which stops other users movements during this time.
3. The entrance into the Grande Rue can be improved but not widened within this plan and we have concerns over the additional movement depending on the amount of housing allowed that will increase an already busy exit and entrance.
4. We would like to see a reduction in the amount of dwellings planned and that all would be designed with adequate parking on site, we would suggest a minimum of two spaces per household. Less parking per unit would result in the car park being used and this would reduce usage for businesses in the area that would affect there viability.
5. We would prefer that derelict sites within the parish be used (St Martins hotel for example) that are on the edge of the village therefore reducing traffic flow in and through Grande Rue and putting less strain on the car park.
6. We are supportive of the pathway through to the CO-OP site but would not like to see it now or at anytime in the future become a roadway.

We hope you take our concerns into account during the planning process.

### **Officer Response**

1. Education Services have been consulted and do not raise any concerns regarding the capacity of St Martin's School.
2. These concerns are recognised within the Framework, and an assessment of parking requirements is required to support any formal application (Paragraph 9.19). The Framework also identifies the need for appropriate segregation of vehicular and

pedestrian movements, and the identification of an appropriate area for school traffic.

3. The Framework identifies opportunities for improvements to the site access, but intentionally does not specify the nature of those improvements so as not to limit options. Improvements could include widening of the existing access, but could also include amalgamation of accesses, limiting the points of access on to La Grande Rue. Any proposed solution would be developed at application stage in consultation with Traffic & Highways Services.
4. The Island Development Plan seeks development to make efficient and effective use of land, whilst also proposing an appropriate mix and type of housing in accordance with the Housing Needs Survey. The proposed density is indicative, taking into account the constraints of the site, and the final housing numbers will be determined at application stage by a detailed analysis of the site constraints and the housing requirements of the Island. The approach taken to estimate the potential density follows the methodology set out within the Strategic Housing Land Availability Assessment and used in the preparation of the evidence base for the Island Development Plan. In respect of the parking proposed for the new housing, this will also depend on the types of housing proposed. The Framework therefore requires “appropriate parking provision” and this will have to be justified as part of an application, taking into account the assessment of parking requirements mentioned above and considering sustainable transport options.
5. This site has been brought forward due to interest expressed by the property owners for development. It does not prohibit other sites being brought forward by the respective property owners.
6. The potential identified for a link to the Co-op car park is specifically to enhance the pedestrian network and not to provide additional vehicular access, which is focussed to the north-east of the site.

In light of the above, whilst the comments of the Constables are noted, no amendments are proposed to the Framework.

### **Public Comments**

#### **Steve Gill**

I oppose any development in this area.

St. Martin is a rural area. Guernsey does not need any more housing in the Parish. Especially overpriced houses the ordinary Guern cannot afford. Developers only want 90% + on their return and affordable homes will not be in their bracket. No more development in this area please!

As an ex St. Martinais I know the area well.

1. The car park is essential for shopping in the area especially Valpy's, the Co-op and Senners, the bakers and other businesses. The Parish school also needs the car park, and the children do not need more traffic! It is also essential for the Methodist church, funerals, weddings, christenings and general Sunday services.
2. The fields are protected agricultural areas.
3. Traffic in the area is already at saturation point.



4. A recent planning application in a nearby area was accepted against the will of the people. Please listen to the people not the greedy developers.
5. ENOUGH IS ENOUGH. Please stop developing rural areas. Old greenhouse sites .... may be. Actual green fields.... NO!
6. And leave the CAR PARK alone....it is absolutely essential!
7. Development: Stick to Brown Field sites and old vineries. Not green field sites in heavily built areas already saturated.

### **The Masonic Centre, Rue de la Vallee, St Martin**

We write to your department regarding the above proposed Development Framework to express our grave concerns the daily effect any subsequent development is likely to have on our 600 members and visitors.

Septimal Limited represents the Freemasons of the Bailiwick of Guernsey who make daily use of the purpose-built Masonic Centre, which can be seen in the area within the red boundary below, to the West of the area covered by the proposed Development Framework.

We have approximately 4 car parking spaces at the Centre which are frequently used by the less ambulant and wheel chair members. Those more ambulant make use of the only available public parking spaces which are in the centre of the area covered by the proposed Development Framework and accessed via the pedestrian link to the school (Photos 13 & 16 of your draft report).

The majority of our meetings are held after 5pm during the week and only occasionally at weekends. The car park is heavily utilised by the public in the area during the day for various amenities as identified in your draft report and by us in the evenings, when otherwise its use is currently minimal.

Our concern is that the proposed parking allocation for the housing development will not meet 100% of the home owners needs and a natural overflow into the public car parking area will occur, particularly in the evenings. This event is very likely to occur and cannot be policed/prevented.

The use of parking in this way in the evenings will have a significant detrimental effect to the Province as there is simply no alternative parking provision within a manageable safe distance for the majority of our members.

When planning permission was granted to Septimal Limited for the construction of the Masonic Centre in the late 1990s the availability of sufficient public parking in the proximity of the Centre was a necessary qualification for such consent being granted. It is therefore imperative that the current public parking area with the current pedestrian access to the Centre remains available to our members.

We trust the above sufficiently brings our concerns to your department for careful consideration in the continued development of this draft Development Framework.

**White Meadows, La Grande Rue, St Martin**

St Martins is a lovely parish and should not be turned into a concrete jungle. Permission has already been granted for the building on land in La Vallee Road next to the Masonic Centre and also nothing seems to be being done about the site in Les Merriennes (which was known as Ronnie Ronalds Hotel), and also there are questions being asked about Blanchés Pierres Lanes.

The Grande Rue is a very busy area, taking a lot of traffic from St Peter Port to the Airport. Also has a lot of congestion with traffic going to St Martins School, and also in the car park. I have people who park in my drive to pick up grandchildren from School as the car park is so full, and also people parking for funerals in St Martins Church and also Les Camps Methodist Church.

The suggestion of a drop off and pick up point in the car park may seem a good idea. This will only add even more congestion and cause further problems with cars entering and exiting from the car park into the Grande Rue.

When I enquired sometime in 2005 or 2007 about possible development of the field next to my property I was told it was earmarked for recreational purposes. In 1992 when we bought the property it was used by a farmer and cattle were grazing for many years, in the last few years horses have been in there.

20-22 houses on this field is going to cause more congestion on an already busy road, very few house holders have only one car per family, so 2 or 3 cars per household will congest the car park even more. I am sure the Co Op has sufficient parking for their shoppers, I have never seen that car park full. As my house is adjacent to this development (copy of your development plan page 17 highlighted in pink) I am sure this will devalue it, so can I expect compensation for the devaluation of my property.

**Livingroom Estate Agency & Hollybank, Les Hubits de Bas, St Martin**

I would like to make a representation about the planning framework for Briarwood in St. Martins.

My personal and professional view is that the area in question is not best suited to housing and that it would be remiss of the department not to encourage use of this area for amenities to add to the Village centre. This is a great opportunity to enhance the community facilities and to 'think outside the box' with regards to its use. If the space allows it could be additional retail spaces and/or eateries perhaps with a park/green public space.

I believe that the addition of more housing in the Briarwood location would lead to excessive density given the GHA development which is due to be built very nearby and the already dense residential housing in La Grande Rue, Rue des Coutures, Burnt Lane and of course the additional housing being built further along in Rue des Blanchés.

There is a greater need for amenities to service the existing housing rather than adding to the housing stock.

### **Maison Marivon, Route des Couture, St Martin**

With reference to the above proposal, I wish to oppose this proposal for the following reasons.

#### Over development in St Martins

With the recent developments in St Martins, Rue Jehannnet and Route des Couture. The parish is becoming a bottleneck. Further development on Grande Rue would just exacerbate the situation.

#### Traffic Impact

The Grande Rue is the busiest road in St Martins. It is the route in and out of town for 5 buses.

There are 5 businesses on Grande Rue which all require deliveries involving large vehicles. Any more traffic would add to what is already a **VERY BUSY** road. At peak times the traffic on Grande Rue and the surrounding roads is always gridlocked. It is the route into the south side of town for traffic coming from the west.

#### Conservation and Archaeology areas/green spaces.

Part of the proposal could have an impact on the conservation area and also an area of potential archaeological interest. Also, this would be another piece of green space lost to development.

This area is a natural habitat for all kinds of wild life and the loss of this would be catastrophic.

I hope that you will take my views into account and I urge you to reject this application.

### **Bwthyn Bach, Route des Camps, St Martin**

I am writing to you to vehemently oppose the proposed development in St Martins.

My house is situated next to Les Blanche Pierre and I have lived there since 2000. One of the main reasons for purchasing the house was the quiet garden behind my property.

The land behind my property was sold by my neighbours a couple of years ago and there has been increased noise from the extended Co-Op car park.

There is a well between the two properties. At the moment the large trees behind the property take up much of underground water and it worries me that if they are taken down and new residential properties built that the water level will rise and potentially damage the properties.

Also, you can currently hear the birds singing in the trees which again removing the trees will have an impact on the wildlife.

With the proposed development my garden will be overlooked from the back (please see photos attached). The proposed pathway would run at the back of my property. I would envisage it would be a place for youngsters to congregate and potential rubbish thrown into my garden.

The car park is the only public car park in St Martins. This car park is currently used by staff from the Co-op, Estera, Valpy's and Anson Court. In the evenings the car park is used on a regular basis for the Masonic meetings.

The car park is already busy with customers for Ogier's and Valpy's. With an additional 20 plus houses there could be an extra 40 plus cars. The bus stop in the mornings is used by the pupils of Les Beaucamps school and they have to wait on the narrow pavement. With the additional cars there would be extra traffic with potential danger for the pupils.

St Martins Primary School is one of the largest primary schools on the island and is already busy at drop off/pick up times. There have been new houses already built at Les Genat Estate and next to the Masonic hall. There are other sites that could be used e.g. the old St Martins Hotel site which is currently looking like an eyesore.

Obviously, there is also the fact that the proposed development would devalue the price of my property.

Taking all this into account, please note that I do object to proposed rezoning of land.

#### **Coniston, La Grande Rue**

- 1 Access to and from the car park causes a lot of congestions as it is now and thus the addition of so many houses would only add to this, and cause pollution and unnecessary delay on grand Rue
- 2 22 properties is too many surely, and such a number would demand that the developer include several social housing units. Given there are already several new social housing developments already on route de couture and just by the masons lodge, isn't there enough developments of such housing in St Martin? All such developments add to the pressure on schools and roads etc in the area and St Martin School particularly is 1 of the largest on island with biggest class sizes
- 3 Perhaps a better use of the land if it has to be built on might be as part of a school expansion to accommodate all the extra children from St Andrews and all the social housing developments more adequately?
- 4 The housing along Grande Rue is more the larger detached dwelling like Attenbrough House or La Cachette etc so surely 22 properties would be totally out of keeping with what is already there, and maybe 4 or 5 larger properties or similar, might be a more reasonable number or more fitting with such housing already in existence, and not affect access and congestion significantly?

#### **Officer Response**

The key issues raised by the public are summarised as follows:

- Requirement for additional housing in the parish;
- Requirement for alternative forms of development in the parish;
- Importance of car park to Local Centre;
- Increased traffic – Congestion and public safety;

- Loss of agricultural/open land and impact on wildlife;
- Impact of loss of trees on the water table;
- Impact on the amenities of neighbouring properties;
- Devaluation of property.

***Requirement for additional housing in the parish***

The spatial strategy for the distribution of new development within the Island, as set out within the Strategic Land Use Plan and the Island Development Plan, is to allow for limited development within and around the edges of main parish or local centres to enable community growth and the reinforcement of sustainable centres. The current proposal is therefore consistent with strategic and plan policy.

The density of development is addressed in the Officer's Response to the Constables of St Martin comments above. The draft Development Framework gives an indicative density range of 20-30 dwellings per hectare in this area, which would comprise approximately 15-22 dwellings on this site. For the purposes of comparison, recent approvals at La Valle Vinery, c75m to the south-west of the site, (2016) and Edgebaston Vinery, c550m to the south-west of the site, (2016) had densities of 23 and 32 dwellings per hectare respectively. It is not considered that the additional development of this site for 15-22 dwellings would cause harm to the amenities of this Local Centre.

In terms of 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, including the Housing Needs Surveys and other relevant information held by the States of Guernsey, and reflective of the demographic profile of households requiring housing. Current evidence suggests a need for 1-3 bedroom units, primarily 2 or 3 bed. It is therefore unlikely that proposals for larger dwellings would be supported. This allows for a somewhat higher density than, for example, 4 or 5 bedroom homes, but a lower density than, for example, a development of solely flats or apartments. As stated within the Framework, where a proposal is for 20 dwellings or more, there would also be a requirement for a provision of affordable housing.

In conclusion on this point, an approximate density range of 20-30 dwellings per hectare on this site is felt to balance the requirements of policy, though 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 merits based on the relevant Policies of the IDP as part of the consideration of a planning application.

In terms of the capacity of St Martins School, as stated above, Education Services have been consulted and have raised no concerns in this respect.

***Requirement for alternative forms of development in the parish***

Whilst the policies of the Island Development Plan do provide for limited development within the Local Centres for a range of uses, in this case the land owners have expressed an interest to bring this site forward for housing development. Island Development Plan policies support housing development within the Local Centres and there would be no mechanism to require an alternative form of use. The Framework therefore focusses on

development of the site for housing. Should a proposal come forward for an alternative use, eg through a Community Plan, a revised framework could be developed in respect of that use.

### ***Importance of public car park to Local Centre***

The importance of the public car park is identified within the Framework, including in relation to a formalised drop off and collection point associated with the school. Under both the Site Analysis and Development Guidelines (Paragraphs 8.6 & 9.19) it is identified that further assessment of the parking requirements for the Local Centre will be required to support any proposals for development.

Paragraph 8.6 states: The site provides 80 public car parking spaces associated with the Local Centre. This provision should be maintained and enhanced where appropriate. In particular, there may be opportunities to provide a formalised school drop off and collection area either within the site or on adjacent land. If provision is made on adjacent land, an assessment of the parking requirements in this area would need to be undertaken to justify any change to the number of public spaces provided on site, and to inform the layout of these spaces to maximise use of land.

It is however noted that the requirements of the Masonic Lodge may not be an obvious consideration and are not explicitly referenced within the Framework. It is therefore recommended that that use is included within the list of users set out in paragraph 7.7.

In terms of the potential use of the car park by residents of the new development, it is noted that this may be an efficient use of land, however any such use could be controlled, if necessary, by limiting the number of long stay parking spaces.

#### **Recommendation:**

Amend paragraph 7.7 as follows:

7.7 The car park serves a range of users, including residents in the area, shoppers, visitors to the facilities in the area, *members of the adjacent Masonic Centre*, those who work in the area, commuters and, primarily, visitors to the adjacent school. The layout of the car park is generally adequate to cater for demand, with the exception of school pick up and drop off times when the car park becomes saturated with traffic. There is no specifically designated area for the school traffic. Traffic management is therefore a significant issue for the site.

### ***Increased traffic – Congestion and public safety***

In their initial consult response, Traffic and Highway Services acknowledged the limitations of La Grande Rue, however recognised the opportunities to improve Road Safety and Traffic Management as a result of development of the site.

Paragraph 9.15 of the Development Guidelines states that proposals must demonstrate compatibility with Policy IP9 (Highway Safety, Accessibility and Capacity), where the road

network must be able to cope with the increased demand resulting from the new development, and specifically notes that consideration will need to be given to the impact of increased traffic movements on the existing situation on La Grande Rue. The paragraph goes on to state that a Traffic Impact Assessment may be required to support proposals for the site.

Any traffic assessment would need to include the potential cumulative impact on traffic, taking into account other approvals in the area. It is however noted that the extant permissions for development in the area are predominantly located to the south-west of the site, accessed via the network of lanes to the south-west of La Grande Rue. The site which forms the subject of this Framework would be accessed directly from La Grande Rue and would not impact further on the traffic within the lanes.

The Development Guidelines emphasise the importance of traffic management, access and pedestrian safety improvements as part of the proposed development, in paragraphs 9.14-9.20.

In conclusion, traffic generated from the site and its impact on the surrounding road network would be assessed further at the planning application stage, once the proposed number of units on the site has been established, and in consultation with Traffic and Highway Services. The proposed development would be expected to deliver significant road and pedestrian safety improvements, particularly with regard to movements within and immediately adjacent to the site.

#### ***Loss of agricultural/open land and impact on wildlife***

The field is not located within an Agriculture Priority Area and is not subject to any other designation which protects agricultural use. The field comprises an isolated piece of land with poor access, and is unlikely to be used for commercial agricultural purposes. Furthermore, the field is used for the grazing of horses and in this densely developed area the use of the land for any intensive form of agriculture would be likely to have additional neighbour impacts.

The Site Analysis does identify that the field comprises a form of habitat that is declining on the Island (Paragraph 8.14) and recommends that opportunities be taken to incorporate landscape and biodiversity enhancements into any proposals to mitigate against the loss of that habitat. This is reinforced in the Development Guidelines (Paragraph 9.28).

#### ***Impact of loss of trees on water runoff***

In terms of the impact on water levels and runoff resulting from the proposed development and associated loss of trees, the Development Guidelines set out a requirement for a Surface Water Management Plan to be submitted as part of an application, detailing the treatment, attenuation and discharge measures proposed (Paragraph 9.31).

### ***Impact on the amenities of neighbouring properties***

One respondent raises concerns that their garden area will be overlooked by the development site, and that there will be noise nuisance from the new properties and litter arising from the new public footpath.

The Development Framework highlights the need for development to have regard to neighbouring properties and identifies 'Sensitive Boundaries' along neighbouring residential boundaries (see Image 12: Site Analysis and Image 13: Development Guidelines). The 'Sensitive Boundaries' designation does not however extend along the full extent of the residential boundary to the south-east and it is recommended that this designation is extended.

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. Impact on neighbouring properties would therefore be a key consideration in the assessment of a formal planning application, and would be expected to inform the layout of development on the site.

In terms of the public footpath, it is recommended that an additional note is added to the Development Guidelines, referencing the need for any new routes to take into account the amenity of adjacent residential units.

#### **Recommendation:**

Amend Images 12 & 13: Extend the 'Sensitive Boundaries' designation along the full extent of the residential property adjacent to the south-east site boundary.

Add sentence to the end of paragraph 9.18:

All routes should be designed to maximise safety and usability whilst taking into account the amenity of adjacent residential units, whether existing or proposed.

### ***Devaluation of property***

Whilst the Framework does set out a requirement to consider the impact on the amenities of neighbouring residential properties, the devaluation of property is not a material planning consideration and cannot therefore be taken into account.



### **Additional amendments recommended by the Planning Service**

#### **Recommendation:**

7.2 Amend 'north' to 'north-west'.

7.5 Amend 'south-west' to 'north-west'.

8.14 Amend final sentence to read: The tree survey (Appendix 2) however identifies that the trees are of varying quality and expected lifespans. Opportunities should be taken to retain landscape features or to limit the impact of the loss of those features, if justified, through the incorporation of landscape and biodiversity enhancements into proposals.

### **Summary**

The consultation process in respect of the Draft Development Framework has elicited a limited 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 Briarwood site. Once finalised, the Development Framework will provide a valuable supplementary policy context for determining any subsequent planning application(s) for the site.