

## Leale's Yard Regeneration Area Development Framework

### Stage 3 consultation summary report

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May 2020

#### Introduction

Following the initial consultation process, the Leale's Yard Regeneration Area Development Framework was drafted and approved for Stage 3 consultation. The Draft Development Framework underwent a six-week long consultation period between Monday 17<sup>th</sup> February – Friday 27<sup>th</sup> March. During this time, the document was available to review online via the States planning website, and six A1 exhibition boards were displayed in the former Smilers unit on Southside, The Bridge. The exhibition boards summarised the key elements of the document, including the 13 Development Guidelines.

A5 leaflets were prepared and distributed amongst local residents and shop owners notifying them of the ways in which they could review the document and send feedback, as well as to advertise the public drop-in session that was held on Saturday 29<sup>th</sup> February, from 10am-3pm, at the Salvation Army Community Centre, Nocq Road. This event was well-attended by the community, with around 100 attendees, and two representatives of the Planning Service (one member for half of the session) as well as two people from Tibbalds who were available to answer questions and discuss concerns. During the drop-in, Tibbalds also held pre-arranged one-on-one conversations with a number of key stakeholders, including some representatives who we spoke with during the initial consultation period. This included the Vale Douzaine, St Sampson Douzaine, Salvation Army, and the Health Improvement Commission. We discussed their feedback on the Draft Development Framework, addressing concerns and noting their suggestions. The St Sampson Douzaine representatives also noted that they were pleased to see how some of our initial conversation had been incorporated into the draft document.

Following assessment of our initial consultation, we noticed feedback from younger age groups was underrepresented. With assistance from the project team, we secured a workshop at the Youth Commission with members of the Youth Forum. Two sessions were also arranged with the Year 11 high school geography class, however due to the emerging coronavirus pandemic, these were cancelled at the last minute. The workshop at the Youth Commission was a two-hour interactive session with four Youth Forum members, ranging

from Year 9 to 6<sup>th</sup> Form. In this workshop, Tibbalds introduced the site and the purpose of the Leale's Yard Regeneration Area Development Framework, and how it fits within the Guernsey planning system. Tibbalds asked the Youth Forum members what they liked and disliked about The Bridge, with the majority of them not being from the area but knowing it from having music lessons and youth groups, etc, in local venues. The session included a hands-on workshop where participants gathered around a large plan of the site, and Youth Forum members were asked how they would design the site if given the opportunity.

Tibbalds, with a member of the Planning project team, also met with the CI Co-op Society as the principal landowners during the consultation period. During this meeting, the Co-op shared their initial feedback of the draft Development Framework, to which Tibbalds and the Planning Service sought to provide further clarification on the purpose of the document and its contents. Following this meeting, the Co-op provided more detailed feedback and comments on the draft Development Framework, which will be taken into account.

In summary, over the six-week consultation period, we:

- Received **40 responses from the general public**, including a petition gathered by Bridge shop owners;
- Heard from **9 key stakeholders and organisations**, either in person or via e-mail (including Vale Douzaine, St Sampson Douzaine, Salvation Army, Health Improvement Commission, Guernsey Housing Association, Guernsey Community Foundation, La Societe Guernesiaise, the Youth Commission and the Chamber of Commerce);
- Received **11 responses from Committees, Service Areas & Utility Companies** (including Property Services, Policy & Resources, the States Trading Supervisory Board (STSB), Health & Social Care, Guernsey Electricity, Fire Safety, Environment & Infrastructure, Employment & Social Security, and the States Archaeologist);
- Received **3** responses from Deputies; and,
- **Shared correspondence with the principal landowner**, the Channel Island Co-operative society.

The main concerns of each key stakeholder group are summarised in the following sections.

The lockdown response to the Covid-19 coronavirus pandemic, which required people to stay at home, began in Guernsey on 00:01 on 25 March (3 days before the end of the consultation period) and therefore had limited effect on the overall consultation period due to material being available to review by the public online and responses received via e-mail. The in-person drop-in session also preceded lockdown measures.

## A. General public

Feedback forms containing a list of seven questions were provided at the public drop-in session, which people were invited to fill out in person, or to submit later via e-mail. The questions and key responses are as follows:

1. *Do you agree with the proposed Vision Statement and key principles for the Leale's Yard Regeneration Area?*

- 80-90% of respondents to the question answered 'Yes' to all, with the highest proportion (90%) in support of Principle 3: Open space and public realm at the heart of the development

2. *What are the three most positive things that the draft DF proposes in regards to the regeneration of the Leale's Yard main development site and the Bridge Main Centre?*

A variety of responses were provided with the top five answers gaining consensus as follows:

- Community centre (18% of responses to the question)
- Public open space (18%)
- The possibility of something happening to improve the area (15%)
- Good movement network, including a dedicated walkway (13%)
- Parking moved from the Bridge (10%)

3. *What are your three main concerns about what is proposed within the draft Development Framework? How could it be improved?*

A variety of responses were provided with the top five answers gaining consensus as follows:

- Parking moved from the Bridge (14% of responses to the question)
- Additional traffic / issues with access (14%)
- Timing and possibility of it not happening (10%)
- Amount of housing proposed\* (10%)
- Loss of open space / not enough open space provision (9%)

(\*Note: Development Guideline 7.8 considers that the site could accommodate between 50 and 350 homes, dependent on the quantum and range of other uses, and the indicative layout plan on the exhibition boards showed "around 190 new homes")

4. *Do you think the draft Development Framework will support the positive regeneration of the Bridge Main Centre?*

- 60% of respondents answered 'Yes', with 35% 'Not sure'

5. *Which of the initial options of the public realm and parking area on The Bridge frontage do you support and why?*

- 53% of responses to the question preferred Option 3 (an extended harbour wall and the majority of parking moved inside the main development site), however under additional comments, 55% of respondents supported parking to be kept in

front of shops (which is a scenario more reflected by Option 1). To support this view, a petition was prepared by local shop owners with the statement *“Under new schemes being proposed by Planning we could lose the 50 parking spaces in front of the shop. If you don’t want to see this happen please sign our petition below”*. Due to the lockdown measures imposed due to the coronavirus pandemic, shop owners were unable to retrieve the petitions at the end of the consultation period and submit them physically. Instead, photographs of the petitions were e-mailed through, from which we tallied around 500 signatures based on these images.

- 14% supported none of the options, with reasons including that “all fail to address flow of traffic and to [simultaneously] keep the ability to ‘drop in’ to the Bridge”

6. *Do you agree with the Development Guidelines?* (Respondents were asked to mark a sliding scale bar from Mostly disagree – Agree – Strongly agree)

- 41% of respondents ‘Agree’
- 23.5% ‘Mostly disagree to agree’
- 23.5% ‘Agree to strongly agree’
- 12% ‘Strongly agree’
- 0% ‘Mostly disagree’

7. *Are there any other changes you would suggest to the Development Framework, if any?*

A variety of responses were provided with the top three gaining consensus as follows:

- Salvation army church & community centre being incorporated (19%)
- Multi-storey carpark (11%) (however 3% also disagreed with this being suitable for the site)
- Relocate Co-op supermarket to within the site (8%)

## Conclusions from public feedback

The public were generally supportive of the draft Development Framework and its contents, however many held reservations due to how options had been presented regarding improvements along the Bridge (i.e. it was apparent that many people viewed these options as final solutions). Most of the negative feedback was centred around the concern that removing any proportion of parking along the Bridge would be detrimental to the viability of shops as there is a prevalent ‘drop-in’ culture to which many shop owners owe their ongoing viability.

As similar with the initial consultation, many people acknowledged that traffic flow was hindered by people not following the rules to not stop at the southern end of the Bridge parking area which created a ‘bottle-neck’, hindering traffic

flows. For this reason, some people did indeed support moving some or all of the Bridge frontage parking to inside the main development site, making it clear that traffic and public realm improvements at the Bridge is a contentious local issue.

A lot of positive feedback focused on community-centred elements such as the minimum requirements suggested for a community facility and the two key areas of public open space – one being a green space and the other being an urban ‘market’ square. Including these features was a direct response to the overwhelming amount of feedback receiving during initial consultation, and feedback in this period was happy to see it included particularly as they would be sheltered from the weather and easily accessible by those less physically able. The fifth highest number of responses to ‘concerns about the DF’ (Q3 above) was that there was not enough public open space.

Providing a dedicated pedestrian and cycle path along ‘Bridge Avenue’, and generally a safe network of footpaths to move around the main centre was also viewed positively.

There were mixed feelings regarding the Development Framework generally in terms of viewing it as a positive step towards the regeneration of Leale’s Yard, as well as many people concerned whether the Development Framework was genuinely helping to find a viable solution, and whether this additional step in the planning process would continue to delay something happening on the site.

### Proposed actions to update the Development Framework in response to public feedback

- 1. Review and consider amending wording regarding the potential improvements to the Bridge to ensure the included concept options are communicated as indicative only which will need further detailed development to understand the technical and economic implications to the area, and to include that based on public consultation feedback that any potentials changes could happen gradually over time with potential for some testing before implementation*
- 2. Review and consider amending wording to explain how other guidelines within the DF can support a reduced parking provision along the Bridge, including if dedicated parking is provided within the main development site*
- 3. Review and consider amending wording and emphasis generally to ensure that illustrative material is clearly labelled as indicative and only a representation of how the minimum areas of public open space and other Key Delivery Requirements (refer to D. Principal landowner) and Development Guidelines could be integrated as part of a comprehensive scheme.*

## **B. Stakeholders and organisations**

During initial consultation, we spoke with the St Sampson and Vale Douzaines, the Salvation Army, and the Guernsey Community Foundation, and therefore asked these stakeholders to review the draft Development Framework and provide us with their feedback. In addition to these groups, we also received and/or engaged with other key organisations on the island including the Youth Commission, Health Improvement Commission, Guernsey Housing Association, and La Société Guernesaise. A summary of key feedback from these groups are as follows:

### Vale Douzaine (Richard Leale)

Mr Leale had no major problems with the indicative layout plan shown on the exhibition boards (the Concept vision plan), however he was concerned that there was potential for anti-social behaviour in the area of hard public open space near the Bridge. He also felt that the precedents images included within the DF did not reflect Guernsey.

He favoured the flood defence solutions which completed and extended the harbour wall, preferring Option 3. He also supported the idea of a roundabout at the Nocq Road/Bridge junction to allow traffic to travel west-to-east more easily.

### St Sampson Douzaine (Rob Gill, Andy Carre, Michael Beaumont, David Hugo, Leonie Le Tissier)

There was a shared concern regarding a handful of issues including: building heights, questioning whether it was necessary for any new buildings to go beyond 1-2 storeys; the co-ordination and delivery of key infrastructure including the main access point from the Bridge; and, whether the site would have more than one access point to prevent future 'bottle-necking'. The group also wanted further clarification for what is deemed fixed and flexible with the framework.

Generally, they felt the public would be more supportive if they saw issues along the Bridge (e.g. traffic flows hindered by 'bottle-necking') solved first. They were happy to know that the Development Framework would require a comprehensive approach to flood defence, and Ms Le Tissier particularly supported the proposal to move parking away from the Bridge as well as the suggestions for a new café/restaurant within the main development site: "I need somewhere nice to come and eat, there's nothing at the Bridge now". There was a suggestion to include a covered area as part of the hard public open space, or 'market square', to ensure that it could be used year-round.

## Salvation Army (also landowner) (Jamie Hill, chaplain, Andrew Male, architect, and Keith Tostevin)

Representatives from the Salvation Army were deeply concerned about the impact the Development Framework will have on the potential for their church and community centre to be a part of the future redevelopment scheme, due to the timing that will likely be required for the Co-op development proposals to go through the planning process.

They requested that Image 7.6 Uses Framework Plan be updated to include 'community uses' on the site at the corner of The Bridge and the main access route. They also suggested that 'comprehensive development' needed to be more well-defined within the DF, and enquired what guidance the DF provides for other sites within the Regeneration Area, but outside of the main development site.

They also supported a strategic approach to phasing to ensure a wide variety of issues and building needs, e.g. parking, would be considered carefully within the build-out sequence.

## Youth Commission (Youth Forum representatives ranging from Year 9 to 6<sup>th</sup> Form)

In response to 'what do you like or dislike about the Bridge Main Centre?', the list of dislikes formed quickly with responses like: "nothing to do", "run-down shops", "feels unsafe at night", "nowhere to sit", "not a wide variety of shops", and "unattractive". The list of things they like included a particular takeaway ('Atan'), the School of Popular Music at Delancey Park, the harbour, Vale Castle, summer school events at The Rock Community Centre, and youth clubs. In discussion, the Youth Forum members agreed that if they were waiting at The Bridge, i.e. before music practice, they would end up walking around in the supermarkets as there was nothing else to do.

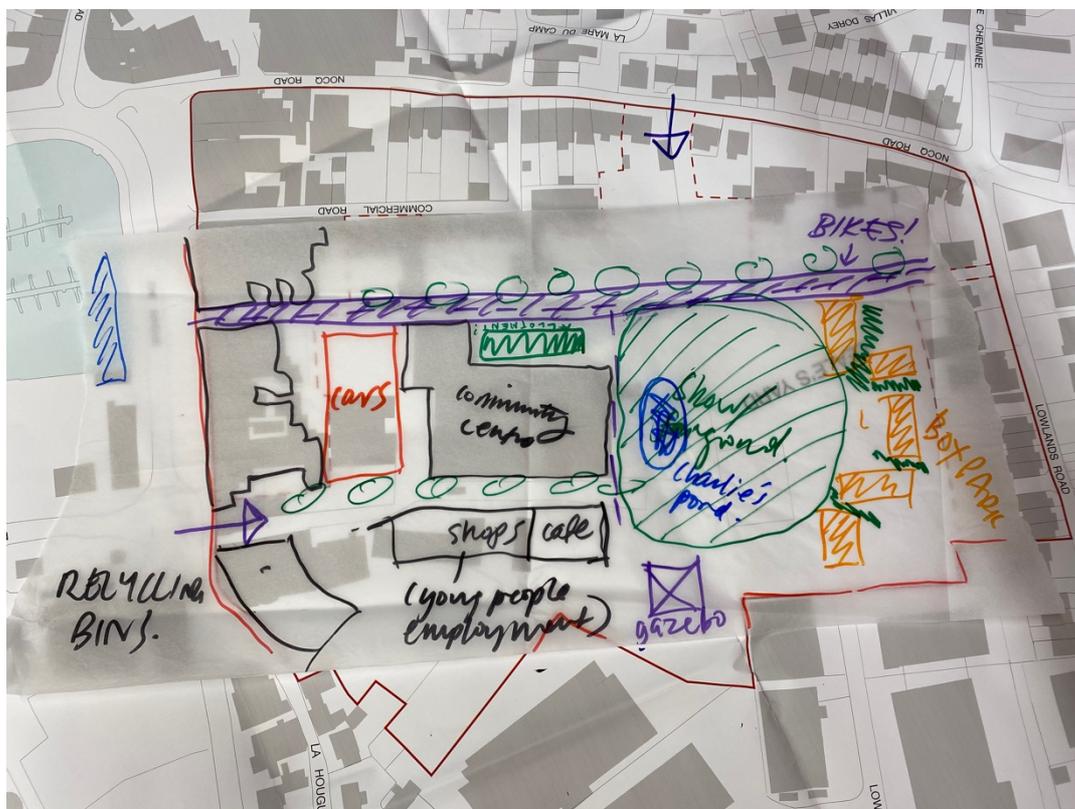
When asked what they would like to see as part of the redevelopment of the Leale's Yard Regeneration Area, the Youth Forum members created two different concept plans (with assistance from Tibbalds) which brought together a number of the ideas that come out as part of the conversation. They made suggestions for the appropriate locations of different uses and in both plans (see below), they felt it was important to:

- retain and repurpose the existing large shed on the site
- include trees and green spaces e.g. allotments, open bbq areas with community benches, covered outdoor areas and/or public greenhouses (e.g. inspired by Kew Gardens)
- include community facilities that can host interesting events and classes for all ages (e.g. cooking, dance, etc), as well as quiet places for retreat or youth 'safe spaces'

- enable the presence of biodiversity, including educational boards and nature trails
- include leisure uses (e.g. cinema, trampolining, bowling alley, etc) for young people and families
- provide uses that could offer employment opportunities to young people
- have dedicated walking and cycling routes
- create a fun, lively and interesting place, e.g. with public art, a London 'Boxpark'-style food market, cafés/restaurants, and somewhere that celebrates heritage
- include elements of water, e.g. ponds



Youth commission workshop – Concept plan 1



Youth commission workshop – Concept plan 2

## Health Improvement Commission

The Health Improvement Commission (HIC) was engaged in person on two occasions during the consultation period. Following both meetings, the HIC provided a summary note which outlined two key feedback items for the Development Framework as well as a brief summary of supporting information that helped to illustrate the greater cause and wider benefits. Both feedback items aligned closely with the HIC’s objective, “more people, more active, more often”, particularly in regards to behavioural change and promoting environments which facilitate healthy and active behaviour for their positive effects on both physical and mental health and wellbeing. The two feedback items focused on “making the Bridge a healthy and sustainable place to live” and prioritising “opportunities for children and families to be active” and “to play”.

One specific suggestion included embedding the idea of ‘healthy lifestyles’ into one of the Vision Principles (Section 6.2), and suggested Principle 2 – Making good connections, as good connections are really about facilitating and encouraging active travel modes like walking and cycling. He acknowledged, however, that there needs to be a balance between providing parking and encouraging active travel.

Other comments were generally supportive of the Draft Development Framework and included advocating for pedestrianised routes, active travel and good connections, integrating provision for electric cars and bikes, and suggesting considering what types of eating opportunities are provided on or near the site to make unhealthy food choices less available. The precedent images within the draft DF were appreciated as modern and contemporary, in particular Image 7.20 which showed elevated walkways and modern houses behind.

The HIC's involvement with implementing "bike playgrounds" around Guernsey, which are dedicated spaces for people to practice biking (e.g. on a 100m stretch), was also highlighted and community-based activity tracks were encouraged as a positive feature that would help facilitate active movement.

#### Guernsey Housing Association (GHA)(Steve Williams)

As an organisation who have considered the potential of the Leale's Yard site, the GHA are very keen to see it developed for various reasons including the fact that it seems to be "holding back The Bridge economically and socially by staying as it is". They strongly support the need for comprehensive development on the site, particularly in reference to the Affordable Housing Policy GP11 which requires a proportion of affordable housing to be delivered based on the overall site area or number of homes delivered. They feel that the site could suit a reasonably high density with apartments having access to private outdoor space.

Other concerns included:

- the implications of an integrated flood defence strategy on the timing and delivery of the site, given that it would require co-ordination with the States,
- general viability, as they felt the Baseline report appendices by AspinallVerdi did not provide much information, and,
- that there would be a negative impact on shops if a lot of parking along the Bridge frontage was removed, which they would not support.

They acknowledged that the Bridge is a very hard urban landscape and could have more landscaping integrated, potentially between parking spaces to soften the overall appearance of the area. They also suggested that the inclusion of a café/restaurant with a harbour view would be welcomed.

#### Guernsey Community Foundation (Wayne Bulpitt, chairman)

The Foundation was pleased to see the inclusion of community uses, particularly the references included within Section 7.7 Land uses. As an organisation that supports the 3<sup>rd</sup> sector, they face challenges within the

current planning guidelines due to the initiatives they support not always fitting neatly under a single use class. For example, GO Communicate currently operate a successful Recycle/reuse retail and workshop facility which falls across training/retail/light industry uses classes from within the main development site.

The Foundation have therefore requested that these types of crossover uses, specifically community/education in addition to training/retail/light industry, could be covered as being appropriate for the site within the Development Guidelines. They have highlighted the potential for the Guernsey Community Foundation to be a partner in delivering the community facilities on site.

### La Société Guernesiaise (Jamie Hooper)

As the 'protectors' of nature, history and science in Guernsey, La Société Guernesiaise would strongly recommend that an EIA be made a requirement for the site (note, this is one of the Key Delivery Requirements, refer to D. Principal landowner section).

They also suggest the addition of a 5<sup>th</sup> Vision Principle (Section 6.2) which focuses on the support of local biodiversity to achieve a net ecological gain for the area in the long term.

### Proposed actions to update the Development Framework in response to stakeholders and organisations

- 1. Review and consider amending wording which will ensure high quality urban design principles are upheld, particularly in making the Bridge Main Centre feel safe at all hours and integrating new development sensitively within its context*
- 2. Review and consider including a list of 'issues to consider' in regards to the public realm improvements associated with the Bridge*
- 3. Review and consider how land uses and the design of the two key areas of public open space could cater to young people*
- 4. Review and consider amending wording to include less conventional combinations of uses that are of community benefit*
- 5. Review and consider potential to amend the Vision Principles to incorporate healthy lifestyles and biodiversity, or alternatively incorporate wording within the relevant Development Guidelines to emphasise these issues and, for the latter in particular, reference the requirement for new developments in England to provide a net gain in biodiversity*
- 6. Review and consider how guidance is provided for sites outside of the main development site but within the Leale's Yard Regeneration Area*
- 7. Review and consider direct requests for minor changes to text and diagrams within the Development Framework*

## C. Committees, Service Areas & Utility Companies

It is clear that the Service Area committees (e.g. Property Services, Policy & Resources, the Trading Supervisory Board, Health & Social Care, Guernsey Electricity, Fire Safety, Environment & Infrastructure, Employment & Social Security, and the States Archaeologist) collectively understand the variety of challenges facing the Leale's Yard Regeneration Area, particularly the ability to balance technical constraints, viability, and creating a sustainable, attractive and thriving place which benefits the wider community. The Committees broadly support the contents of the Development Framework, particularly the need for comprehensive development with a well-considered delivery strategy, and make suggestions for placing greater emphasis on various key issues, generally related to their Service Area speciality, including:

- Importance of providing a 'minimum' amount of open space;
- Importance of creating good access and movement connections;
- Importance of mix of housing types and sizes;
- Further co-ordination and consideration/studies of improvements to the Bridge;
- Potential for Leale's Yard to be an exemplar sustainable development for Guernsey; and,
- Flood risk mitigation and the combined issues with the high water table.

The range of responses from Service Area Committees also include reference to technical guidance which future planning applications would need to adhere to, as well as suggested rewording of various sentences/paragraphs of text to provide further clarity in reference to existing policies.

### Proposed actions to update the Development Framework in response to Committees, Service Areas & Utility Companies feedback

1. *Review the Key Delivery Requirements (refer D. Principal Landowner section) to ensure that many of the key aspects that the Committees consider priorities for the Leale's Yard Regeneration Area are guaranteed within the Development Framework, where appropriate and compatible with overall viability and providing benefit to the Bridge Main Centre.*
2. *Review and consider including additional wording to ensure the relevant policies and technical documents are referenced, and/or clarify which particular studies and assessments will need to be provided as part of any planning application.*
3. *Review the suggested rewording provided by Committees and incorporate where appropriate and necessary.*

## D. Deputies

In addition to response from Committees, Service Areas and Utility Companies, three Deputies also provided individual written feedback to the draft Development Framework which included feedback and general support for the vision and the direction of the document overall. Feedback was received following a drop-in session held in Sir Charles Frossard House on March 5<sup>th</sup>, 2020, between 2 – 6.30pm which aimed to set out the draft Development Framework and explain the process. Deputies Inder, Paint, Merrett, and Brouard attended this session.

Their responses covered several issues including:

- the need to make the most of this opportunity to provide, protect and ensure good quality public open space into the future;
- the status of trees currently on the site;
- the need to determine a clear approach to flood risk mitigation and design, including the potential to incorporate innovative design;
- the need to mitigate any impacts on adjacent existing properties, particularly residents, and,
- the general need to retain momentum on progress with Leale's Yard.

### Proposed actions to update the Development Framework in response to Deputies feedback

- 1. Review text and diagrams to ensure the issues they have highlighted have been covered within the text, and where rewording or additional text could benefit, amend accordingly – in particular addressing sensitive boundaries and relationships with existing properties*

## **E. Principal landowner, CI Co-op Society**

The Co-op Society have a number of concerns with the draft Development Framework which are largely related to the level of detail it contains, compared to other DF documents prepared by the States. They have requested that much of the text is reviewed and simplified, that illustrative material be moved to the appendices, and that acceptable densities or quantum are clearly set out. The Co-op reiterated these views over two subsequent letters of correspondence following their initial draft feedback.

The purpose of the Development Framework has been reiterated to the Co-op, in that there are a number of aspects that have been left as flexible to allow the market to dictate a viable solution, due to the risk and likelihood that the market may change over time, which is emphasised by the Covid-19 pandemic's effect on local and global economies alike. Other aspects of the framework however are more fixed based on what we believe are good practice masterplan and urban design principles to ensure long-term viability and benefit to future residents, property owners, business owners, and visitors.

It was acknowledged that fixed requirements and recommended guidelines were not explicitly differentiated within the draft Development Framework, and therefore a list of 'Key Delivery Requirements' was created by the project team during the consultation period which will be included within the final document. This list includes 15 minimum requirements for the Leale's Yard Regeneration Area to deliver, and reflects aspects that were taken into consideration when testing viability.

Additional concerns included that some of the illustrative material was not labelled clearly enough as indicative, or was drawn in an unnecessary amount of detail, and therefore quickly interpreted by the public as the revised scheme. They also felt that the draft Development Framework included projects and sites outside of the main development site and therefore the Co-op's ownership. While they understand that providing a comprehensive flood defence strategy will be a Key Delivery Requirement, the Co-op have suggested that the Development Framework is more clear in communicating that this may be subject to co-ordination and involvement with the States. A similar concern applies to the design and delivery of the Bridge public realm and other key infrastructure improvements that intend to provide a greater benefit to the Bridge Main Centre.

The Co-op have also requested throughout correspondence that the detailed viability analysis undertaken by AspinallVerdi to support the formation of the Development Guidelines be made available. It is the decision of the States

that the detailed information within the viability report is commercially sensitive and therefore cannot be shared freely. It is widely acknowledged by the client and consultant team that the ability for the Co-op to deliver redevelopment of the site is based on financial viability and this is the basis of creating a flexible Development Framework which does not firmly dictate the specific uses permitted on the site, nor specific quantum(s) which could limit the scope of development at a future date.

*Proposed actions to update the Development Framework in response to principal landowner feedback*

- 1. Review and consider amending and simplifying text where appropriate.*
- 2. Review where the Key Delivery Requirements should be introduced within the overall structure of the document, and also consider including text to clarify that Development Guidelines not included within the Key Delivery Requirements are recommendations and any departures from these will need to be justified through the planning process.*
- 3. Review overall structure of document to ensure illustrative material is clearly an indication of how the Key Delivery Requirements and Development Guidelines could be integrated as a comprehensive scheme.*
- 4. Review overall structure of document to assess and confirm how chapters that refer to aspects outside of the main development site relate to other content within the DF*
- 5. Review and consider amending wording to include that States' involvement may be required to assist in delivery of a comprehensive approach to flood defence.*

## Summary

Through the process of understanding the full extent of the consultation responses received from all key stakeholder groups over the six-week consultation period, a series of proposed actions have been concluded to help inform the update of the draft Development Framework to arrive at a final draft document for approval. While there is broad stakeholder support for the Development Framework and what it potentially means for the Leale's Yard site and the Bridge Main Centre generally, there are a number of issues that need review within the document, particularly in regards to clarification of information. It is worth noting that across all feedback, there were four strong recurring themes: traffic flow and parking, flood defence, public open space, and delivery.

Any amendments will need to ensure that the final Development Framework document focuses on its role and objective to provide useful and balanced planning guidance for the mixed-use development within the Leale's Yard Regeneration Area. While some of the issues raised by feedback can only be addressed by further design development and detail, the Development Framework must be able to provide support to the Planning service in the process.

Overall, we consider consultation to have been relatively successful in that we have received an overall number of 62 carefully considered responses (including the Co-op) throughout the six-week period. The final draft Development Framework will clearly be able to demonstrate a number of changes made in light of issues raised by stakeholders, and therefore become a document that should be well supported.

Detailed tables of the feedback received from each key stakeholder group has been attached as appendices, and include a detailed action list against key items of feedback.

Appendix A: Public consultation summary

Appendix B: Stakeholders and organisations feedback summary

Appendix C: Committees, Service Areas & Utility Companies (including full copy of Committees letters)

Appendix D: Deputies

Appendix E: Co-op feedback summary

## Appendix A: Public consultation summary

No. of feedback forms received (provided at drop-in):	21
No. of e-mails received:	19
<b>Total number of public responses received:</b>	<b>40</b>

note this includes two double submissions

### 1. Do you agree with the proposed Vision Statement and key principles?

(Answer tallies refer only to those who answered the question specifically)

	Yes	% of total	No	% of total	Not sure	% of total	Total no. of respondents to question
Vision statement	16	80%	2	10%	2	10%	20
Principle 1: Sustainable and delivery-led development	15	83%	0	0%	3	17%	18
Principle 2: Making good connections	16	84%	1	5%	2	11%	19
Principle 3: Open space and public realm at the heart of new development	18	90%	1	5%	1	5%	20
Principle 4: A mix of uses, community activities and housing types	16	84%	1	5%	2	11%	19

### 2. What are the three most positive things that the draft DF proposes?

	No. of responses	% of total	Key quotes
<b>The possibility of something happening to improve the area</b>	<b>9</b>	<b>15%</b>	<i>"This is long overdue! 'To improve the future you have to disturb the present!' (Catherine Booth)"</i> <i>"If done properly it would/could create a community that would increase the viability of the Bridge"</i> <i>"I give my full support to the proposed Guernsey Salvation Army Church and Community Centre new build"</i> <i>positive: "mix of uses especially community uses"</i> <i>so that "things will move forward instead of sitting there for another 10 years"</i> <i>"we would like to see ... a market square, a park, something that will lighten up the area as it is lacking on life."</i> <i>"more housing which will benefit the area"</i> <i>"Love Bridge Avenue - be great to achieve"</i> <i>"Parking to ease pressure on the Bridge", "</i>
Workspace	1	2%	
Sense of community	2	3%	
<b>Community centre, including a library facility</b>	<b>11</b>	<b>18%</b>	
Good mix of uses	2	3%	
Bringing in more visitors to area	2	3%	
Increase use of the Bridge	1	2%	
Supports phasing approach	1	2%	
<b>Public open space (e.g. a civic space)</b>	<b>11</b>	<b>18%</b>	
More retail	1	2%	
More housing	5	8%	
Affordable housing	2	3%	
<b>Good movement network, incl. a dedicated walkway</b>	<b>8</b>	<b>13%</b>	
<b>Parking moved from the Bridge</b>	<b>6</b>	<b>10%</b>	
<b>Total no. of responses to question</b>	<b>62</b>		

### 3. What are your three main concerns? How could it be improved?

	No. of responses	% of total	Key quotes
Delivery	2	3%	concern: "the Co-op's ability to deliver it", "a developer will need to be confident they can sell the development"

More houses, fewer flats	1	1%	"more housing, for locals, maybe sheltered, <b>not</b> primarily flats"
<b>Timing and possibility of it not happening</b>	<b>7</b>	<b>10%</b>	"It has to happen now", "Too long to allow planning consent", "the Vision is great - but when will it be delivered"
Ensuring housing is affordable	1	1%	
Adverse effect on current Bridge traders	2	3%	"The plan as it stands will destroy the trade on the Bridge Frontage"
<b>Parking moved from the Bridge</b>	<b>10</b>	<b>14%</b>	"I fear the removal of these parking spaces (which I consider wholly unnecessary and impractical) will be hugely disadvantageous to both shopkeepers and customers"
Flooding / high water table	5	7%	"When the sea levels rise which they will why build below the current sea walls which cannot cope, Leales yard is a farce no drains can cope with all this water"
<b>Amount of housing proposed</b>	<b>7</b>	<b>10%</b>	"The density of new housing and other building should be the minimum for financial viability."
Air pollution	1	1%	"The side effect of traffic congestion is PM2.5 pollution in our house frequently rises above 25µm/cum"
<b>Additional traffic / issues with access</b>	<b>10</b>	<b>14%</b>	"need to control traffic flow", "the plan fails dramatically to address or improve the traffic flow"
Seating/al fresco area along the Bridge	2	3%	"How much demand is there for this sort of seating and activity / amenity areas?.. I'm not against it but is it achievable?"
Risk of division into small pand parcels	1	1%	
Design of future development	5	7%	"it will be turned into a car park with houses in it", buildings "should mirror and complement existing designs in the Bridge area, and be Guernsey style buildings."
Lack of commercial pull	1	1%	
Building heights	3	4%	"Personally I would prefer nothing higher than 3 stories", NO new buildings should be high enough to be visible over the top of the existing roof line.
Too much retail inside LYRA	1	1%	
<b>Loss of open space/not enough open space provision</b>	<b>6</b>	<b>9%</b>	"I feel the public green space is not nearly big enough", "open space at the heart of the development should be ... a larger area than in the current examples"
Needs to be more focus on the locals	1	1%	"needs to focus on the needs of the locals so that it welcomes people to stay and spend time and money in the area"
Sufficient parking for residents / shopowners	4	6%	"This current lack of parking is apparent"
<b>Total no. of responses to question</b>	<b>70</b>		

**4. Do you think the draft Development Framework will support the positive regeneration of the Bridge Main Centre?**

Yes	% of total	No	% of total	Not sure	% of total	Total no. of respondents to question
12	60%	1	5%	7	35%	20

(Answer tallies refer only to those who answered the question specifically)

**5. Which of the initial options for the public realm and parking area on The Bridge frontage do you support and why?**

Option 1A	% of total	Option 1B	% of total	Option 2	% of total	Option 3	% of total	None of the options	% of total	Total no. of respondents to question
2	11%	1	5%	3	16%	10	53%	3	16%	19

(Answer tallies refer only to those who answered the question specifically)

Feedback/suggestions:	No. of responses	% of total	Key quotes
<b>Support parking kept in front of shops*</b>	<b>12</b>	<b>55%</b>	"While I admit the Bridge has a traffic problem...Taking away this parking would inconvenience [people] and probably cause the shops ...to lose business."
Extend improvements further	1	5%	"It would be good to see the public realm improvements on the Bridge extended further to include the Northside and quayside walkways"
Not sufficient space for any of the options	1	5%	
Support flood wall on harbour edge	2	9%	
<b>Support no options</b>	<b>3</b>	<b>14%</b>	"all fail to address flow of traffic and to keep the ability to 'drop in' to the Bridge"
Extensive planning needed to calm traffic	1	5%	"a lot of thought needs to be given to re-routing the traffic or at least calming it"
Improvements good for pedestrians	1	5%	Option 3 "best for community space and pedestrian comfort"
Additional option - flood wall located on road-side of harbour pavement	1	5%	
<b>Total no. of responses to question</b>	<b>22</b>		

\*note that a petition has been circulated, gaining around 500 signatures

**6. Do you agree with the Development Guidelines?**

(Answer tallies refer only to those who answered the question specifically)

Mostly disagree	% of total	Mostly disagree to agree	% of total	Agree	% of total	Agree to Strongly agree	% of total	Strongly agree	% of total
0	0%	4	24%	7	41%	4	24%	2	12%

Total no. of respondents to question
17

**7. Other comments / suggestions (including from feedback received via e-mail):**

	No. of responses	% of total	Key quotes
Lack of heavy industrial land	1	3%	"still an issue is the total lack on Heavy Industrial land and I do not think this site will provide any help with this problem"
Include a car club in parking strategy	1	3%	
Biodiversity	2	5%	"Bat and bird boxes have been mentioned and would encourage wildlife to the area"
Quantify areas for particular uses	1	3%	
Alfresco seating in LYRA not on Bridge	1	3%	" It would also be nice to have a restaurant /café with al fresco dining"
Bridge across harbour	2	5%	
<b>Relocate Co-op supermarket to within LYRA</b>	<b>3</b>	<b>8%</b>	"this would considerably enhance the leisure facility that families could enjoy on the whole of the Bridge shopping area. This would be a traffic free area."
Access through Lowlands Road	2	5%	
Would be positive to have different housing models	1	3%	"It would be great to see some different models of housing which addressed the housing need for first time buyers."
Relocate bus stop to exit of one-way at New Road	1	3%	
The Bridge shops to be accessed from within the site	1	3%	"the suggested design/s need to include at least 1 3-storey (anything higher would be seen above the buildings along the Bridge) multi-storey car park"
<b>Multi-storey carpark</b>	<b>4</b>	<b>11%</b>	
No multi-storey car park	1	3%	"This would not be appropriate, nor economically viable for an area of low land-value and this density"
Band stand to be incorporated	2	5%	
No need for flood defences here currently	1	3%	"a bandstand could be used for choir bands, local or visiting island"
Improve public transport	2	5%	
Nocq Road/The Bridge intersection currently problematic	1	3%	"need to provide free bus service"
Introduce paid parking	1	3%	
Importance of flexibility	1	3%	"Co-Op stores are empty now what next!!!!"
Food and distribution centre needed	1	3%	
<b>Salvation army church &amp; community centre should be incorporated</b>	<b>7</b>	<b>19%</b>	"I give my full support to the The Salvation Army Church and Community Centre new building on the Leale's site... indicated as Site 'A'"
<b>Total no. of responses to question</b>	<b>37</b>		

**Appendix B: Stakeholders and organisations feedback summary**

#	Organisation	Name	Date of response	Form of response	Section (or general theme)	Comment	Tibbalds' proposed action
1	Vale Douzaine	Richard Leale	29/02/2020	Conversation with Tibbalds		what is proposed within the DF doesn't reflect Guernsey	Investigate possiblity to include more precedent images of Guernsey.
						Overlooking the marina from the building-side of the Bridge doesn't make sense as the road slopes down towards the shops	Note as worth considering as part of future development of Bridge public realm improvement.
					Flood defence	Flood defence – pleased to not see something down the centre, no moveable flood barriers – the granite wall around the harbour would be favoured (previous feedback was that building atop of the existing wall would not be possible because it wasn't strong enough and the walls are porous)	Confirm with engineering consultant regarding strength of harbour wall.
					Flood defence	Favour the flood defence solution where the wall is going around Marine & General; it helps to protect the building – much simpler to build, no brainer, sufficient workforce at the boat yard to help put in barriers	No action.
					Open space	Concerns about the potential for anti-social behaviour in the hard public open space near the Bridge	Review and confirm wording regarding active frontages required around both areas of key public open space.
						No problems with what is shown on the indicative layout	No action.
					Access	Roundabout at Nocq Road/The Bridge intersection is a good idea to allow traffic to go west-to-east to prevent going up and around	Review and consider creating a list of 'issues to consider' in regards to the public realm improvements associated with the Bridge.
2	St Sampson Douzaine	Rob Gill, Andy Carre, Michael Beaumont, David Hugo, Leonie Le Tissier	29/02/2020	Conversation with Tibbalds	Building heights	Concern about 4 storeys; reassured that this is not all over the site and all buildings are subject to good quality design and ensuring no overlooking – question whether it is necessary for anything to go beyond 1-2 storeys?	Need review text to ensure it is clear that all proposals will be subject to good quality design and ensuring minimum detriment to existing buildings/residents, including building heights.
					Access	Want to ensure there is more than one main access point – don't want to create bottlenecks (general Guernsey problem)	Review text and confirm it includes the need for more than one access point into the site.
					Infrastructure	Big concern about roads and infrastructure, in particular electricity cables under the main intersection	Review and consider creating a list of 'issues to consider' in regards to the public realm improvements associated with the Bridge.
						What is fixed and what is flexible?	List of 'Key Delivery Requirements' to be included, and DF to state that as consistent with policy, future development applications will need to accord with the DF.
					The Bridge	The public would feel more supportive to see things being dealt with at the bridge first	No action.
					Flood defence	Flood defence – better that it's a comprehensive approach	No action.
					Uses	"I need somewhere nice to come and eat, there's nothing at the Bridge now"; happy for the parking to move in the site and create a nice place to wander along the front; "It'll be a nice environment to come and walk around"	No action.
					Public open space	Market area – concern that it's not covered/sheltered – could put a marquee or design a glassy pavilion so it is useable year-round	Review and consider including a suggestion for providing a covered area as part of either or both key public open spaces
3	Salvation Army	Jamie Hill (chaplin), Andrew Male (architect), Keith Tostevin	29/02/2020	Conversation with Tibbalds	Deliverability	Concern about the timeframe and if there will continue to be delays in development the site; the Salvation Army team are of a demographic that are keen to see something going asap	No action.
					Image 7.6	Suggest on image 7.6 'Community use' added to Site A? Salvation army hoping to take the corner building as it is a prominent location	Review and consider adding additional use category to Framework plan; however this plan may be removed from the DF to clarify that there are no fixed locations for particular uses provided they accord with the Development Guidelines and Key Delivery Requirements.

					Section 7.1	'Comprehensive' development needs to be more well-defined within the DF to explain what this means	Review and consider amending text it not clear enough.
					Section 7.13	Phasing to be considered carefully	No action.
						Provide more guidance within the Leale's Yard Regeneration Area for what design guidelines are encouraged outside the Co-op ownership (i.e. the existing Salvation Army building is likely to come up for sale, so what are the guidelines for what could happen to the site?)	Review Development Guidelines section to ensure that guidance is relevant to the full Leale's Yard Regeneration Area.
4	Youth Commission	4x members of the Youth Forum, varying from Year 9 to 6th Form	28/02/2020	Workshop with Tibbalds	Section 4	<p><i>What do you like and dislike about the Bridge Main Centre?</i></p> <p><u>Dislike</u></p> <ul style="list-style-type: none"> <li>-Run down shops</li> <li>-Not much to do</li> <li>-Feels unsafe at night time because of people hanging around</li> <li>-Delancey Park at night</li> <li>-Not a wide variety of shops e.g. friendly café (not enough interest?)</li> <li>-Unclean water in harbour</li> <li>-Nowhere to sit</li> <li>-Lots of road signs</li> <li>-Vague, unattractive</li> </ul> <p><u>Like</u></p> <ul style="list-style-type: none"> <li>-Thai takeaway, Atan</li> <li>-Vale Castle (and events held there)</li> <li>-School of Popular Music (Music Studios) – delancey park</li> <li>-Church of rock band practice – summer school</li> <li>-Café 'Bright Beginnings' – nice community feel</li> <li>-Bordeaux beach nearby (underutilised)</li> <li>-Youth clubs</li> <li>-Harbour</li> </ul>	Review and consider including text within Chapter 4. Site context and surrounding area to state young people's feeling of the area, particularly within under uses and facilities, i.e. "There are a number of facilities that cater to younger people, including.. however, there is a general feeling that there is not much to do" and "due to the lack of uses open in the evening, there is a lack of passive surveillance in the area leading The Bridge to feel unsafe." This is issue is not particular to young people.
						<p><i>If you could design the new Leale's Yard, what would be in it?</i></p> <ul style="list-style-type: none"> <li>-Boxpark-style cafes/restaurants</li> <li>-Lots of green space – and biodiversity improvements, including educational boards and nature trails</li> <li>-Pond /water</li> <li>-Places to ride your bikes</li> <li>-Big greenhouse (like Kew Gardens)</li> <li>-Covered outdoor area</li> <li>-Trampoline park</li> <li>-Cinema</li> <li>-Café/restaurants</li> <li>-Shops that could help give job opportunities to young people and plastic-free shops</li> <li>-Open BBQ area, community benches</li> <li>-Want to encourage active movement but also mindful about disabled access</li> <li>-Allotments</li> <li>-Bike rental (like Boris bike system)</li> <li>-Community uses – health clinic, cooking school, dance classes</li> </ul>	<p>Review and consider where uses more targeted to young people could be integrated; add under Landscape and biodiversity development guidelines that educational boards and nature trails could be included within the area of public open green space. Include text on community facility which encourages uses targeted towards young people (as well as others).</p> <p>Review and consider adding text to include the potential for 'leisure' uses to be included on site.</p>
5	Health Improvement Commission	Alun Williams	29/02/2020 06/03/2020	Conversation with Tibbalds and via e-mail		Advocate for "Making the Bridge a healthy and sustainable place to live" which would align with other government policies such as the Partnership of Purpose the Children and Young People's plan and the States Resolution on Health in all Policies. Current health statistics for Guernsey include that 56% of residents are overweight or obese.	Review and consider whether wording communicates the importance of creating a healthy and sustainable place to live; potential to link to other govt policies.

					Public open space	Putting opportunities for children and families to be active should be a priority and development of both formal and informal open spaces should be designed for 'play'; physical activity is as important for physical health as well as mental health.	Review and consider how 'play' and opportunities for play have been highlighted within the relevant Development Guidelines.
						Worth embedding a principle about 'healthy lifestyles' – make it more explicit, potentially within Principle 2: Making Good Connections; connections are not just about getting from A to B but about the benefits of doing so easily and attractively; if convenient active travel opportunities are integrated within the new development, people will more likely undertake physical activity as part of their daily routine.	Review and consider amending Principle 2 from 'Making good connections' to 'Encouraging healthy lifestyles', which likewise talk about convenient connections
					Image 7.20	Like the look of the modern houses and the elevated walkways	No action.
					Movement and public open space	HIC facilitating the provision of "Bike playgrounds" around Guernsey – for people to practice biking (Summeray park and two at schools provides a 100m stretch; supported by Guernsey bicycle club); also encourage the idea of circular loop tracks for running, or other community-based activity tracks	Review and consider including this as a suggestion within section on public open space.
					Parking	Needs to be a balance between providing parking and encouraging active travel	No action.
					Uses	Could the DF encourage more healthy eating opportunities on and nearby the site; fast food/takeaway outlets should not be within close proximity to schools in particular	Review and consider if this could be mentioned as a recommendation under Uses or Sustainability.
6	Guernsey Housing Association (GHA)	Steve Williams (Chief Executive)	27/03/2020	Via e-mail	Support for the site's development	very keen to see the Leales Yard site developed - particularly as it is: a very large strategically located brownfield site; Derelict site for decades; Holding back The Bridge economically and socially by staying as it is; and adversely affecting the second largest retail centre in the island	No action.
					Affordable housing	Guernsey Housing Association (GHA) is naturally very supportive of affordable housing on this site... GP11 needs to ensure it applies to the whole site. The DF needs to avoid the site being broken down into parcels where the GP11 condition applies to each individual parcel say of under 20 dwellings in order for developers to avoid providing any affordable housing.	Review and consider amending text to include this point in regards to comprehensive development and the affordable housing policy.
					Density	The Leales Yard site suits a reasonably high density residential development of mainly apartments, ideally with access to private patio's for ground floor accommodation and balconies for those above ground.	Review text to ensure the need for private open space has been included.
					Viability	The project viability test needs very careful attention... hence the appended information does not give sufficient detail to appraise the real viability of the options.	Need to include text in an appropriate location to say that the AspinallVerdi report as part of Appendix 5 is <u>not</u> the viability appraisal, but baseline information.
					Section 4.5	it is noted that there is reference to using an infiltration drainage, which we use on all our sites as a SUDS system which is normally very effective. However the Leales Yard land is low lying, with a high water table and the effects of the sea tides, hence this land is unlikely to drain quickly through filtration.	The consultation response from the States Trading Supervisory Board includes the statement "Guernsey Water would encourage any developer to look at sustainable drainage systems (SUDS)", and further detail regarding Surface water drainage guidance within Development Guideline 7.6. This will be incorporated as part of responses to Committees, Service Areas & Utility Companies.
					Flood defence	A sea defence design for the whole of the Bridge to be agreed and funded could take years which will mean the Leale Yard scheme will be delayed as no funder will agree to finance the Leales Yard development without a sea defence plan in place. To move the Leales Yard project forward it needs its own sea defences created whilst the whole of the Bridge sea defence is agreed.	There is already a workstream set up and funded for this - albeit recent developments may have an impact, there is a very strong argument that this project will remain a States priority and will come forward in the near future. It is a reasonable position to require clear measures for flood protection to be in place before allowing development in such high risk areas. A comprehensive solution is needed for the Bridge otherwise defending just the main development site will worsen the impacts of any flooding on their neighbours. Review whether relevant text in DF needs additional clarification as above.

					Flood defence	As regards the Bridge sea defences the Option 3 is the only logical way forward but retaining as much of the Bridge frontage parking as possible. Options 1 and 2 will sacrifice the road to be flooded.	No action.
					Section 4.7	we agree it is beneficial to the local community to promote people to walk and cycle and would propose that these permeability links are created through the Leales Yard design through to the Lowlands Estate to allow cyclists to enter Braye Road thereby avoiding the busier Vale Avenue.	No action.
					Section 4.8	currently the Bridge is a very hard urban landscape of roads, paths and buildings with very limited green vegetation to soften the area. It would be beneficial to introduce landscaping along the Bridge. We agree the parking could be designed more attractively, potentially with some tree planting to break it up, and tackle the poor junction outside Ray & Scott's shop but otherwise keep as much parking as you can to ensure the businesses that have survived so far remain in business. Hence we are not supportive of the design options which remove the majority of parking along the Bridge.	Review wording regarding the Bridge public realm improvement options to clarify the diagrams provided within the DF are indicative only, and would require further development as part of a separate workstream carried out by E&I.
					Section 6.5	The north of the island does not have many decent quality places to eat out and hence it seems a good opportunity to allow planning class use wise for a café/restaurant ideally at first or second floor level with views over the marina located at the north east corner of the site.	Tibbalds to consider.
7	Guernsey Community Foundation	Wayne Bulpitt (Chairman)	27/03/2020	Via e-mail	Section 7.7	We are pleased to see the general provisions proposed for community use and, in particular reference at 7.7 to existing groups and users. As you are aware, GO Communicate presently operate their successful Recycle Reuse retail and workshop facilities from premises within the development area (and specifically highlighted as the best access point).	No action.
						In separate discussions with Planners by GO and other similar social enterprise/training/supported employment such as GROW, challenges are presented within current planning guidelines as they fall between community/education & training/retail/light industry, as a consequence, finding suitable premises is often a challenge.	Tibbalds to review and consider the inclusion of text within 7.7 to cover less conventional combinations of uses, potentially using the example of GO Communicate.
						Accordingly, the Leales Yard redevelopment presents an excellent opportunity and we ask that more specific reference be considered for inclusion in the planning brief to cover the existing uses of the space occupied by GO and summarised above. We consider that this has a number of benefits, notably; a) Consistent with objectives and highlighted priorities of the planning brief as drafted; b) Recognises the unique mix of uses and benefits that these services provide and have proved difficult to locate elsewhere. c) Supports the environmental objectives through partnership within the Recycle Reuse initiative, for which there is significant opportunity to expand with the right facilities to support. d) From a developer/ perspective, could be recognised as part of the other community provisions within the development brief to provider a lead community partner, making it more practical to deliver.	Refer above.
8	La Societe Guernesiaisie	Jamie Hooper	14/03/2020	Via e-mail	EIA	As the site is significantly larger than the 1 hectare threshold for an EIA and is known to support natural and semi-natural habitats, rare species of bats, a high density of slow worms and other wildlife, much of which may be under-recorded due to the inaccessibility of the property, we would strongly recommend that an EIA be made a requirement for the area.	Noted, however the DF can only refer to the screening opinion required to evaluate the need for an EIA.

					<p>Section 6.2 We would also like to suggest that an additional principle be added to Section 6.2. The Vision for the Leale's Yard Regeneration Area and provide a suggested draft as follows:</p> <p><b>*Principle 5: Supporting Local Biodiversity</b>  A need to protect and enhance current habitats and wildlife where feasible and to provide new opportunities to support additional biodiversity within the new development. The Leale's Yard Regeneration Area supports a range of habitats, plants and animals, much of which has become established over time as a result of the site falling into disuse. A development strategy should recognise the site's contribution to nature conservation within the urban landscape and seek to protect existing wildlife where possible. Opportunities to encourage additional wildlife through the creation of new areas of natural habitat and other green space should also be considered. Developers are encouraged to include various specific measures to support biodiversity, such as extensive planting of native trees, shrubs and hedging across the site and the provision of bird boxes, bat boxes and other wildlife features.</p> <p>The overall objective of this principle is to achieve a net ecological gain for the area in the long term. This will have the added benefit of contributing to the general wellbeing of the community.'</p>	Tibbalds to review and consider inclusion of a new Vision principle, or alternatively consider how this priority can be communicated through the Development Guidelines.
9	Guernsey Chamber of Commerce	David Falla	28/03/2020	Via e-mail	"We recognise the benefits of a well planned spatial strategy for the area such as is shown in this Draft Development Framework and also that consideration is given to the ability to meaningfully redevelop the area in phases."	no actions to take
					Flood defence Consideration should be given to what can be done without and in addition to flood prevention measures put in place by States of Guernsey - "Much could be achieved by the consideration of raising levels within the site with imported inert fill where buildings are constructed to make construction easier" - would be better than disallowing bedrooms at ground floor level, concern of properties losing value and becoming uninsurable if repeatedly flooded	Review text and consider amendment where necessary
					Parking Proposals to move parking provision from the Bridge "not convincing on the Draft Concept Plan" - no parking solutions should be excluded from consideration at the moment as "as innovative options will be available at a more detailed building design stage", and it will be vital for successful solution to include an easy link to the Bridge retail from displaced car park spaces	Review text and consider amendment where necessary
					Integration with the Bridge <b>Connection of the Bridge to Leale's Yard</b> - "The Vision concept plan does not demonstrate a good retail and leisure connection to the Bridge" - move community use to Block A and designate area behind the Bridge (current block E) as retail to encourage successful retail/commercial zone where existing Bridge and new retail support each other	Review text and consider amendment where necessary
					Uses DF should include "possibility of locating future uses on the site that cannot necessarily be foreseen at this moment in time", eg university complex/marine research facilities/art gallery - emphasis on 1/100 year opportunity	Review text and consider amendment where necessary

## Appendix C: Committees, Service Areas & Utility Companies feedback summary

(Committees letters included in full following this table)

Response number	Organisation	Name	Date of response	Comment	Tibbalds' proposed action
1	Property Services	Graeme Falla	26/02/2020	Issue with wording in Appendix 5 2.2 and 2.3	Review and consider amending wording as per letter; however full appendices may not be included as part of the final DF
2	Policy & Resources Committee	Deputy L S Trott	25/03/2020	Support balance of uses and potential for improved connections (creating balance between pedestrians, cyclists and vehicles) between future opportunity sites and provision of open space	No actions to take
				Concern about extra demand on local infrastructure and any cumulative impacts from surrounding development.	Review and confirm whether Traffic Impact Assessment requirement is in text
				Flood defences need to be carefully considered, suggests review of options	Review text; revised text regarding options on flood defence / public realm at The Bridge will need to note that these are indicative proposals only and further studies will need to be undertaken to develop a scheme which takes into account all technical and design considerations
				Emphasis on need to maintain flexibility to support viable development - concern about the requirement for infrastructure to be completed first, urges to consider phased approach	Review and consider wording regarding the 'infrastructure-first' approach; amend to place emphasis on the requirement for a comprehensive and well co-ordinated strategy
				<b>Appendix 2</b> - the Committee will explore range of options for States' involvement (not just CICS presented option)	Review and consider amending wording as per letter where necessary
				<b>7.1</b> Committee supports engagement on appropriate legislative amendments regarding Outline Planning Permission	No actions to take
				Open space requirements should be more heavily emphasised as minimum requirements, should encourage maximum provision	Minimum requirements to be included as part of Key Delivery Requirements
				Emphasise that this is an opportunity for innovative design solutions (eg elevated structures above flood attenuation)	Review and consider how text could communicate the opportunity for innovative design (potentially within development guidelines on sustainability, however needs to be balanced with other requirements)
3	States' Trading Supervisory Board	Deputy Peter Ferbrache	03/04/2020	<b>5.2</b> Amend statement on Japanese Knotweed - onsite management is required, developer should employ qualified specialist to oversee Knotweed Management Plan	Amend wording on JK; also provide guidance in Development Guidelines section
				<b>7.2</b> Introduce concept of minimising waste at design stage	Review and amend text

				7.6 Surface water drainage - appropriate permissions must be sought, Guernsey water encourages use of SUDS, additional surveys will be required *see letter for details	Review statement on drainage
				7.6 Services and utilities comment on foul water rising mains/flows *see letter for details	Review statement on potable and foul water
				8 Contaminations and remediation second para needs redrafting, consider the following: 'There is historic evidence of contaminants entering St Sampson's Harbour via surface water drainage. A full site investigation to identify the location and extent of hotspots will be required. With limited disposal routes available for contaminated spoil, consideration should be given to on-site/in-situ remediation measures, and potential on-site containment within the development.'	Review and amend sentence
				8 Site waste management framework: last sentence should read: "Stone, concrete, bricks, and other inert materials arising from removal of existing hardstanding surfaces, below ground infrastructure, and building demolition will be processed on site to meet appropriate standards for recycled aggregates for use as structural fill material required for the development."	Review and amend sentence
4	Committee for Health & Social Care	Deputy Rhian Tooley	23/03/2020	Importance of accessible community facilities, and supports inclusion of community space and considers the proposals appropriate	No actions to take
				Housing provision - Committee recognises importance of housing and also that there is a balance between supporting amenity value and plot density	No actions to take
5	Committee for the Environment & Infrastructure	Deputy B L Brehaut	06/04/2020	<b>Housing</b> - Committee supports mix of type/tenure/size	No actions to take
				"should give more emphasis to the need to design dwellings carefully to mitigate flooding from the outset whilst also designing for the specific needs of potential occupants"	Review and consider amending wording; recommendations within the Development Guidelines encourage use of SuDS and highlights the potential risk issue regarding ground flood bedrooms and flooding
				"consideration must be given to the housing requirements set by the States Strategic Housing Indicator (SSHI)"	Review and ensure reference to SSHI included in discussion of housing provision
				<b>Bridge Strategy</b> - "pleasing to note that the draft Development Framework acknowledges the need to consider the impacts of developing the site on the wider Bridge area"	No actions to take
				Bridge options will be part of wider piece of work - "it would be useful if the draft Development Framework were clearer that the options contained within it are indicative and do not represent firm proposals"	Review text and labelling to ensure communication of options is indicative and high level only, with further development to be undertaken separately and with full account of all technical issues
				<b>Public realm and open space</b> - "welcomes the draft Development Framework clearly outlining the significant opportunities "	No actions to take
				Minimum requirements useful but should emphasise they are minimum and "the expectation should be that larger public spaces will be provided"	Review text and consider amending key delivery requirements to state 'minimum'
				"The use of flood attenuation measures as suggested in the draft Development Framework should be encouraged"	No actions to take
				<b>Travel and transport</b> - positive that DF includes "an appropriate mix of services and facilities on site that should minimise the need for residents living in the immediate area to travel by car" and may reduce need for some to travel to Town	No actions to take

				Positive that walking and cycling prioritises, and east-west pedestrian/cyclist route a good connection	No actions to take
				Emphasis on requirements of policy GP 9 of IDP "development in the Main Centres will be expected to make provision for facilities that will assist in people being able to commute by bicycle, motorcycle or on foot" (see letter for more detail)	Review text and add reference where necessary
				"pleasing to note that it states that all pedestrian routes must be continuous and accessible to all"	No actions to take
				"requested that clear reference is made to the need to provide bus stops as close to key areas as possible"	Review text and add reference where necessary; however new bus stops are unlikely to be provided within the Regeneration Area
				"pleased to note that the draft Development Framework states that consideration should be given to supporting infrastructure for renewable energy such as electric vehicle charging points"	No actions to take
				"Provision of an access that caters for all road users onto Lowlands Industrial Estate, if achievable, would be welcomed."	This access point has been updated as vehicular on diagrams in response to the landowner's feedback on the draft DF.
				"it is considered important to promote a strong ethos of the site being a limited car ownership development"	Review text and add reference if necessary; however the text and guidelines aim to support active travel as much as possible; it is noted that consultation feedback on this issue from the public demonstrated the very car-dominant nature of Guernsey generally and therefore the shift towards active movement needs to be done with care and consideration
				On reduction of parking on the Bridge: "The Committee recognises that, a balance must be struck between providing adequate parking and the removal or relocation of spaces to make public realm improvements. "	No actions to take
6	Fire Safety	Martin Lucas	20/03/2020	New premises of 4 storeys and above may require sprinkler protection (see email for details on sprinkler systems)	Review and include reference to Fire Safety requirements as a consideration
				New premises designed to include retail and residential may require protection by commercial sprinkler system	Review and include reference to Fire Safety requirements as a consideration
				Water supplies for sprinkler systems must be guaranteed by Guernsey Water - Guernsey Fire & Rescue 'would consider this proposed arrangement to be a guaranteed supply for the purposes of sprinkler provision" (see email for details on supply)	No actions to take
				Road widths seem to comply with normal requirements for Water Tender access (see email for detail) however if development includes 6 storey buildings then 'High Reach or Turntable Ladder access is required" (see letter for details on minimum widths and road carrying capacity)	Review and include reference to Fire Safety requirements as a consideration
				Tree lined avenues would also prevent operational use of a Turntable Ladder	Review and consider including reference to technical guidance, however encouraging balance between the provision of street trees and technical requirements based on a significant amount of feedback on the importance of open space and concern over loss of trees and biodiversity
				Recommends all buildings on site maximum 5 storeys so normal Water Tender access requirements can be met (13.5m ladder can reach 4th floor)	Review and include reference to Fire Safety requirements as a consideration
				Further email correspondence with Cathy Regan, Principal Building Control Officer, highlighting information in Guernsey Technical Document C.8 on Flood Risk mitigation and noting there are no restrictions on ground floor bedrooms	Noted

7	Guernsey Electricity	Paul Le Tissier	26/03/2020	Support Salt pans and Leale's Yard Frameworks	No actions to take
				List of provisions that will be required (ed laying of cables, distribution pillars and substations)	Review and consider including reference to requirements to enable service of electricity to the site
				GE are prioritising supply via 100% renewable resourced cable and diesel generation for top up - "whilst monitoring and complying with regulatory requirements; emission, noise and vibration should not have any unacceptable effect on these developments"	No actions to take
8	Committee for Employment & Social Security	Deputy M Le Clerc	18/03/2020	Pleased to note draft DF "emphasises the need for a range of type, tenure and size of housing units on the site"	No actions to take
				"The Committee is encouraged that the draft Development Framework specifically states to contact Housing at the earliest opportunity to discuss the housing requirements for the site"	No actions to take
				"the Committee would like the Development Framework to more clearly emphasise that the site's requirements under Policy GP11 will be calculated based on the size of the development site as a whole, not on the size of separate phases or parcels" - needs to be included in reference to Master Developer, would like section 7.1 amended to include this point as one of the minimum items to be set out for the main development site	Review 7.1 and amend where necessary; also to be added within Key Delivery Requirements
				"encouraged to see the emphasis throughout the draft Development Framework on open space and improvements to the public realm quality in the surrounding area"	No actions to take
				Includes an appendix (letter to Policy & Resources Committee) with details on affordable housing	No actions to take
9	States Archaeologist	Dr Philip de Jersey	06/03/2020	Factual error - protected monument shown on image 4.13 within LYRA	Error corrected
				4.10 History of site as infill of Braye du Valle and more recent uses "makes it likely that small archaeological test-pits of the kind we would normally excavate will be of little purpose here" - so would not expect to carry out this type of work prior to development - however there may be archaeological deposits at greater depth and best way to identify these would be to "maintain a watch brief on aspects of the development which are most likely to expose any remains" and this could be recommended in the development brief	Review text and add requirement for watching brief as necessary
10	Office of Environmental Health and Pollution Regulation	Cathy Rirsch	11/03/2020	Issues of concern on the site (expects all of these 'can be alleviated through planning conditions being attached to a consent'):	No actions to take
				Potentially contaminated land (including areas of Japanese Knotweed)	Text will be reviewed and amended against STSB response
				A Construction Environmental Management Plan (CEMP)	No actions to take - requirement for CEMP included in text
				Noise impact and ongoing controls	Text is included regarding the requirement for an EIA.
				Lighting assessment and impact	Text is included regarding the requirement for an EIA.
				Air quality impact	Text is included regarding the requirement for an EIA.
				Details on the site waste management plan would be required	Text is included regarding the requirement of a site waste management plan

				As an Environmental Impact Assessment will be required to be submitted many of the above matters will be considered	Text is included regarding the requirement for an EIA.
				'Specific details on how community spaces would be used and the commercial and retail units I would hope to be provided at the planning stage. This would be to ensure that any necessary conditions could be attached to control potential nuisances affecting any residential properties'	Review and consider amending text to require detail at planning stage (if not already a standard requirement)
11	Guernsey Gas Company Limited	Andrew Robinson	01/04/2020	There are reasonable sized LP mains' existing, 'there would no doubt be some spare capacity' - a network analysis would be needed to quantify the capacity and whether any reinforcement would be needed to supply the development	Review and update to include status of gas mains.



The President  
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25<sup>th</sup> March 2020

Dear Deputy Tindall

## **Leale's Yard Regeneration Area – Draft Development Framework**

Thank you for your letter dated 18<sup>th</sup> February 2020 seeking the view of the Policy & Resources Committee (“the Committee”) on the draft Development Framework for the Leale's Yard Regeneration Area (“LYRA”). Having considered the draft Development Framework and its Appendices, the Committee is of the view that information presented in the current draft provides highly valuable information and as such the Committee's decision to pause its own work stream until the guidance in the Development Framework may be taken into account has been reaffirmed.

The following comments reflect the Committee's mandated responsibilities, including its role in the co-ordination of the work of the States and advising on the implications of committees' proposals, as well as considering the policy areas within the Committee's own mandate.

### **Policy context**

The Committee is pleased that clear consideration appears to have been given to the existing strategies and policies of the States of Guernsey in the preparation of the draft Development Framework. The consultation recently undertaken by the Committee was focused on how the development of the site may support the States' overarching policy priorities as set out in the Future Guernsey Plan, as this is fundamental to the Committee's work to consider the potential for States' involvement in the delivery of development, as directed by the States<sup>1</sup>. In having regard for the same policy priorities, the Committee is hopeful that the Development Framework as drafted will encourage the maximisation of public value and benefit of the potential development.

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<sup>1</sup> [Article VI of Billet d'État No XIII of 2019](#)

Similarly, the Committee is pleased that the proximity of the nearby Key Industrial Areas, Harbour Action Area and Housing Allocation Sites have been taken into account to ensure that future plans for the LYRA may support the delivery of an optimal balance of uses in the area and offer opportunities to better connect these sites with the amenities on the Bridge. However, the Committee is also mindful that the potential cumulative effect of the development of these sites could place significant additional demand on the local infrastructure. It is noted that a Traffic Impact Assessment would be required for any proposals for the development of the LYRA, which would need to consider the cumulative impacts of development in the surrounding area. Notwithstanding, the Committee feels that an internal review may be beneficial to assess the overall impact on the local infrastructure as a result of the potential development of these sites, which are designated in the Island Development Plan. It is proposed that this may form a valuable part of the evidence base which the D&PA is required to consider as it undertakes the five year review of the Island Development Plan, particularly in terms of the supply of land for housing and employment uses.

The St Sampson's Harbour Action Area, which overlaps with the LYRA in the vicinity of the Core Retail Area, also falls within the programme established to enhance the eastern seaboard. That work is being undertaken by the Seafront Enhancement Area ("SEA") Steering Group, led by the Committee. The long-term development strategy, which the SEA Steering Group is preparing, will look to identify deliverable opportunities for the enhancement of Guernsey's east coast. The Committee notes that the Island Development Plan sets out requirements for the Harbour Action Areas as well as the Regeneration Areas, all of which seek to maximise the positive potential of the area to deliver the economic, social and environmental objectives of the States of Guernsey through a co-ordinated approach to development.

The proposed Development Principles in the draft Development Framework demonstrate significant alignment and crossover with the statements of intent published by the SEA Steering Group. These include the potential for mixed use development; the provision of open space; improving the accessibility and connectivity of the Main Centre Inner Area; creating a balance between pedestrian, cycle and vehicular activity; and provision of infrastructure to protect from coastal flood risk. The Committee is therefore confident that development that may come forward in accordance with the Development Framework, as currently drafted, would not prejudice the outcomes or implementation of a future Local Planning Brief for the St Sampson's Harbour Action Area.

An aspect which must, however, be considered particularly carefully and which is relevant to both the Harbour Action Area and the LYRA is the provision of infrastructure to defend against coastal flooding. The Committee notes that the Committee *for the Environment & Infrastructure* has paused work in relation to the coastal flood risk at the Bridge Main Centre, in light of the potential for the development of the LYRA to form part of a comprehensive solution which will also consider public realm and circulation improvements. The Committee recognises that in taking this approach, there may be the opportunity to deliver a more effective and efficient solution, and would reiterate its previous comment regarding the need to manage the potential increased demand on the local infrastructure. The Committee therefore considers that there is merit in reviewing the options for flood defence as part of a wider redesign of the area afforded by the development of the LYRA, as proposed in Appendix 4 to the draft DF.

Under the current operating model for Estates Optimisation<sup>2</sup>, the Policy & Resources Committee has responsibility for establishing policies for overall service delivery and property location. At present, the Committee is not actively considering the potential to establish or consolidate States' premises at the LYRA, but recognises that a development at this location may offer opportunities to support the objectives of the Estates Plan<sup>3</sup>. There does not appear to be anything in the draft Development Framework which would prejudice consideration of this in due course, if considered appropriate.

### **Delivery of development**

As the Development & Planning Authority is aware, the Committee has been directed by States' Resolution to undertake consultation with States' Committees and the principal landowner within the LYRA, and to report to the States with recommendations to enable the progression of development at the site, including consideration of States' involvement in the delivery of the development, if appropriate, including consideration of incentives and mechanisms to facilitate the development of the site and the funding of the same.

The Committee recognises that the draft Development Framework seeks to balance the strategic priorities for the area with the need to allow for commercially viable and deliverable development within the guidelines it sets out. The Committee is pleased that the Development & Planning Authority has given consideration to the commercial aspects and that an indication of what may represent an optimal mix and balance of uses is available for the consideration of the principal landowner and potential investors.

However, the Committee wishes to emphasise the need for the Development Framework to maintain sufficient flexibility to support the viable development of the site in the long term, which may require aspects of the development to adapt based on changing needs, opportunities or market conditions. In this regard, there is some concern that the requirement for the infrastructure to be completed first may present a barrier to longer term flexibility, as well as requiring significant investment to unlock the potential of the site in the first instance. Whilst acknowledging the need for the infrastructure for the site to be designed in a comprehensive manner, the Committee would ask the D&PA to consider the opportunity for the infrastructure to be delivered in a phased approach whilst ensuring that other requirements, for example relating to access and the provision of open space, may still be met.

In Appendix 2 there is reference to the Committee's work stream as well as the proposals presented by the Channel Islands' Co-operative Society as principal landowner, where the Committee would wish for further clarification in the document. The CICS has presented one option for States' involvement, which is linked to the initial scheme it had developed in the absence of a Development Framework for the LYRA. However, the Committee intends to explore a variety of options for potential States' involvement, and will consult with the principal landowner as part of that process, once the approved Development Framework can be taken into account.

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<sup>2</sup> [Article VIII of Billet d'État No XVI of 2018](#)

<sup>3</sup> <https://www.gov.gg/SOP>

As set out in section 7.1 in the draft, the Committee understands that there is currently a potential legal barrier to the use of Outline Planning Permission as a mechanism to deliver development under a phased approach. Understandably, there is a need to address this issue in order to enable the progression of development at the site, which is also relevant to the Committee's parallel work stream. Therefore, while a preferred solution has not yet been proposed by the Development & Planning Authority, the Committee would welcome engagement in respect of appropriate legislative amendments which would remove this potential barrier to development coming forward.

### **Open space**

The Committee recognises that the draft DF seeks to ensure that adequate public open space is incorporated into any future proposals for development of the LYRA, in the form of civic and green space, as well as incorporating measures to address the high risk of flooding at the site. Notwithstanding, the Committee wishes to make the following observations for consideration as the DF is refined.

With regard to the proposed requirements for at least 1,500m<sup>2</sup> of green space and 500m<sup>2</sup> urban space, the Committee feels that it should be more heavily emphasised in the DF that these would be the minimum acceptable standards. This is a unique opportunity to provide high quality open space in the heart of the Bridge Main Centre, and the public engagement so far serves to demonstrate the strength of feeling within the community that this opportunity should not be missed. The Committee feels that the DF should therefore encourage developers to maximise the provision of public space as far as possible.

As set out above, the Committee remains mindful that an appropriate balance will need to be found between providing open space, some of which may be necessary to mitigate the risks of flooding, and maintaining overall viability of the development. The Committee views this as an opportunity for developers to seek innovative design solutions which may simultaneously meet social, environmental and economic objectives, for example the potential for elevated structures above flood attenuation areas to maximise the usable space while addressing the pluvial flood risk.

### **Closing remarks**

As a final comment, the Committee would like to express how pleased it is with the collaborative approach taken to preparing the Development Framework for the LYRA, with key stakeholders, the States and the public having had the opportunity to contribute to the preparation of the draft, as well as being consulted on the draft once published. It is hoped that this will be noted as an example of best practice for the preparation of documents of this type.

Yours sincerely



**Deputy L S Trott**

Vice-President

Policy & Resources Committee

The President  
Development & Planning Authority  
Sir Charles Frossard House  
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3 April 2020

Dear Deputy Tindall

**Leale's Yard Regeneration Area Draft Development Framework**

Thank you for your letter of 18<sup>th</sup> February 2020, seeking the States' Trading Supervisory Board's (STSB's) response to the Leale's Yard Regeneration Area Draft Development Framework. Our comments on the document are set out below, in relation to the un-incorporated Trading Assets: Guernsey Harbours, Guernsey Airport, States Works, Guernsey Water, Guernsey Waste and the Guernsey Dairy.

**Section 5.2 Potential contamination, invasive species and site condition**

With reference to Japanese Knotweed (JKW), the following statement requires amending as it does not comply with new guidance on managing JKW:

*"Japanese Knotweed, an invasive species, has been located on site and would also require careful removal to ensure prevention of further seeding."*

New guidance has been drafted and is close to being published. With no disposal route available for soil containing JKW rhizome fragments and crowns, on-site management of JKW is now required, including in-situ treatment over a minimum two growing seasons. Any disturbance of land containing JKW will require careful consideration, and a developer should employ an appropriately trained and qualified specialist to develop and oversee a Knotweed Management Plan (KMP). Wherever possible JKW should be managed and treated on the site where it is found to minimise the risk of spreading it to other areas of the island. The current land owner should be encouraged to commence control measures sooner rather than later.

**Section 7.2 Sustainable development opportunities and requirements**

The concept of minimising waste at the design stage should be introduced here.

**Section 7.6 Site levels, flood risk, services and utilities**

**Surface water drainage**

Surface water drainage must either all be dealt with on site or discharged to sea. If the developer wants to discharge all or some of the surface water to sea, then appropriate permission must be obtained from The Office of Environmental Health and Pollution Regulation and Guernsey

Harbours. Consideration must be given to the design of any drainage system that discharges to sea specifically as to whether a pumped system is needed (to avoid being tide locked) or whether storage on site will be used.

It is recommended that any estate road paving be permeable. Guernsey Water would encourage any developer to look at sustainable drainage systems (SUDS).

It will be necessary to survey and potentially renew the surface water stream system that traverses the site which would be the responsibility of the land owner. This system takes continuous flows and is a critical part of the surface water infrastructure for the area and therefore Guernsey Water must be consulted and approve of any proposed changes.

### **Services and utilities**

Guernsey Water has two foul water rising mains that traverse the site therefore consideration should be given as to how these will be protected both during and after constructed.

All foul water flows from the site must enter into the foul sewer system along The Bridge, St Sampson's. Any proposed foul drainage system has to be approved by Guernsey Water and should be adaptable to increased flows as the site is further developed.

The main potable water connection to the existing mains infrastructure will need to be made from The Bridge, St Sampson's. There is sufficient capacity within the network and any developer should allow for a water system designed for pressure of around 7 bar (71 metre head). Fire sprinkler systems must be independent of the domestic water supply system for all units and Guernsey Water recommends that break tanks are installed.

## **Section 8 Waste and Environment**

### **Contamination and Remediation**

The second paragraph under this heading needs redrafting as it is not clear what the intentions of this paragraph are:

*"Based on evidence, updated as necessary, will need to be developed need to be developed as part of the comprehensive site wide strategy for the main development site to effectively deal with contamination hotspots, protect human health and the potential environmental receptors."*

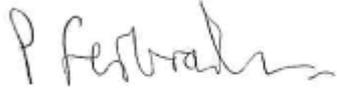
As the site is known to contain contamination hotspots this section could be stronger. There is historic evidence of contaminants entering St Sampson's Harbour via surface water drainage. A full site investigation to identify the location and extent of hotspots will be required. With limited disposal routes available for contaminated spoil, consideration should be given to on-site/in-situ remediation measures, and potential on-site containment within the development.

### **Site Waste Management Framework**

The last sentence in the third paragraph in relation to recyclable materials should read:

“Stone, concrete, bricks, and other inert materials arising from removal of existing hardstanding surfaces, below ground infrastructure, and building demolition will be processed on site to meet appropriate standards for recycled aggregates for use as structural fill material required for the development.”

Yours sincerely

A handwritten signature in black ink, appearing to read "P Ferbrache". The signature is written in a cursive style with a long horizontal flourish at the end.

**Deputy Peter Ferbrache**

President

States' Trading Supervisory Board

Deputy D Tindall  
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23 March 2020

Dear Deputy Tindall

### **Leale's Yard Regeneration – Draft Development Framework**

Thank you for your letter of 18<sup>th</sup> February 2020 seeking the views of the Committee *for* Health & Social Care in respect of the Leale's Yard Regeneration – Draft Development Framework.

The relationship between health and the built and natural environments is clear and the Committee recognises the important role that Draft Development Frameworks can play in ensuring that new developments are designed, constructed and managed in ways that improve health and reduce health inequalities.

The Committee wishes to make the following observations in response to the specific aspects that you highlighted:-

- **Existing community facilities and the potential for further facilities or potential community hub within the Regeneration area**

The accessibility of community facilities plays an important role in encouraging both physical activity and social interaction and cohesion. Access to green spaces and leisure facilities, support for active transport systems and a good range of local services all play a role in reducing health inequalities.

The recent Joint Strategic Needs Assessment for the Over 50s recognised the importance of individuals being able to attend social events, clubs and activities, and in the 2018 Wellbeing Survey 11% of people over 50 reported that they were 'often' or 'always' lonely. Further,

35% of people reported that they had been prevented from getting where they needed to go within the previous year for one or more reason.

It is acknowledged that access to community facilities provides opportunity to maintain existing relationships, make new connections and promote a sense of purpose and meaning. The Partnership of Purpose specifically focuses on the role that community hubs can play in the future in improving direct access to co-ordinated services. The incorporation of such facilities within the Leale's Yard development provides opportunities to develop purpose built, multi-use sites which will be conveniently located for a significant proportion of islanders. I understand that officers from HSC have worked closely with the DPA in the preparation of the development framework and consider that the referenced

*“minimum of 500sqm of genuine community uses, available to all residents as a multi user hub should be provided within the main development site in a location overlooking the civic square”*

is appropriate and proportionate to the surrounding development. Work undertaken by HSC through its Community Transformation Programme demonstrates that internally two types of spaces are typically required; larger generic spaces for group sessions, events and training and smaller rooms for clinical purposes and 1:1s. At a very high level, a 500sqm space could accommodate:

- 2 x halls (or 1 x large & 2 x smaller – for exercise classes / recreational space for community & business use i.e. yoga, exercise classes, coffee mornings etc.)
- 6 x contact / clinic / meeting / hot desking spaces (recommend 1 x clinical standard and 5 x therapies, support meetings, counselling services)
- Conference / meeting room
- Facilities – incl. kitchen, toilets, reception space, library corner / hot desks, facility administration office, lift etc.

The Committee therefore welcomes, and supports the inclusion of community space within the Development Framework and considers the proposals appropriate to the community's needs.

### **Provision of housing and public open space with the Regeneration Area**

Housing can significantly impact on individual health. It is important that we take steps to ensure that Islanders have access to well designed, high quality homes which are appropriately sized and energy efficient and provide warm, dry, safe and safe accommodation and good access to high quality social infrastructure and green spaces. The Committee recognises however that there is a balance – and indeed inherent tension - between supporting amenity value and plot density (and consequently profitability for developers).

As you're aware, through the Partnership of Purpose, the States of Guernsey has committed, in all its policy decisions, to consider the impact on health and wellbeing and to make use of any opportunities to improve health or reduce health inequalities. The Committee acknowledges that this would have formed part of your deliberations in preparing the Development Framework and equally will your inform future considerations around the site.

Yours sincerely

*[sent electronically]*

**Deputy Rhian Tooley**

Vice-President

Committee *for* Health & Social Care

Deputy D Tindall  
President  
Development & Planning Authority  
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St Peter Port  
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6 April 2020

Dear Deputy Tindall

**Leale's Yard Regeneration - Draft Development Framework:  
The Land Planning and Development (Guernsey) Law, 2005  
The Land Planning and Development (Plans) Ordinance, 2007**

Thank you for your letter of 18 February on the draft Development Framework which has been prepared to provide planning guidance for the potential mixed use development of land at Leale's Yard Regeneration Area.

As you will have seen in the response dated 9 December 2019 to the Policy and Resources Committee which was forwarded to the Development & Planning Authority, the Committee has detailed what it considers the opportunities for the area and would like to see included in development of the site.

In this letter the Committee has limited its comments on the draft Development Framework to issues within its mandate as requested in your letter of consultation.

**Housing**

The Committee supports a mix of type, tenure, and size of dwelling being developed as it would enable a wider cross-section of the community's housing needs to be served by the site rather than focussing on one 'type' of housing alone. This will also ensure a good balance to the area.

The draft Development Framework highlights that the design of dwellings will have to take account of flood resilience and mitigation. In certain circumstances this could impact on accessibility; for example, if bedrooms were not designed at ground floor level. This has the potential to limit what types of dwelling are appropriate in different areas of the site. Some affordable housing units are likely to have specifications that will require careful

consideration by the developer(s) from the outset. The Committee considers that the draft Development Framework should give more emphasis to the need to design dwellings carefully to mitigate flooding from the outset whilst also designing for the specific needs of potential occupants.

It is understood that a wide range is proposed in the draft Development Framework for the numbers of dwellings that can be provided on the site to maintain maximum flexibility for the balance of uses on the site to ensure deliverability.

However, whatever the scale of housing provision, consideration must be given to the housing requirements set by the States Strategic Housing Indicator (SSHI), noting that this is under review as part of the 'States Strategic Housing Indicator Project' within the Housing Strategy Programme. This project seeks to develop a model to project the Island's housing requirements (broken down by tenure and size) and convert this into re-setting the SSHI. The results of this modelling should inform all developments, especially one with the potential yield of the Leale's Yard Regeneration Area to make sure it is focused on meeting the housing requirements of Guernsey.

It is noted that the draft Development Framework requires affordable housing to be delivered in accordance with policy GP11 of the Island Development Plan. The Committee *for* Employment & Social Security is likely to have more specific and detailed comments on the delivery of affordable housing which falls within its mandate.

### **A wider Bridge Strategy**

It is pleasing to note that the draft Development Framework acknowledges the need to consider the impacts of developing the site on the wider Bridge area. In particular, the further opportunities brought for a co-ordinated approach to flood defence, as well as improving the public realm, parking, traffic, and connectivity enhancement which are all matters which fall within the Committee's mandate.

Whilst it is noted that the draft Development Framework makes some suggestions about approaches to enhancement outside of the Regeneration Area and along the Bridge Frontage, the Committee recognises that this will be a wider piece of work to identify a comprehensive and co-ordinated approach which may provide different options and opportunities. In this respect, it would be useful if the draft Development Framework were clearer that the options contained within it are indicative and do not represent firm proposals.

The Committee has agreed that it is important to progress a consolidated Bridge Strategy as a priority following approval of the Development Framework.

### **Open space & Public Realm**

The Committee welcomes the draft Development Framework clearly outlining the significant opportunities for developing the public realm in the Regeneration Area through

a landscaped, car free, multi-functional civic square and a public green open space as well as improvements along the Bridge frontage. It is an important objective of the Integrated Transport Strategy (ITS) 'to improve the public realm, particularly in the main centres.' These improvements could also integrate with future public realm improvements that could be developed as part of the Harbour Action Area or a consolidated strategy for the Bridge frontage as noted above.

The minimum requirements for the public open space in the draft Development Framework is useful but may benefit from further emphasis added to highlight that this is the minimum size required and that the expectation should be that larger public spaces will be provided in order to be meaningful and truly accessible to the community. In addition, the Committee would welcome more emphasis on the importance of designing open public spaces which include landscaping from the outset, including more biodiverse areas and street trees. This should be an intrinsic part of the infrastructure of the site and the 'infrastructure first' approach to development required by the draft Development Framework.

The use of flood attenuation measures as suggested in the draft Development Framework should be encouraged. This would include the provision of water rills designed into streets and flood attenuation in green spaces. Pluvial flooding and drainage must be considered from the outset as an important part of the infrastructure of the site. The right type of landscaping and planting will be fundamental to the enhancement of biodiversity which should also be considered in the design of buildings.

### **Travel and Transport**

The main objective of the Integrated Transport Strategy (ITS) is to offer people the freedom to choose how they move around the island and to promote modal shift away from motorised vehicles. The draft development framework includes an appropriate mix of services and facilities on site that should minimise the need for residents living in the immediate area to travel by car. Also, it may reduce the need for some residents in the wider vicinity to travel to Town, thus reducing traffic, particularly along the Inter-Harbour route which carries, in Guernsey terms, high volumes of traffic.

It is pleasing that walking and cycling have been prioritised in the design. It is noted this includes a dedicated east to west route for pedestrians and cyclists between the Bridge and Lowlands Road which will give good access to the main centre for an increased number of nearby residents and, in the longer term, also for residents of the Saltpans site. However, greater emphasis should be given in the Development Framework to the requirements of policy GP 9 of the Island Development Plan which says that, unless there are sound reasons for not doing so, development in the Main Centres will be expected to make provision for facilities that will assist in people being able to commute by bicycle, motorcycle or on foot which might include, for example, designing in staff showers and changing facilities within commercial developments.

If the Co-op Food Store along Nocq Road is retained, there will remain a draw for vulnerable road users to continue using a narrow road which is not safe, particularly for pedestrians. These issues are likely to be heightened by provision of the secondary vehicular access to the Leale's Yard Regeneration Area off Nocq Road. Any proposals to improve safety for pedestrians along this route would be welcomed. These should be measures that are most manageable and cost-effective in the long-term.

There are several other suggested link routes across the Leale's Yard Regeneration Area and access points onto the public highway for pedestrians and cyclists. It is also pleasing to note that it states that all pedestrian routes must be continuous and accessible to all, with appropriate lighting to ensure the safety of all users, and that bicycle parking facilities for residents, workers, and visitors must also be provided. Provision of an access onto Lowlands Industrial Estate, if achievable, would further provide permeable pedestrian/cycling connectivity. Officers at Traffic and Highway Services can offer guidance on the latest accessibility standards for highway infrastructure.

Travel by bus is increasing and is an important element of the ITS to achieve a modal shift away from car use. Whilst there is some mention of the need to improve access to bus stops in the draft Development Framework, it is considered that there is an opportunity to give greater emphasis to the importance of bus travel. It is requested that clear reference is made to the need to provide bus stops as close to key areas as possible, such as the Bridge frontage, along with the need for well-designed shelters with seating capacity to accommodate relatively high numbers of passengers. It is considered that the Bridge could be developed as a well-designed bus hub which would support the development of the Regeneration Area.

Another objective of the ITS is "To achieve a greater proportion of cleaner, low emissions motor vehicles". Therefore, the Committee is pleased to note that the draft Development Framework states that consideration should be given to supporting infrastructure for renewable energy such as electric vehicle charging points. The provision of public and private charging points will help to encourage a faster switch to electric vehicles.

The Committee supports the recommendation for signalling the junction where the Leale's Yard Regeneration Area access intersects with the Bridge (currently a roundabout) to manage the movement of road users. A Traffic Impact Assessment (TIA) for this site will be required which will need to consider issues of road safety and traffic management.

The draft Development Framework states that Leale's Yard Regeneration Area should be served by at least two vehicular access points. These are a primary access point off the north end of the Bridge under signalisation and a secondary access point off Nocq Road. Whilst it is accepted that there are some benefits to creating a secondary access, these need to be measured against road safety concerns. Visibility issues at the secondary access will need to be addressed as well as ensuring that road users do not come into

conflict. Provision of an access that caters for all road users onto Lowlands Industrial Estate, if achievable, would be welcomed.

More detailed feedback on road safety and traffic management matters would be given once a detailed TIA has been produced for a more detailed master plan or detailed plans.

Regarding vehicle parking provision for the main development site, it is noted that the draft Development Framework provides for varying parking options to come forward depending on the development scenario proposed. From a traffic management perspective, it is considered important to promote a strong ethos of the site being a limited car ownership development, otherwise parking may transfer to the surrounding public highways. This consideration should form part of a Travel Plan which should be provided alongside a TIA. It is considered that it is important to ensure the provision of an appropriate mix of services and facilities on the site and the provision of well-designed pedestrian/cycle and bus infrastructure which will minimise the need for residents living in the immediate area to travel by car and reduce demand for parking.

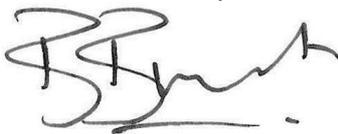
The provision of sheltered cycle parking, which is included in the draft Development Framework, is welcomed.

Vehicle parking along the Bridge frontage needs careful consideration to ensure it aligns with the aims of the ITS whilst providing some parking to meet the needs of the community. In part because of the proximity of parking, but also because of its level gradient making it more accessible, the Bridge is a key centre for elderly users. The Committee recognises that, a balance must be struck between providing adequate parking and the removal or relocation of spaces to make public realm improvements.

It is also recognised that the rearrangement of car parking also considers possible flood mitigation. A decreased level of parking on the Bridge frontage may also assist with traffic flow along the Inter Harbour Route so it can perform its functional emphasis of mobility and free flow.

Thank you once again for giving the Committee the opportunity to comment on the draft development framework. If any more detail is required on any of these matters, please do not hesitate for your officers to contact officers from the relevant service.

Yours sincerely



**Deputy B L Brehaut**  
President  
Committee *for the* Environment & Infrastructure



Committee for  
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18 March 2020

Dear Deputy Tindall

### **Leale's Yard Regeneration Area – Draft Development Framework**

Thank you for your letter dated 18 February 2020 requesting comments from the Committee for Employment & Social Security on the draft Development Framework for the Leale's Yard Regeneration Area. The Committee has limited its comments on the draft Development Framework to issues within its mandate only, most specifically in relation to the provision of affordable housing.

The Committee is pleased to note that the draft Development Framework emphasises the need for a range of type, tenure and size of housing units on the site. On a site of this scale, this is considered essential to ensure that the right 'community' balance is achieved, while also increasing the development viability of the site. The different components of 'affordable housing', as set out in the Committee's letter to the Policy & Resources Committee dated 27.11.19 (attached for reference as Appendix 1), each have distinct development requirements and the provision of a range of sizes and types of housing across the site will enable maximum flexibility to be achieved within this housing category.

The Committee is encouraged that the draft Development Framework specifically states to contact Housing at the earliest opportunity to discuss the housing requirements for the site. This is particularly key in relation to the provision of the affordable housing units that would be triggered by the implementation of Policy GP11 of the Island Development Plan. In order to meet the housing requirements set by the States Strategic Affordable Housing Indicator, and more specific data on property accessibility requirements, the affordable housing units are likely to have specifications that will require careful consideration by the

developer(s) from the outset and engagement early in the process is to be encouraged wherever possible.

In considering the application of Policy GP11, the Committee would like the Development Framework to more clearly emphasise that the site's requirements under Policy GP11 will be calculated based on the size of the development site as a whole, not on the size of separate phases or parcels. In particular, this needs to be included in reference to the Master Developer and phased development option that could be pursued. The Committee feels the Development Framework should be amended so that this point is listed in section 7.1 "The need for comprehensively planned development and EIA" as one of the minimum items to be set out for the main development site.

Finally, the Committee is encouraged to see the emphasis throughout the draft Development Framework on open space and improvements to the public realm quality in the surrounding area. This will not only improve the surrounding area but will also greatly enhance demand for housing in the area and should ensure more successful tenancies and partial ownership sales.

Yours sincerely

A handwritten signature in black ink, appearing to read 'M Le Clerc', with a stylized flourish at the end.

**Deputy M Le Clerc**  
President  
Committee *for* Employment & Social Security

## APPENDIX 1



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27 November 2019

Dear Deputy St Pier

### **Enabling the Progression of Development at the Leale's Yard Regeneration Area**

Thank you for your letter dated 09 October 2019 seeking the Committee for Employment & Social Security's views on the benefits the development of the Leale's Yard Regeneration Area (LYRA) could bring to helping meet the Committee's mandate and linked priority policy areas.

The development of LYRA has the potential to greatly assist a number of projects within the "Developing a Housing Strategy" priority policy area of the Policy & Resources Plan. The most notable and significant being the Affordable Housing Development Programme.

Under Planning Law, 'affordable housing', to which the Affordable Housing Development Programme refers, is defined as social housing and intermediate housing. 'Social housing' includes housing owned and controlled by the States or a registered Housing Association and is reserved for households on low incomes or with other needs identified by the Committee for Employment & Social Security; this includes specialised housing and key worker housing. 'Intermediate housing' includes housing owned or controlled by the States or a registered Housing Association that is offered on a part ownership basis to households that are ineligible for social housing but cannot meet the full cost of renting or buying appropriate housing on the private market without some form of subsidy.

The Island's projected housing requirements will be carefully modelled and projected as part of the "States Strategic Housing Indicator Project" within the "Developing a Housing Strategy" priority policy area. The ultimate objective of this project is to re-set the States Strategic Housing Indicator, of which the Affordable Housing Indicator is one component. Meeting the development requirements of the Affordable Housing Indicator should be planned for and worked towards through the Affordable Housing Development Programme.

The LYRA is an excellent location that, if developed for housing, could well serve residents due to its close proximity to a main service and retail area, strong transport links and relatively flat topography. For these reasons, the site/part of the site is attractive for the development of affordable housing and the Committee is confident the developed properties would be suitable, and in demand, for a range of tenures. The development of units for affordable housing on the LYRA, through the Affordable Housing Development Programme, would have a positive impact in meeting the Affordable Housing Indicator as set by the States.

There are two options for developing affordable housing that could derive from the development of LYRA.

The first option is for a parcel(s) of land within the LYRA to be purchased by a registered housing association solely for the development of affordable housing. As with all development sites, the cost of purchasing and developing the site, and any resulting capital grant requirements from the States of Guernsey, would need to be considered against recent developments and other comparable development site locations to ensure that it represented value for money.

Notwithstanding this, the Committee is clear that it would not seek to acquire the entirety of, or even majority of, the LYRA for affordable housing and hopes a mix of housing tenures would be encouraged. Although there are a number of different tenures within the affordable housing definition that could be pursued for this site as part of the Affordable Housing Development Programme, the scale of the site is such that the Committee considers a mix with private market housing essential.

The Committee is also currently considering the development potential of a number of housing sites within close proximity to the LYRA and so is hesitant to see a concentration of affordable housing units of the same tenure in one area of the Island. This would need careful management as part of the Affordable Housing Development Programme when the development potential and costs of all sites, including the LYRA, are better known.

The second option is land for the development of affordable housing to be acquired as a result of Policy GP11 of the Island Development Plan (IDP). The IDP states: "*The [Development & Planning] Authority will require proposals for development resulting in a net increase of 20 or more dwellings to provide a proportion of the developable area of the site for affordable housing*". The proportion of land area to be made available for the provision of affordable housing is dependent on the size of the overall development, as summarised in the table below:

Development Size	Proportion of the Site for Affordable Housing
20 or more dwellings but fewer than 25 dwellings	26% of the developable part of the site
25 or more dwellings but fewer than 30 dwellings	28% of the developable part of the site
30 or more dwellings	30% of the developable part of the site

Considering the size of the total LYRA site, it would fall into the “30 or more dwellings” category, so resulting in 30% of the developable housing area being required for affordable housing. This represents excellent value for money for the States of Guernsey as there are no land acquisition costs, only development costs to incur. On a site the size of LYRA, this would create a significant number of units for affordable housing and make a significant impact in meeting the Affordable Housing Indicator.

The Committee is keen to ensure that if the site is broken up and sold as separate land parcels, as suggested by The Channel Island’s Co-operative Society proposal, when implementing Policy GP11 the percentage requirement of affordable housing be calculated on the site as a whole rather than the development size of each individual development parcel. The Committee understands Policy GP11 of the Island Development Plan to be based on the housing developable area of the site as a whole rather than ‘broken up’ components but it wanted to reiterate that should the latter be pursued, the proportion of land area for affordable housing development would inevitably be less due to the reduced affordable housing land area percentage requirements on smaller sized sites. As a result, the affordable housing development programme would be adversely affected.

In addition to the benefits that could be made to the Affordable Housing Development Programme project, there are a number of other areas where the development of the LYRA could benefit. Within the “Developing a Housing Strategy” priority policy area, projects include the Key Worker Housing Strategy, Elderly Tenure Strategy, Review of Partial Ownership and Market Intervention. These projects are at the initiation stage so the outcomes are unknown, but should the projects result in recommendations for the development of additional key worker housing units, elderly tenure units, partial ownership units or other first time buyer scheme units, the development of the LYRA could play a key role in providing units to meet these requirements.

In response to your request for feedback on The Channel Island’s Co-operative Society development proposal for LYRA, the Committee was very mindful throughout their presentation that this was just one of the options that the Policy & Resources Committee would be considering in pursuance of the July 2019 Requête.

The presentation referenced additional schemes that it intended to pursue on the site with the Guernsey Housing Association (GHA), more specifically a Rent to Buy scheme. The Committee would caution that any additional first time buyer scheme operated by the GHA would need government approval and, at present, this has not been sought or indeed

any form of approach or consultation made. While a scheme of this nature may appear attractive, any scheme such as this should be considered as part of the “Market Intervention” project within the “Developing a Housing Strategy” programme. This project will consider and analyse intervention options that could be implemented in Guernsey’s housing market and the impact they might have on the Island’s housing market as a whole so that recommendations can be made on any scheme to be implemented. Referencing the intention to implement a scheme of this nature is inflammatory at this stage.

The Committee is keen to support the development of the LYRA and will consider the assistance it can provide in conjunction with the Policy & Resources Committee once the course of action is agreed by the States.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Me' followed by a stylized flourish.

**Deputy M Le Clerc**

President

Committee *for* Employment & Social Security

## Appendix D: Deputies feedback

A drop-in session for Deputies was held on 5th March between 2pm-6.30pm. Deputies Inder, Paint, Merrett and Brouard attended and spoke to officers of the project team. The purpose of the drop-in session was to set out the draft Development Framework and explain the process. Three Deputies followed up the meeting with their written thoughts and concerns for the site, as recorded in the table below.

Response number	Organisation	Name	Date of response	Comment	Tibbalds' proposed action
1	Member of the States of Deliberation	Deputy Jennifer Merrett	12/03/2020	Positive about inclusion of green space/civic space and community space	No actions to take
				Public/civic/community space needs protecting so can't be "absorbed" later	Inclusion of Key Delivery Requirements addresses this
				Flood defence and infrastructure changes need to be "determined in their entirety at the master plan stage", preference for infrastructure 'at least partially funded and future maintainence due to potential public ownership"	Review text regarding flood defence and infrastructure
				Reconfiguration of access points is key to accessibility for all	Review text and add reference where necessary
				Borders in close proximity to existing residential properties nees to be considered in more detail, including mitigation to lessen impact on members of the community	Review text and add reference where necessary
				Have trees been evaluated - do they needs TPOs?	Reference to potential requirement for arboricultural survey
				Concern about 6 storey heights, frontage of the Bridge should not be effected by buildings behind	Echoes public concerns, review and ensure cross reference between building heights and key views
				Variety in residential offer important to "ensure an inclusive and mixed community"	No actions to take
				Support vision statement, and broadly agree with proposed DDF and key principles	No actions to take
				Bridge options - "lean more towards option 3"	No actions to take
2	Member of the Policy & Resources Committee	Deputy Al Brouard	23/03/2020	Too focused with buildings in the space - "we are grasping a once in a hundred years opportunity... We can allow salt marsh, parks, ponds etc that work in and around the buildings"	Review and consider in combination with other delivery requirements and viability
				Need to focus more on attenuation the area could provide in mitigating "overtopping of the sea into this low lying area"	Review and consider; SuDS are recommended as a way to mitigate flood risk
				Need flexibility to be able to build above the water "or over the water on say stilts" - would be helpful is this was encouraged and permitted in the brief	Review and consider text on design innovation in combination with other delivery requirements and viability
3	Member of Development and Planning Authority	Barry Paint	23/03/2020	Concern - 'an assurance that a fool proof allowance has been made... for the sea overtopping the roads at the Bridge"	Review text on flood defence and confirm reference to additional technical studies required to develop a robust long-term strategy

## Appendix E: Co-op feedback summary

04 Notes and comments on the Draft Development Framework.pdf, received 13th March 2020			
Page #	Section # (if applicable)	Comment	Tibbalds' proposed action
ii		No other Development Framework notes the consulting team. We would suggest that in accordance with other DF published, the consulting team are not published	Agree to remove the specific reference to the consultant team in the DF
2	1.5 Consultant team	Not required as this document is a publication from the States of Guernsey	Agree to remove the specific reference to the consultant team in the DF
6	4. Site context and surroundings (generally)		No change - the text currently contains factual observations based on professional opinion.
6	4.3 Local character	Local character discusses the dominance of vehicles to the bridge and the loss of a 'high street' feel. The Bridge, however, remains an arterial and principal route both to The Bridge itself and to the north of the island and whether it is a feasible option to envisage The Bridge frontage ever providing an appropriate amenity space and sitting area does need to be considered, including the comments with regard to street furniture et cetera. Whilst not on the bridge itself, there are benches and seating areas to the south of the harbour where a more satisfactory outlook would be achieved on the seaside of the public highway.	No change.
7	4.4 Uses and facilities	It would be our opinion that a more brief and generic description could be provided which highlights the fact that the bridge provides for a broad range of secondary retail uses and services which do not compete with the main centre in St Peter Port.	Review and consider amending text regarding role of The Bridge as the second main centre, not to compete with St Peter Port.
8	4.5 Flood risk	Discusses the flood risk should identify the risks which do exist, but highlight that significant attenuation should be a States of Guernsey responsibility rather than one which is placed upon the developers of Leale's Yard. Leale's Yard will clearly deal with its own site specific issues, but whether there needs to be a reference to infiltration drainage is unclear as these are matters which any Master plan for the site would address; There is no mention of flooding from the West which would be inevitable if sea levels were to rise, due to the Bridge being one end of the historical channel dividing Guernsey	<b>Confirm flood risk from west with Expedition;</b> It has been agreed that a Key Delivery Requirement is "flood defence to be part of a comprehensive solution to flood defence of the wider Bridge area", however text to be reviewed and considered for amending regarding co-operation with the States in the delivery of a integrated flood defence strategy (with reference to 6.5 Delivery Strategy)
8	4.6 Air quality	Identifying this as a significant consideration for the developer of Leale's Yard appears to be inappropriate given that the bulk of air pollution in the area will come from traffic which already utilises the route and the majority of which bypasses the bridge. The power station, when in use, will also be a major contributor.	No change - the purpose of Section 4 is to describe existing conditions.

8	4.7 Local movement network	<p>Section 4.7 is clearly a principal concern and the opportunity with the redevelopment of Leale's Yard clearly exists to improve matters. However, the framework document does need to acknowledge a number of points, including the fact that the vast majority of people do still rely on private vehicular transport. The nature of the public transport system and typical day-to-day requirements with regard to shopping, the collection of children and other issues mean that in the short to medium term. There is unlikely to be a significant change and the infrastructure must be capable of accommodating this.</p> <p>The report comments on the frequency of bus connections to St Peter Port, and the north of the island, but these services are far from frequent, and not always reliable, and in particular, do not run into late evenings and the like. The potential reduction of The Bridge to one traffic lane in each direction may simply exacerbate the problem and the issue of the interface between the amenity and day-to-day requirements of the users of The Bridge and the broader issues of transport and traffic will need to be appropriately addressed, but the framework document must be realistic in what can be achieved.</p>	<p>No change - the purpose of Section 4 is to describe existing conditions.</p> <p>Text to be reviewed and considered for amending (i.e. within section 7.3 Access and movement ) to acknowledge that many people rely on private vehicular transport, as well as that current bus services could be improved to enhance their convenience.</p>
9	4.8 The Bridge Main Centre public realm	<p>The Bridge Main Centre Public Realm is noted. The draft document is aspirational in terms of what may be desirable from some perspectives, but the response which has been aired by the retailers on The Bridge itself clearly illustrates their concern. Providing far more restricted traffic to the front of The Bridge and attempting to provide a minimum of 20 parking spaces to the rear will not be an acceptable solution in our opinion for the majority of the retailers. Many of them have visitors who simply pop in for a brief short-term purpose and generally will not respond to what would be perceived as increased levels of inconvenience.</p> <p>The States of Guernsey may wish to consider making improvements to the north and south of The Bridge to create these as areas to 'linger' whilst the development within the Leale's Yard site will also contribute towards this and it remains the view that The Bridge itself does need to remain entirely viable and attractive to the retailers in particular who operate from this frontage and this does include the Channel Island cooperative Society.</p>	<p>No change - the purpose of Section 4 is to describe existing conditions.</p> <p>Text and options to be reviewed to consider how concerns regarding parking along the Bridge and the potential impact on the viability of retailers can be addressed in the section regarding 'Opportunities to improve The Bridge Main Centre' (currently 6.3)</p>
10	General	<p>In respect of image 4.12 and image 4.13, is noted that what are shown as being trees on the site are far from what would be considered specimens of good quality, the number of the trees being Leylandi and other shrubs. Likewise, a Protected Monument shown on the Leale's Yard site does not exist and the plan requires amendment.</p>	<p>Remove Protected monument in middle of site from Image 4.13 Existing heritage and conservation diagram; Review and consider amending text in section 4.10 to note that other trees and vegetation within the Main Development Site (i.e. non-protected trees) are generally considered to be low quality.</p>
10	4.9 Open spaces and parks	<p>Open Spaces and Parks appears to attempt to provide the justification for the creation of significant amenity and civic space. The excessive creation of this within the Leale's Yard site does impact upon its potential viability as land given over to an excess of open space has an opportunity cost in terms of a return to the developer who is seeking to create a viable financial model. There do remain other areas which could be used for some of these purposes, it is noted that Vale Castle, for instance, is not readily accessible to the public as its access is blocked by a chain. The States of Guernsey own other land in the vicinity and it therefore is a matter that could be addressed in an alternative form.</p> <p>It is noted however that the development of the site will, as a natural by-product, create areas and spaces which will create a good quality public realm.</p>	<p>No change - the inclusion of public open spaces within the Key Delivery Requirements is a response to the lack of easily accessible open space within The Bridge Main Centre, including the absence of a sheltered open space where community events could be held. The need for these types of spaces was clearly communicated during both initial and formal consultation.</p>
11	4.10 Protected buildings, trees and monuments	<p>The States Archaeologist wishes to be given the opportunity to investigate the landing points at either side of the bridge crossing</p>	<p>The States archaeologist has confirmed the requirement for a watching brief; to be included within the DF</p>

11	4.11 Key views	Given that section 4 of the report is dealing with the site context, it appears inappropriate for images 4.14 and 4.15 to be provided as a 3D massing model as once again, this could be viewed as being prescriptive with regard to any proposals for the site. It is clearly understood that a key element of any proposal for the site will be its impact in terms of long views. Photographs from these locations would be more appropriate.	Tibbalds to review and consider changing these 3D model views to photographs, however the 3D views do not show any indicative or proposed new development within the main development site.
12	4.12 Adjoining land designations	In terms of the Adjoining Land Designations, much of this content will be subject to potential change in a relatively short period of time and it may be appropriate for more general references to be included.	Adjoining land use designations will not change as they are in the IDP and therefore will remain as long as the IDP is in place (and association this DF). Review and consider clarification of text to acknowledge that the site context is dynamic and may change over time.
13	Chapter 5. Site description and site analysis	Is the purpose of this section to describe the development site or the regeneration area as a whole as this appears unclear?  It is also noted that the purpose of the land ownership diagram appears to be irrelevant.	The regeneration area as a whole.  The land ownership diagram illustrates the large landholding of the Co-op demonstrating why the DF refers to the "main development site" primarily for redevelopment.
13	5.1 Site use and land ownership	It states that the site is characterized by 'an extensive amount of self-seeding planting, including invasive species such as Japanese knotweed and pampas grass as a result of being neglected over a number of years. This theme is returned to on many occasions within this section of the report. The pampas grass which is present almost certainly has been as a result of being dumped on the land rather than having been self-seeded and the issue of Japanese knotweed has been well identified for a number of years, it is the subject of an ongoing programme of management and eradication and is a very limited area. It is been appropriately managed by the CICS and there appears to be an unnecessary repeating with reference to these matters.	We have received feedback from the States service area regarding the wording around Japanese Knotweed management, and so will amend text to reflect this.  The pampas grass is a highly noticeable feature throughout the site in it's current condition and has been noted as such.
13	5.2 Potential contamination, invasive species and site condition and 5.3 Site features, terrain, landscape and biodiversity potential	The issue of contamination, invasive species and other issues have been well dealt with in terms of their identification to date and this information with regard to the Leale's Yard site would be readily available to the final developer. It is also noted that the abundance of pampas grass is 'likely due to damp and boggy ground conditions' but to the best of the knowledge of the development team, the site does not have day-to-day issues with regard to the site being boggy.  It is noted within the appendices to the report that some form of arboricultural report will be required. The vegetation in terms of trees across the site is of an exceedingly poor quality and any requirement to progress this matter more fully appears to be entirely inappropriate and unjustified. The nature of the site is such that as redevelopment does take place, there will be a wholesale and integral element of landscaping to be dealt with, which will make a significant contribution to the regeneration of the area.	Tibbalds to confirm ground conditions related to pampas grass, and amend if necessary.  Tibbalds to review and consider amending wording on arboricultural report to say something along the lines of: "An arboricultural survey and report may be required to confirm the quality and extent of existing features, however it is acknowledged that a majority of the existing vegetation within the main development site is a result of the land being undeveloped for some time."
14	5.4 Utilities, drainage and services within the site	With regard to the utilities which would serve the site, this element of the report could be more brief as any developer will clearly make the specific enquiries with the individual utility providers. This path has been taken by the development team to date and would primarily be an issue dealt with as part of the Masterplan.	No change - the purpose of Chapter 5 is to describe and analyse the site.
15	5.6 Boundaries and edges	It is noted that the only significant level change is in respect of the land adjacent to Scope Furnishings within the Lowlands industrial site. However, as highlighted, the residential development to the west of the site has been undertaken to a reasonable degree on land which was formerly owned by the Co-op with the areas adjoining the boundary primarily being for car parking rather than amenity use and therefore this does create a different criteria which may be acknowledged.	No change - the purpose of Chapter 5 is to describe and analyse the site.

16	Image 5.10 Existing site constraints diagram	This is considered to be particularly useful, but the indication of trees on the site itself is misleading given that these are predominantly shrubs and bushes, or particularly low quality vegetation and could beneficially be removed.	No change - the purpose of Chapter 5 is to describe and analyse the site.
17	Chapter 6. Development opportunities and vision for the Leale's Yard Regeneration Area	It is the opinion of the Leale's Yard development team that the vast majority of the content of Section 6 of the report should be relocated to the appendices. The inclusion of content with regard to the initial consultation feedback is not relevant to the development framework, there being no statutory requirement for this to have been undertaken prior to the preparation of the framework document and with the interpretation of the representations remaining a subjective matter.	As stated in the DPA letter of response to the Co-op (dated March 27th), we are happy to restructure this chapter so that the indicative layout plan (formerly labelled as the Vision concept plan) is located towards the end of the document to illustrate how the Development Guidelines and Key Delivery Requirements could come together.  The initial consultation feedback will be updated to include the consultation feedback gathered during the statutory 6-week period. The inclusion of the consultation feedback within the DF is important to demonstrate why some of the Key Delivery Requirements and Development Guidelines have been put in place.
18	6.2 The Vision for the Leale's Yard Regeneration Area	Refers to the vision for Leale's Yard regeneration area is not a statutory document, albeit that it has been highlighted as a document that should be considered. It once again eventually becomes prescriptive and contributes little to the purpose of the development framework itself.	The Vision outlined in 6.2 is separate from the 'Vision' document prepared by a consortium of community members in 2013. The purpose of including a Vision statement within the Development Framework, as in many other projects, is to help create a clear objective for the site's redevelopment which is in line with the role of Leale's Yard as a Regeneration Area. The vision statement is reinforced by the Vision Principles, Key Delivery Requirements and Development Guidelines.  Tibbalds to review and consider amending the section title to 'The Vision statement for the Leale's Yard Regeneration Area' to help make the separation from the Vision document clear.
19	Image 6.8 Vision concept plan	This is a preferred layout that should form part of the appendices	Refer above action in response to comments on Chapter 6. Development opportunities et al.
20	6.3 Opportunities to improve The Bridge Main Centre	Opportunities to improve the main bridge centre are noted but once again, The Bridge itself is outside of the designated regeneration area and the matter of flood control is an issue which is for the States of Guernsey to address and to undertake within an appropriate timescale to accommodate a potential redevelopment of Leale's Yard. Reference to 'Interim flood defence options' (pages 21 & 22) are again inappropriate in our opinion within the main document. This should form part of the appendices	The Bridge is closely linked to the Regeneration Area, and will be impacted on directly by proposals that come forward in the Regeneration Area and equally the development of the Regeneration Area will be impacted by any developments on The Bridge (e.g. by access arrangements, flood mitigation and changes to the frontage itself).  Tibbalds to review and consider amending text to acknowledge that any improvements to the Bridge, harbour frontage, and integrated flood defence solutions will also need to be considered and co-ordinated as part of other workstreams by the States, i.e. Harbour Action Area strategy. Tibbalds to also consider the location of the section within the overall document.

23	6.4 Longer term opportunities outside of the Regeneration Area	<p>Longer term opportunities is a matter which is aspirational, but is clearly not integral to the regeneration area itself and the Leale's Yard development site. The aspirations of this section of the report will not be met by individual developers or property owners. It is noted, however, that if appropriate conditions exist which facilitate the redevelopment of Leale's Yard, this will act as a significant catalyst for other regeneration around the area and this is an aspect that clearly the States should respond to. However, the island does remain small and the areas of land which are available for development are restricted and there will inevitably be interfaces between adjoining uses, which in an ideal world would not exist. The development framework must be careful not to create unachievable aspirations. However, it may also be appropriate for the Development framework to identify that the high-density redevelopment of brownfield sites on The Bridge will remove pressure for development on other parts of the island which many in the north of the island believe is becoming excessive.</p>	<p>It is important that the DF for the Leale's Yard Regeneration Area looks beyond its boundary to understand the potential impacts, including cumulative impacts, and opportunities within the wider context. By setting out these Longer-term opportunities within the DF, it helps to identify more formally what opportunities could also impact on and benefit the wider area in the longer term.</p> <p>While the DF does not state anywhere that the developer of the Leale's Yard main development site is expected to input or deliver these longer-term opportunities, Tibbalds to review how this can be further clarified. Tibbalds also to consider the location of the section within the overall document</p>
25	6.5 Delivery strategy	<p>Delivery strategy is a matter which by and large would be considered within a Masterplan rather than within the Development framework. The planning history of the site has been previously reviewed and the non-delivery of these approvals has been highlighted. If this element of the report is to be retained, it should highlight the fact that there will be a requirement for the Masterplan to address the 10 Key Delivery Requirements.</p> <p>It is also within this section of the report that it may be appropriate to highlight the fact that the delivery of the project will require significant elements of public and private co-operation and furthermore, to highlight that the States of Guernsey will be responsible for significant elements of infrastructure if not only the Leale's Yard site is to be redeveloped, but other opportunities that exist within the vicinity are to be fulfilled. Further development beyond the scope of Leale's Yard is a key ambition of the BRC.</p> <p>Once again there are images within section 6.5 which are intended to illustrate successful master developer delivery approach but these are on a scale which is inappropriate for Guernsey and potentially mislead the reader. Leale's Yard is clearly a significant size but once again, the purpose of the Development framework is to set out what the parameters for development are but for these to be addressed within the preparation of the Masterplan itself.</p>	<p>Tibbalds to review whether this is the appropriate location within the document to include the Key Delivery Requirements. The supporting text will also cite IDP policy to state that any future development applications must accord with the DF.</p> <p>Also to review and consider adding a note regarding the potential for public and private co-operation for key infrastructure (i.e. flood defence) which will provide direct benefit to the Main Centre as a whole, for example, the integrated flood defence strategy; wording to be agreed by client team</p> <p>Tibbalds to review and consider changing images to reflect a more appropriate scale of development for Guernsey.</p>
26	Chapter 7. Development Guidelines	<p>suggest simplify text so that it accords with The Development Frameworks Guidance set out in the planning advise note 9</p> <p>This section of the DF should outline the policies applicable to this area. Generally a single paragraph should be sufficient for each sub section</p>	<p>Tibbalds to review text and consider simplifying where possible, however we will likely retain the level of detail provided as this allows the DF to clearly explain the reasoning for the guidance provided throughout the document.</p>
26	7.1 The need for comprehensively planned development and EIA	<p>Suggest simplification of [text from paragraph 6 onwards]. This information is more aligned to the provision of a Masterplan rather than a DF</p>	<p>Tibbalds to review text and consider simplifying where possible</p>
	7.1 The need for comprehensively planned development and EIA	<p>Suggest remove [paragraphs 3-5] or place in appendices</p>	<p>Tibbalds to review text and consider simplifying where possible</p>

26	7.2 Sustainable development opportunities and requirements	Is [paragraphs 2-3] required under a Development framework?	Tibbalds to review text and consider simplifying where possible, however as one of the Key Delivery Requirements is to consider sustainable development and the ability for proposals to act as an exemplar project in this regard justifies inclusion.
26	7.2 Sustainable development opportunities and requirements	[The last paragraph] would be more appropriate for a development brief/design statement as part of a master plan	Tibbalds to review text.
27	7.3 Access and movement - all sub-headings	Suggest this could be reduced and simplified	Tibbalds to review text and simplify where possible, however we will likely retain the level of detail provided as this allows the DF to clearly explain the reasoning for the guidance provided throughout the document. Access and movement is a key concern for the site and therefore the guidance must address the issues.
28	Image 7.4 Access and movement framework plan	Change Lowlands connection to Vehicular access point	Tibbalds to update diagram.
29	7.4 Public realm - open space and streets	Suggest this be put in the appendices as a suggested option	<p>The indicative plans and sections shown help to illustrate what is described in the text. As Key Delivery Requirements, it is important to illustrate what the open spaces could be like, however we will review the text to ensure that it clearly describes them as an indication of what spaces might be like.</p> <p>In response to feedback provided in the letter to Simone Whyte (dated 3 April), Tibbalds will consider the communication of the street sections, i.e. removing the specific dimensions given, and ensure that it is clear that they are indicative only.</p>
30	Images 7.9 and 7.10 (site sections)	Suggest this be put in as a suggestion in the appendices together with suggested layout options	Tibbalds to review and consider moving the overall site sections to sit with the Vision concept plan after the Development Guidelines as an indicative illustration of what the scheme could look like.
31	7.4 Public realm - open space and streets	Suggest ['All street proposals must demonstrate...' and street type descriptions and sections] be simplified or placed into one of the appendices	<p>No change - the bulletpoints/descriptions suggest reasonable good practice for general street and public realm design in any high quality place or location.</p> <p>Tibbalds to review text to ensure that the reasons for creating a clear street hierarchy are included, i.e. to assist orientation and wayfinding, being suitable for proposed uses, etc.</p>
32	Image 7.19 Public open space and street types framework plan	Could this be simplified. Could be presented a schematic format	Tibbalds to review and consider simplifying framework plan.

33	7.5 Landscape and biodiversity		<p>Conversations with Guernsey Water over the concern of flooding and the need for water management have suggested that Sustainable Urban Drainage Systems (SuDS) could be suitable for the Leale's Yard main development site, e.g. attenuations basins or ponds, which would hold back water to help alleviate pressure on drainage systems.</p> <p>It is acknowledged that locating these images next to Landscape and Biodiversity may be misleading, so suggest that we review the location of these images so it makes sense to the adjacent text.</p> <p><b>Tibbalds to also confirm with landscape consultant the suggested tree and and plant species.</b></p>
34	7.6 Site levels, flood risk, services and utilities	<p>Simplify to note that any proposals coming forward for the site should address the need identified for the wider area and provide a collaborative approach to dealing with flood risk.</p> <p>Elevated levels for buildings are not compatible with accessibility and lifetime homes requirements, nor are no bedrooms at ground floor levels.</p> <p>SuDS should not be a stipulation given the concerns on water table sea level, flooding, infiltration etc. A simple statement regarding suitable investigations into surface water drainage need to be carefully considered.</p>	<p><b>Tibbalds to review text with input from engineering consultant,</b> however the inclusion of SuDS has been recommended by conversations and formal response with Guernsey Water, and is generally considered as a positive way to approach flood risk mitigation measures. If designed well, they can become a positive and attractive feature within the masterplan.</p> <p>To review wording regarding the compatibility of Lifetime Homes on the site.</p>
35	7.7 Land uses and other activities appropriate for the site	<p>Can this be simplified to state that land uses proposed will be measurable in terms of market research, demand for the area and supportive of local industries already established in the area.</p>	<p>Tibbalds to review the land use framework diagram and its usefulness in regards to supporting the Development Guidelines. The key message that the framework plan aims to communicate is that any new development proposals will need to consider sensitive adjacent relationships with neighbouring properties, particularly residential. Review whether there is an alternative diagram to show this clearly.</p>
36	Image 7.26 Land uses and activities framework plan	<p>This diagram is too prescriptive for a Development Framework, is it relevant?</p> <p>Light pink area = this is the proposed commercial/business/ technology area which provides expansion to lowlands</p>	<p>Refer above action.</p>
38	7.9 Density, scale and building types	<p>[Under appropriate building types - for employment / retail / commercial / community]</p> <p>The site is capable of accommodating a variety of use classless we therefore suggest that this be acknowledge and noted for the following classes</p> <p>1,2,3,4,5,9,10,11,12, 15,16,17 18,18,20,21,24</p>	<p>The comment on use classes is more appropriate to Section 7.7 (above) however the flexible approach taken by the DF on allowing a broad range of uses across the site makes the need of specifying use classes unnecessary.</p>
40	7.10 Key views and relationship with the Bridge frontage	<p>This could possibly be shown in Plan form</p>	<p>Tibbalds to review and consider use of a diagram to illustrated key views, or potential to reference other diagrams which demonstrate the location of key views.</p>
41	7.11 Urban design approach to design, layout and character	<p>simplify are images [7.38-7.40] relevant?</p>	<p>Tibbalds to review and consider how these images can be more appropriately located with Section 7.10 Key views.</p>

44	7.12 Car parking requirements and approaches	Simplify to note the policy which applies to provision of parking	Tibbalds to review text and simplify where possible, however we will likely retain the level of detail provided as the text provides useful guidance for how to minimise the visual impact of car parking, which can often undermine other good qualities of a large-scale development. Ensuring there is an integrated parking strategy will be part of delivering a "comprehensive approach to development" and "sustainable development" as part of the Key Delivery Requirements
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General feedback

**Letter addressed to Jim Rowles, dated 3rd April 2020, from Mark Cox (Acting Chief Executive, CI Co-op Society)**

	Key issue 1.	The original Notes of the Meeting recorded that an agreement was reached to place all the design options in the DDF into the Appendix and to label them as non-prescriptive and examples only of what could be achieved. The proposed D&PA amendments refer to "concept plans" and making it "clearer in the main body of the DDF" that these would be "considered" for placing into the Appendix.	Our afternoon meeting with the Co-op did not conclude with the agreement to move all illustrative design options into the Appendix. It was agreed that the labelling and text supporting the illustrative material needed to be more clear in describing them as indicative only, as we completely understand and agree that this may not have been communicated strongly enough. We are more than happy to make this more clear in the revision to the DF and feel that restructuring the document would help to do so, for example, moving the indicative concept masterplan to the end of document, after the Development Guidelines as a demonstration of the guidelines, rather than with the introduction of the Development Framework Vision and Key Principles.
	Key issue 3. (also responds to Key issue 1. in DRP letter)	We note the D&PA Officers' concerns that quoting a figure of 35,000m2 of built space and a high density mix and balance of uses in the DDF "would have a negative impact on the flexibility of the DDF and have serious implications on the viability of the schemes coming forward in the future". We are concerned if this "Concept Plan" is retained within the main body of the DDF as the DDF's "preferred option" (which we appraised as 22,000m2 of built space) that it might become a benchmark of the built area to be allowed. We would take comfort from a simple statement being inserted in to the main body of the DDF to the effect that a density of mixed balances of use could be acceptable at 35,000m2 (but not necessarily limited to that area) so that there can be no confusion on this matter later on when we submit a future Planning Application.	I suggest inserting a statement in an appropriate section of the DF, along the lines of: "To enable flexibility for any future Planning Application, this Development Framework does not set a minimum or maximum volume of floorspace, as long as any future planning applications adhere to the Key Delivery Requirements and generally to the Development Guidelines (unless departure from the Development Guidelines can demonstrate good quality design and careful consideration of amenity issues which does not negatively impact on the immediate context and existing properties)."
	Key issue 4.	The amended Notes of the Meeting contain a further deletion regarding an acceptance of including the extension of Lowlands Industrial Estate Road and an associated 8,000m2 of commercial buildings. We did discuss this being important to our viability calculations in the meeting on 28th February and, as such, are confused by this deletion. Our concerns are further heightened when in the Notes of the Meeting the D&PA have sought to delete the following, "the acceptance that a mixed balance of uses as proposed in the BRC presentation with a less residential led mix would (subject to design) be able to obtain a planning approval." Again, we are unable to agree with these proposed deletions, as having checked with my colleagues, these matters were discussed, and this assurance was given.	The Development Guidelines indicate the recommended locations for particular uses, as informed by the site and context analysis. As these are guidelines (i.e. not included as part of the Key Delivery Requirements), any Planning Application would need to explain and justify a departure from these recommendations. For example, any Planning Application would need to demonstrate how existing buildings/properties are not negatively impacted in respect to privacy, overlooking, overshadowing, noise and other disturbance etc. We understand the viability of the BRP proposal includes a specific quantum (8000m2) of commercial buildings, and the DF does not preclude this figure coming forward or prescribe its location, however it does recommend that commercial uses are more appropriately located away from the back gardens of existing residential properties, and are closer to the mixed-uses near the Bridge.

Letter addressed to Simone Whyte, dated 3rd April 2020, from A J Dunnell (DRP)			
	Key issue 1.	Accommodation of a scheme which is of a mixed development use type and which extends to approximately 35,000 m <sup>2</sup> of built development.	(see above, response to Key issue 3. in letter addressed to Jim Rowles)
	Key issue 3.	That the Development Framework will facilitate development in a form which will enable the land to be subdivided to provide for development opportunities on a more limited scale for multiple developers/landowners. Imperative to this option, however, is the introduction of an infrastructure to the site to enable individual site development to progress in tandem with an adjoining site.	The DF requires a comprehensive approach to the design and delivery of the site which I believe is in accordance with BRC's approach to the site. Tibbalds to consider the benefit of providing an additional diagram setting out illustratively that the indicative proposals are capable of being delivered as a series of smaller plots within an overall coordinating masterplan.
	Text within Page 3	It is reiterated that the draft Development Framework bears little resemblance to all of the other Development Frameworks which have been prepared to date. It is been highlighted that this is the first Development Framework for a Regeneration Area and that factor is acknowledged. .... More specifically, all of the Development Frameworks to date have a section on Development Guidelines which usually begin with the following: <i>'The following guidelines must be read in association with the preceding analysis and context, and development proposals should respond appropriately to the constraints identified.'</i> These are usually 4-6 pages and followed by a single development guideline diagram identifying site access, sensitive boundaries, views in and out of the site, potential area suitable for development etc. This Development Framework does not have that. Instead it has 19 pages and very prescriptive diagrams including footpath and highway widths, specific requirements for public open space and so on. None of these are noted to be indicative or options and nothing resembling this has been presented in any other Development Framework document that we are aware of.	The reference to footpath/highway widths is acknowledged and Tibbalds will review potentially removing more specific dimensions to the indicative street sections. Requirements for open space however are included as Key Delivery Requirements to ensure the redevelopment of Leale's Yard delivers wider community benefits, particularly as public open space was a recurring theme to much of the feedback received by the public.  Contrary to the letter, all sections and public open space plans are clearly labelled "indicative" however we will review how we can make this more clear.

Letter addressed to Simone Whyte, dated 3rd April 2020, from A J Dunnell (DRP)			
	Key issue 1.	Reiteration "that as part of the consultation process we have requested that all the design concept plans are to be placed in the appendices and that these be clearly labelled as non-prescriptive and non-indicative."	Refer previous actions regarding clarification of the indicative layout plan as one option, and suggested changes to restructure the DF to make this clearer.
	Key issue 2.	Reiteration that the Co-op "would have liked the viability testing that the D&PA has carried out to have been shared with the Society prior to publication of the Supplementary Planning Advice" and that "the Society, as landowner, has taken a responsible commercial view on behalf of its Members not to commit further investment to this project, unless and until it can see a clear way to achieving a surplus in the long term"	It is the decision of the States that the information provided within the AspinalVerdi viability report is commercially sensitive and will therefore not be made available in it's detailed form.
	Key point 2.	The use of the indicative layout plan (previously described within the Development Framework as the Vision Concept Plan) on the front cover, and reference to a 'preferred scenario' within the Appendices had led media to depict these plans as "...what will be built". Additional reiteration regarding items being too prescriptive within the DF refer to: "prescribing precise designs and locations for widths to roads and pavements, designs and location of a green space and other fine details such as semi-mature tree planting." Furthermore, the Co-op state: "Given the recurring confusion on the preferred weight to be applied to the concept plans, as part of the Society's consultation response, we have asked that all references to preferred (or any) development scenarios or concept plans be removed and placed into the appendices."	Refer previous actions regarding clarification of indicative illustrative material and considering the removal of specific widths on indicative street sections.

	Key point 3.	"Thank you for confirming that the principle of commercial buildings adjoining Lowlands Industrial Estate Road could be considered under the terms of the DDF. It would be helpful if this mixed-use principle in this specific location could be referred to in the DDF as a possible outcome."	The Development Guidelines will continue to make recommendations based on site context and analysis, and the consultant team's expertise on urban design and how new development can best be integrated. The Uses Framework Plan will be reviewed.
	Key point 4.	The Co-op have stated that they are of the view that the correspondence shared between themselves and the Leale's Yard project team are within the public consultation record, despite differences in opinion on particular issues.	The Consultation Summary Report aims to respectfully represent the correspondence shared between the project team and the CI Co-op Society to reflect key issues and concerns, and the proposed responses to them (which will be integrated within the final Development Framework for the Leale's Yard Regeneration Area).
	Text within Page 3	The Co-op continue to believe that the draft DF presents "an unfortunate and unquantified benchmark of a much reduced 22,000m2 of built area, whereas the previous grant of planning permission had some 33,000m2 of built area", and wish to see that the DF includes a statement to clarify that the States will consider a proposal of this quantum.	Tibbalds to review and confirm that text ensures that there is no fixed minimum or maximum quantum of development that is expected on this site, permitted that proposed development meets the Key Delivery Requirements and accords with the DF, in line with IDP policy.