

Approach to Housing Site Allocations in the Draft Island Development Plan

December 2014

1 Introduction

- 1.1 This paper sets out how the draft Island Development Plan (draft Plan) meets the 5 year housing land supply requirement set out in the Strategic Land Use Plan 2011 (SLUP). It also sets out the approach taken to identifying the housing site allocations contained in Annex II 'Sites Allocated as Housing Sites' of the draft Plan. The housing site allocations were identified as part of the process of preparing the draft Plan alongside, in particular, the process of preparing the policies and provisions that are expressed spatially, such as settlement boundaries, areas of Important Open Land, and Regeneration Areas.

2 Background: Strategic Land Use Plan requirements

- 2.1 The Environment Department must respond to the requirements of the SLUP when preparing the draft Plan. The SLUP provides a high level spatial planning framework approved by the States to guide and direct the Environment Department in the preparation of the more detailed Island Development Plan policies. The SLUP was approved by the States on 30th November 2011 (Billet D'État XIX 2011). It provides general guidance and more specific directions to the Environment Department in preparing the policies and proposals of the draft Plan and exercising its other planning functions in order to achieve the States' agreed economic, social and environmental objectives set out within the States Strategic Plan.
- 2.2 With regard to housing land supply, Policy SLP13 of the SLUP requires the Island Development Plan to make provision for a 5-year supply of housing land in accordance with the housing target set by the States through a number of mechanisms that the Environment Department considers appropriate (such as allocated sites, enabling policies, etc.) and that '...before the end of the first 5-year period of validity of the Development Plans, the Environment Department will review the delivery of housing units over that period and assess the appropriate scale of housing provision for the remaining 5 year period of the Development Plans.'
- 2.3 The SLUP also directs the Environment Department to review the existing Housing Target Areas (Policy SLP14) to determine how they can contribute to meeting the five

year housing supply target while meeting the requirements of the Spatial Strategy. SLUP p.52 paragraph 2 states that 'There are a number of options for dealing with the existing Housing Target Areas and how to make adequate provision for housing beyond the first 5-year period of the Environment Department's Development Plan. Environment could assess which of the Housing Target Areas could be kept as strategic reserves for use some time in the future, as and when needed. Alternatively, they could be assessed in terms of which of them might form part of the first 5-year supply by, for example, identifying them as allocated sites that would not require an additional planning inquiry to be released for development.'

2.4 The SLUP also requires that:

- The Development Plans will make provision for the majority of new housing development within and around the Main Centres of St Peter Port and St Sampson/Vale.
- The Development Plans will make provision for Local Centres to provide more limited opportunities for housing development to enable community growth and to reinforce them as sustainable centres.
- The Development Plans will make provision for a range of social and specialised housing as part of the annual requirement for new homes as set out within the five year supply. Appropriate levels of provision of social and/or specialised housing on larger general market sites may be required through the use of planning conditions or planning covenants and established through a specified mechanism.
- In addressing housing need, the Development Plan should seek to make the most efficient and effective use of land and buildings by encouraging the re-use of previously developed land, promoting increased housing densities where appropriate and encouraging the inclusion of housing within mixed use schemes.

3 Approach to demonstrating appropriate housing supply in the draft Plan

- 3.1 This section sets out the approach taken to demonstrating a 5 year housing land supply in the draft Plan, and how the sites allocated for housing in the draft Plan were identified.
- 3.2 The State's Housing Target is currently 300 units per year (Billet D'État XXV 2007). This annual target has been projected forward to give a requirement for **1,500 dwellings over the first 5 years of the Island Development Plan**, or 3,000 dwellings over the full 10 year period of the Island Development Plan. As per SLUP Policy SLP13, the draft Plan provides for a 5-year supply of housing which will be reviewed before the end of the first 5-year period of the Island Development Plan to assess the appropriate scale of housing provision for the remainder of the Plan period.
- 3.3 Through the Key Issues and Options public consultation the Environment Department consulted on the approach to demonstrating an appropriate housing supply in accordance with the requirements of the SLUP. Taking into account the response received, the 5 year housing supply under the draft Plan will comprise **existing planning permissions**; an allowance for **windfall development**¹; and the **allocation of specific sites for housing**. The level of contribution towards land supply from each is set out below.

Housing land supply in the draft Island Development Plan

- 3.4 The Strategic Housing Land Availability Assessment (SHLAA) sets out a summary of the effective supply of land for housing (as of June 2014). This supply is comprised of:
- **the number of dwellings with planning permission and under construction:** The Environment Department records that the number of dwellings with planning permission and under construction as of June 2014 was **713 dwellings**.
 - an allowance for '**windfall**' dwellings: Under the current Urban Area Plan (UAP) and Rural Areas Plan (RAP), the Environment Department is reliant on windfall sites to meet 100% of the Island's housing need. Whilst the majority of the five year supply will be met by allocations, the draft Plan will still allow for windfall provision to come forward and contribute to housing supply through enabling policies. This will come forward in the form of conversions, subdivisions, extensions and infill development similar to that permissible under the current Urban and Rural Area Plan policies. Providing a windfall allowance ensures that the contribution these types of development make to overall housing supply are accounted for, and ensures that there is not an oversupply of housing land. Under the draft Plan up to 20% of the 5 year housing requirement would be met via windfall sites; the remainder (80%) would be met by sites identified for housing development in the draft Plan and those with planning consents. The

¹ Windfall sites are sites that have not been identified specifically for housing in a development plan, but that come forward for development and receive planning permission for housing by being otherwise consistent with planning policy and other material considerations identified in Planning Law. This is done by putting in place 'enabling' policies which promote or restrict development in different areas but which overall allow for the right amount of housing to come through.

figure of up to 20% windfall provision is based on trends in planning permissions over recent years which indicate that at least one-fifth of the Island's total housing need (up to c.60 dwellings annually, that is, up to 20% of the total 300 required) could be consistently met by windfall schemes of five dwellings or under during the Island Development Plan period. This windfall allowance of **150 to 300 dwellings** represents a conservation position on windfall development that could come forward over the first 5 years of the Island Development Plan. Further details on the calculation of this windfall allowance are in Section 5 of the SHLAA.

- **sites allocated for housing** in the draft Island Development Plan: Taking into account the supply of dwellings with planning permissions and the windfall allowance above, the draft Plan would be required to allocate sites to provide for at least **637 dwellings** to demonstrate the 5 year supply as required by the SLUP.

3.5 In light of the above, the draft Plan proposes to allocated **15 sites** for housing; these sites could provide at least **718** dwellings. The details of the approach taken to identifying these housing site allocations in the draft Plan is explained below.

4 Approach to Allocations

4.1 This section sets out the approach taken to identifying the 15 sites allocated for housing. These sites were identified primarily having regard to:

- the requirements and provisions of the SLUP
- the other policies and provisions of the draft Island Development Plan, in particular those that are expressed spatially
- the findings of the SHLAA

Account was also taken of the findings of the Environmental Impact Assessment and the Employment Land Study.

Spatial Strategy

4.2 The SLUP Spatial Strategy seeks to concentrate development within and around Main Centres with more limited development in Local Centres to provide development to enable community growth and the reinforcement of sustainable centres. The initial iterations of the SHLAA indicated that there would be sufficient capacity by allocating sites within and around the Main Centres to meet the housing target which is in accordance with the spatial strategy of the SLUP, and that there would be no need to allocate sites for housing development within Local Centres to provide the 5 year housing land supply. These factors, coupled with the absence of robust information on the level and type of housing provision that would be appropriate to each Local Centre to enable community growth and the reinforcement of sustainable centres, led the Environment Department to not include detailed assessments of individual Local Centre sites within the SHLAA. As such, **sites within and around Local Centres are not considered for allocation for housing in this report.** Housing development within

Local Centres may, however, be permissible as windfall development where proposals accord with the policies of the Island Development Plan.

SHLAA

- 4.3 A total of 576 sites were assessed through the SHLAA. Of these, a total of 285 sites were assessed in detail; these were the sites considered to be within or around the Main Centres of St Peter Port and St Sampson / Vale. **63** of these sites were considered to be potentially appropriate for allocation in the draft Plan as both deliverable and developable in the first 5 years of the Island Development Plan, and represent the pool of sites from which the 15 housing site allocations contained in the draft Plan are drawn. The SHLAA found that this pool of 63 sites could provide between c.310 and 1,350 more dwellings (depending on the density of development) than the minimum required (637) for the first half of the Island Development Plan period. As such, these 63 sites were taken forward for final evaluation, as set out in this report, to assist in prioritising the sites and to enable the Environment Department to move towards a shortlist of preferred sites for allocation.

Other considerations emerging from the draft Island Development Plan.

- 4.4 The 63 sites were first evaluated alongside the other draft spatial elements of the draft Plan. Particular regard was had to:
- the findings of the 'Identifying Main Centre Boundaries' report, 2014 which informs the identification of the Main Centre and Main Centre Outer Areas boundaries in the draft Plan.
 - the findings of the 'Important Open Land in proposed Main Centres and Local Centres' report, 2014, which informs the identification of the areas of Important Open Land in the draft Plan.
 - the findings of the 'Main Centres: Core Retail Areas and Regeneration Areas' report, 2014 which informs the identification of the Regeneration Areas in St Peter Port and St Sampson / Vale Main Centres which would allow for the principle of housing development as part of mixed use development.
 - The findings of the Employment Land Study 2014, which informs the identification of Office Expansion Areas, Key Industrial Areas, and Key Industrial Expansion Areas in the draft Plan.
 - The findings of the Appraisal of Sites of Special Significance 2014 which informs the identification of the Sites of Special Significance in the draft Plan.
- 4.5 The findings of this exercise were that:
- 6 of the sites would fall within locations identified as being of value with regard to their openness ('important open land'). These sites were SPP021, SPP029, SPP030, SPP036, SPP043, and SPP057.
 - 2 sites would fall within locations identified as being potential Regeneration Areas in the draft Plan. These sites were SPP097 and SPP111.
 - 1 site would fall within locations identified as being potential Key Industrial or Key Industrial Expansion Areas in the draft Plan. This site was SPP025.

Additional details of these sites can be found in the SHLAA.

Final evaluation of sites

- 4.6 The Environment Department’s preferred approach to housing site allocations involved carrying forward sites that are identified as suitable for housing in existing policy and that are as yet undeveloped. This includes the 5 Housing Target Areas (HTAs); these are referenced in the SHLAA as SPP096 La Vrangue, SSV120a-c Belgrave Vinery, SSV121 Franc Fief, SSV122 Saltpans, and SSV123 Pointes Rocques. It also includes the remaining undeveloped Development Brief sites; these are referenced in the SHLAA as SPP103 Maurepas Road, SPP104 Petites Fontaine, SPP109 Former Priaux Garage and SSV129 Les Bas Courtils.²

Housing Target Areas

- 4.7 The SLUP requires specifically that the existing Housing Target Areas are reviewed to determine how they can contribute to meeting housing supply (Policy SLP14). The 5 HTAs are long-standing strategic reserves of housing land which, under the UAP, were intended to be released for housing development through a Local Planning Brief when monitoring indicated that the housing supply was insufficient to satisfy Policy HO1 of the UAP or when the Environment Department was so directed by the States. There has been no requirement in terms of housing targets to release these sites and in any case the mechanism for their release has proven to be ineffective and as such they have remained undeveloped.
- 4.8 There are no other sites that offer the potential scale of development and strategic location within and around the Main Centres and which are suitable, available and achievable. The sites largely continue to be appropriate for housing development and these strengths are the most significant that the HTA sites offer. Their development would make a significant contribution to the provision of housing, including affordable housing. The development of the HTA sites could increase the total stock of housing on the Island by between 3% and 6%.
- 4.9 The Environment Department, in accordance with the requirements of the SLUP, re-evaluated the HTA sites and found that the majority of the sites could still contribute significantly to housing supply in an appropriate way. Given the direction to re-evaluate these sites in the SLUP and their potential to deliver significant levels of housing, it was the Department’s position that these 5 sites should be carried forward for development provided that there were no significant negative impacts that could not be mitigated via the policies and provisions of the draft Plan or via project level Environmental Impact Assessment mitigation. A summary of the evaluation of the 5 former HTA sites is set out below:

Site ref. no.	Evaluation summary
SPP096 La	The SPP096 La Vrangue site did not conflict with other potential

² It should be noted that the extent of these sites (with the exception of SPP109 Former Priaux Garage and SSV129 Les Bas Courtils) as currently identified in the UAP and RAP differ in some minor respects to the sites assessed in the SHLAA and discussed below; differences between the site boundaries are indicated in the relevant sections below.

Vrangue	<p>provisions of the draft Plan.</p> <p>The SHLAA sets out details of the individual landholdings that make up this site. The area considered here for allocation is slightly larger than the HTA site as it includes a small area at the very north of the site (c.700 sqm). C. 90% of the HTA site was submitted through the Call for Sites or has planning consent for housing.</p> <p>With regard to availability, approximately 76% of the site is considered deliverable, that is, available for development in the first five years of the Island Development Plan:</p> <ul style="list-style-type: none"> • The main body of the site is comprised of ‘Balmoral Vinery; this makes up c.68% of the overall site and is considered to be deliverable. This area comprises a former vinery which is in the process of being cleared. • ‘La Vrangue Manor’ and ‘La Vrangue Lodge’ (which comprise c.8% of the overall site) have planning consent for housing development, (FULL/2011/1834 and FULL/2011/0799) and as such are also considered to be deliverable. <p>The remaining 19% of the site is considered to be developable, that is, available for development in the second 5 years of the Island Development Plan:</p> <ul style="list-style-type: none"> • The tenants of the Old Tobacco Factory (which comprises c.19% of the overall site) have in excess of 5 years left on the lease of that site, and as such it is considered to be developable. • The College of Further Education is within the States Asset Management Plan (SAMP) 5 to 10 year timeframe and as such is considered to be developable. <p>The dwelling ‘La Bordage’ (which comprises c.5% of the site) is not considered to be deliverable or developable as it was not submitted through the Call for Sites and has not otherwise been proposed for housing development.</p> <p>The EIA identified sensitivities to the development of the site in relation to heritage and landscape impacts.</p> <p>The Planning history of the site (e.g. FULL/2011/1834, FULL/2011/0800, FULL/2011/0799 and FULL/2009/3573) indicates that the sensitivity of the site with regard to heritage issues would not be a significant restriction on development, as the sensitivity in this regard relates mainly to La Vrangue Lodge and La Vrangue Manor which comprise a relatively small proportion of the site (c.8%). Policy GP5 ‘Protected Buildings’ of the draft Plan seeks to preserve the special interest of Protected Buildings. As such it is considered that the development of the larger La Vrangue site could be developed whilst protecting the special interest of La Vrangue Lodge and La Vrangue Manor. This has</p>
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	<p>been taken into account in estimating the potential dwelling yield of the overall site.</p> <p>With regard to landscape sensitivity, the main issue is a small area of land at the north of the site (c.700 sqm) which is identified as an Area of High Landscape quality in the Rural Area Plan. The site is not proposed to be designated as Important Open Land in the draft Plan, nor is this area essential to the development of the overall site. As such it is considered that the sensitivity of this area identified in the EIA is not sufficient to inhibit the identification of the site for housing development in the draft Plan, particularly having regard to the provisions and requirements of Policy GP1 'Landscape Character and Open Land' of the draft Plan.</p> <p>As set out above, this site has previously been identified as a strategic housing reserve over the long-term. The majority of the site is also a former vinery site, which is in the process of being cleared. It is acknowledged that just over one-fifth of the site is not considered to be deliverable over the first five years of the Island Development Plan, however it is expected to be available in the second half of the Island Development Plan period. In addition it was considered that the sensitivities identified in the EIA could be dealt with through careful design and mitigation measures required under the policies of the draft Plan, in particular through policies GP1 'Landscape Character and Open Land, and GP5 Protected Buildings.</p> <p>Taking these factors into account it was considered that the appropriateness of allocating the site for housing out-weighed the issues identified above, and as such it was considered appropriate to take the site forward to be considered for allocation in the draft Plan.</p>
SSV120a–c Belgrave Vinery	<p>The former Belgrave Vinery HTA site was assessed in three parts; the former Phase 1 as SSV120a (the area to the southwest), former Phase 2 as SSV120b (the area to the east) and former Phase 3 as SSV120c (the area to the northwest).</p> <p>Site SSV120a comprises c.61% of the existing HTA; site SSV120b comprises c.12%; and site SSV120c comprises c.27% of the existing HTA.</p> <p><u>SSV120a:</u> This site comprises primarily a large area of mainly Greenfield land and land associated with open air storage. The majority of this area (c.93%) was submitted through the Call for Sites. However the site was indicated in the Identifying Main Centre Boundaries 2014 as being outside of the preferred Main Centre Outer Areas boundary. As such, this site was not taken forward for further assessment or allocation in the draft Plan. It should be noted that the site was considered to be developable in the SHLAA however, and may be considered again at a future date if required but this would require amendment of the Main</p>

Centre Outer Area boundary.

SSV120b: This site comprises a large area of mainly Greenfield land and some areas associated with open air storage. All of this site was submitted through the Call for Sites (as sites SSV091, SSV092 and SSV093 (part)).

C.89% of the site is flood zone, which extends to adjacent land.

SSV120c: This site comprises a large waste storage & processing facility, a Greenfield area to the south, and a cleared vinery to the north. The majority of the site (c.75%) was submitted through the Call for Sites (site SSV046 and SSV090) however 3 no. areas (c.25% of the site) were not submitted (the access road to the waste storage & processing facility; a shed in the north-east of the site, and the large Greenfield area to the south).

C.45% of the site is flood zone (mainly in the southern parts of the site).

In the EIA, sites SSV120b and SSV120c were assessed as being of high sensitivity to change with regard to flood risk. The SHLAA identified that detailed investigation of the impact of flood risk on the development potential of the sites will be required. The SHLAA found that the likely high infrastructure costs associated with drainage and utilities will be a significant factor in the viability of the site. Policy LP3 'Climate Change Adaptation' of the SLUP states that the Development Plan should enable the risk of flooding to be assessed on a case by case basis, rather than adopting a general policy approach that discourages development within vulnerable areas. As such it was considered that flood risk issues could be dealt with through careful design and mitigation measures which could be required under the policies of the draft Plan, primarily in the form of Policy GP9 'Sustainable Development'.

The SHLAA also identified that detailed assessment in relation to contamination and remediation will be required. This mainly relates to site SSV120c and partly to site SSV120b. The SHLAA found that the likely costs associated with remediation will be a significant factor in the viability of the site. It was considered however that issues relating to potentially contaminated land and public safety could be dealt with through careful design and remediation measures which could be required under the policies of the draft Plan, primarily in the form of Policy GP17 'Public Safety and Hazardous Development'.

The SHLAA identified sites SSV120b and SSV120c as being developable. Whilst the majority of the sites were considered to be available, the identification of the site as developable (that is, likely to come forward in the second half of the Island Development Plan period) was on account of the likely significant costs associated with developing the

	<p>site in relation to contamination remediation and flood risk. However, it was considered that the significant benefits that the development of these sites would have on housing and affordable housing land supply out-weighed the issues identified through the SHLAA and EIA, particularly as the majority of these issues could be satisfactorily dealt with via mitigation arising from policies in the draft Plan and assessment through project level Environmental Impact Assessment if required. As such, and taking these factors into account it was considered appropriate to take sites SSV120b and SSV120c forward to be considered for allocation in the draft Plan.</p>
<p>SSV121 Saltpans</p>	<p>The SSV121 Saltpans site did not conflict with other potential provisions of the draft Plan. The site had a high sensitivity to change in respect of flood risk in the EIA.</p> <p>The entire area of the HTA was submitted through the Call for Sites as being available immediately. A relatively small area within the site is used for open air storage purposes, however this is not considered to inhibit the development of the overall site. Two small areas were submitted through the Call for Sites which extend beyond the original HTA boundaries. In short, all of the site is considered to be available and deliverable.</p> <p>With regard to constraints, the SHLAA notes that c.15% of site is under glass, however the additional contamination costs have been taken into account in the provisional assessment of achievability made as part of the SHLAA and are not considered to inhibit the development of the site. It is also noted that c.25% of the site comprises a large waterbody, however the impact of this has been taken into account in estimating the development potential of the site.</p> <p>c.70% of site (northern portion) is within a flood zone. In the EIA, as with sites SSV120b and SSV120c, site SSV121 was assessed as being of high sensitivity to change with regard to flood risk. Policy LP3 'Climate Change Adaptation' of the SLUP states that the Development Plan should enable the risk of flooding to be assessed on a case by case basis, rather than adopting a general policy approach that discourages development within vulnerable areas. It was considered that flood risk issues could be dealt with through careful design and mitigation measures which could be required under the policies of the draft Plan, primarily Policy GP9 'Sustainable Development'. However, it is acknowledged that detailed assessment of flood risk, including on the development potential and viability of the site, will be required.</p> <p>As set out above, this site has previously been identified as a strategic reserve for housing over the long-term. Significant areas of the site comprise a former vinery site. It is acknowledged that the clearing of glass, the impact of the existing waterbody, and the impact of flooding must be assessed in detail and have the potential to affect the viability</p>

	<p>of development and development potential of the site. It was considered that the sensitivities identified in the EIA could be dealt with through careful design and mitigation measures which could be required under the policies of the draft Plan, through Policy GP9 'Sustainable Development'.</p> <p>Taking these factors into account it was considered that the allocation the site for housing out-weighed the issues identified above, and as such it was considered appropriate to take the site forward to be considered for allocation in the draft Plan.</p>
<p>SSV122 Franc Fief</p>	<p>The SSV122 Franc Fief did not conflict with other potential provisions of the draft Plan. Within the EIA the site was assessed as not having a high sensitivity to change in any respect.</p> <p>The site comprises significant areas of redundant vinery and other Greenfield areas, as well as a number of dwellings.</p> <p>C.91% of the existing HTA was proposed through the Call for Sites as being available immediately (three areas, to the north-east, west and north-west were not proposed, however it is considered that the development of the remainder of the site would not be inhibited). Two small areas were proposed through the Call for Sites which extend beyond the existing HTA boundaries. One of these, an area to the north, relates to residential development that is under construction at this location, which in turn relates to the area of the original HTA at this location which was not put forward through the Call for Sites, mentioned above. This area is being developed primarily under planning applications FULL/2013/0882, FULL/2013/3626, FULL/2014/2248, and FULL/2014/3372; it should be noted however that these schemes have been designed to provide access to the overall Franc Fief site in the future.</p> <p>As set out above, this site has been previously identified as a strategic reserve for housing over the long-term. The majority of the site is also a former vinery site and is considered to be deliverable immediately. Taking these factors into account it was considered appropriate to take the site forward to be considered for allocation in the draft Plan.</p>
<p>SSV123 Pointes Rocques</p>	<p>SSV123 Pointes Rocques did not conflict with other potential provisions of the draft Plan. It also had low to medium sensitivity to change in all respects of the ES criteria.</p> <p>The site comprises mainly a large vinery, which is part disused and part working vinery.</p> <p>With regard to deliverability and availability, c.97% of the original HTA site was put forward through the Call for Sites, as three separate but coordinated submissions and landholdings. The remaining 3% of the</p>

	<p>site was not put forward, however this is not considered to inhibit the development of the overall site but has been taken into account in the estimated yield. It should be noted that an area to the north-west of the original HTA (a dwelling) was also proposed through the Call for Sites and is also assessed here for allocation, as set out in the SHLAA. The most recent planning application on the site was for a residential development on the southern part of the site in 2001 (PAPP/2001/0430). Within this context, it is considered that c.97% of the site is deliverable.</p> <p>With regard to constraints, the SHLAA notes that a large proportion of the site is under glass; the likely clearance costs have been taken into account in assessing the achievability of the site but are not considered to inhibit the development of the overall site. It is considered however that a detailed assessment of traffic and transportation matters will be required, specifically the quality and safety of the adjacent road network (i.e. Rue des Pointues Rocques). However traffic and transportation issues were not considered to be a significant restriction undermining the development potential of the site in the Traffic Study for Guernsey Housing Target Areas, 2010.</p> <p>As set out above, this site has been previously identified as a strategic reserve for housing over the long-term. The majority of the site is also a viney site and is considered to be deliverable immediately. There were no significant sensitivities identified in the EIA. Taking these factors into account it was considered appropriate to take the site forward to be considered for allocation in the draft Plan.</p>
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Development Brief sites

- 4.10 There are 4 no. sites which have Development Briefs but which remain undeveloped. Development Briefs are used in the UAP to provide a broad but comprehensive framework for larger scale or more complex development sites. It is considered that the provision of a Development Brief signals a certain commitment or intention to develop. These sites combined could provide between 42 and 66 dwellings. It is considered that as these sites are often more challenging sites to develop, and as they are currently identified for housing development under the UAP, they should be prioritised for allocation in the draft Plan if they are considered to remain appropriate for development. As with the HTA sites, it was the Environment Department’s position that these sites should be carried forward for allocation in the draft Plan if there were no significant negative impacts caused through their development that could not be mitigated via the policies and provisions of the draft Plan.
- 4.11 A summary of the evaluation of the 4 remaining undeveloped Development Brief sites is set out below:

Site ref. no.	Evaluation summary
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<p>SPP103 Maurepas Road (SPP038)</p>	<p>The subject site comprises an open field. It was proposed for housing by the current owners through the Call for Sites as site SPP038.</p> <p>Site SPP103 Maurepas Road did not conflict with other potential provisions of the draft Plan. It also had low to medium sensitivity to change in all respects of the EIA criteria.</p> <p>The site, as assessed in the SHLAA, forms part of a larger site (c.1,400 sqm of 6,180 sqm) which extended to the west. The remainder of the larger site was recently developed for housing (15 dwellings, PAPP/2006/2785 and PAPP/2006/2681) and the subject site was retained as Greenfield land. The Maurepas Road Development Brief was adopted in June 2005. In the Brief (which covers the larger 6,180 sqm site) and Planning Applications PAPP/2006/2785 and PAPP/2006/2681 the subject site was identified as ‘open space to be retained’; however the subject site is not identified or protected as such in the UAP. The site does not appear to be accessible or for use by the residents of the surrounding area and is not identified as Important Open Land in the draft Plan.</p> <p>Taking these factors into account it was considered appropriate to take the site forward to be considered for allocation in the draft Plan.</p>
<p>SPP104 Petites Fontaine</p>	<p>The subject site was previously a walled garden. The site as here assessed forms the western part of a larger site which comprises the extent of the Petites Fontaine Development Brief. The Development Brief was adopted in August 2006.</p> <p>The site did not conflict with other potential provisions of the draft Plan. It also had low to medium sensitivity to change in all respects of the EIA criteria.</p> <p>The eastern part of the larger site was recently developed for housing (FULL/2011/1156 and FULL/2010/3087). Planning permission for 10 dwellings was recently granted on the subject site (FULL/2013/1894) but has not been developed and therefore would be appropriate to include for consideration.</p> <p>Taking these factors into account it was considered appropriate to take the site forward to be considered for allocation in the draft Plan.</p>
<p>SPP109 Former Priaulx Garage</p>	<p>The site comprises 2 dwellings and sheds / warehouses associated with former garage on-site. The draft ‘Les Oberlands’ Development Brief for the site has not been completed, however the Environment Department issued development guidelines for the site in 2009.</p> <p>The site did not conflict with other potential provisions of the draft Plan. It also had low to medium sensitivity to change in all respects of the EIA criteria.</p>

	<p>The SHLAA considered the site to be developable on account of its availability which did not meet the criteria to be considered deliverable; approximately 75% of the site is owned by the Health & Social Services Department, with the remainder, the south-west portion, being privately owned; however no part of the site was proposed through the Call for Sites. The most recent planning application relating to the redevelopment of the site was granted in 1999 (PAPP/1999/2794), however this scheme was not constructed. It is noted that the Environment Department recorded a number of expressions of interest relating to the development of the site in 2010.</p> <p>Whilst the site is within the draft St Peter Port Main Centre Outer Area Boundary, and as such could in principle be developed as windfall development once the Island Development Plan is adopted, it is considered that in the absence of a finalised Development Brief, the allocation of the site for housing would increase surety and certainty as to the future of the site and assist in finalising its redevelopment. It is acknowledge however that the site does not meet the availability criteria to be considered deliverable. However it is the Environment Department's position that weight should be given to fact that a draft Development Brief is to be completed for the site and as such identify the site for allocation in the draft Plan.</p> <p>Taking these factors into account it was considered appropriate to take the site forward to be considered for allocation in the draft Plan.</p>
SSV129 Les Bas Courtils	<p>The Bas Courtils Development Brief pertains to the site and was adopted in May 2010. It highlights that the site comprises a former orchard and vinery. The key issues which the Brief seeks to manage are the highly sustainable location of the site and its potential for development, and the historic context, landscape character, prominence and views.</p> <p>Site SSV129 Les Bas Courtils did not conflict with other potential provisions of the draft Plan.</p> <p>The EIA found that the site had a high sensitivity to change with regard to heritage and landscape:</p> <p>With regard to landscape character, whilst the site was not identified as an Area of Landscape Value in the UAP, the site was considered sensitive due to its seafront location on the main coast road; that it adjoins an Area of Landscape Value to the north; and as there is a Tree Protection Order on the site. These issues are reflected in the pattern of development indicated in the Development Brief for the site.</p> <p>With regard to heritage issues, the existing dwelling on-site is a Protected Building. The building holds a prominent position on the site and sits within an extensive setting which addresses the road. As set out</p>

	<p>in the Development Brief for the site, this leaves the eastern portion of the site as the potential development area; this is reflected in the estimated yield for the site set out in the SHLAA.</p> <p>It is considered that the issues relating to heritage and landscape sensitivity in the EIA can be satisfactorily dealt with via the policies of the draft Plan (in particular policy GP5 'Protected Buildings' and Policy GP1 'Landscape Character and Open Land'), as indicated in the Development Brief for the site.</p> <p>With regard to the availability of the site, it was not proposed through the Call for Sites. A planning application for a residential development on the site was submitted to the Environment Department in 2008 however was withdrawn. As such the SHLAA considered the site to be developable as it did not meet the criteria to be considered deliverable on account of its availability. Similar to site SPP109 Former Priaulx Garage, whilst the subject site is within the draft St Sampson Vale Main Centre Outer Area Boundary, and as such could in principle be developed as windfall development once the Island Development Plan is adopted, it is considered that the allocation of the site for housing would maintain surety and certainty as to the future of the site and assist in finalising its redevelopment. It is acknowledged however that the site does not meet the availability criteria to be considered deliverable. However it is the Environment Department's position that weight should be given to the fact that the site has an adopted Development Brief and as such identify the site for allocation in the draft Plan.</p> <p>Taking these factors into account it was considered appropriate to take the site forward to be considered for allocation in the draft Plan.</p>
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- 4.12 The SLUP specifically requires that the HTA sites be considered for their appropriateness for future housing land supply and therefore the Environment Department has considered them ahead of other potential sites, together with Development Brief sites. In light of the above, it was considered that the significant benefits that the development of these 9 sites would have on housing and affordable housing land supply out-weighed other issues identified through the SHLAA and EIA, particularly as the majority of these issues could be satisfactorily dealt with via mitigation arising from policies in the draft Plan and assessment through project level Environmental Impact Assessment if required. As such, it was decided that these sites should be taken forward and considered for allocation for housing in the draft Plan.
- 4.13 The 9 sites discussed above could provide for between 590 and 1,225 dwellings. At the lower end of the range, this is below the minimum of 637 required to meet the 5 year land supply as of June 2014. In addition, the contribution to land supply made by existing consents tends to fluctuate over time (for example there were 643 no. dwellings permitted or under construction in Q2 2013, compared to 713 in Q4 2013). As such, the remaining sites were also evaluated further to ascertain which sites could best contribute to housing land supply.

Remaining Deliverable and Developable sites

- 4.14 The remaining deliverable and developable sites were evaluated further to assess their suitability for allocation.
- 4.15 The Environment Department took the position, in line with SLUP Policy SLP18 ‘Making the best use of land and buildings’ and SLP17 ‘Social and specialised housing provision’, to prioritise Brownfield sites that could provide for a proportion of affordable housing.
- 4.16 As such, in the context of draft Policy GP11 ‘Affordable Housing’ only the sites that could provide 5 or more dwellings at both the lower and higher density scenarios and as such contribute toward affordable housing provision were taken forward for consideration. Taking this approach, a further 16 sites were not considered further for allocation. These sites were SPP001, SPP026, SPP028, SPP034, SPP035, SSV004, SSV024, SSV036, SSV063, SSV066, SSV067, SSV069, SSV080 and SSV082.
- 4.17 In addition, only Brownfield sites were taken forward for further assessment and potential allocation. The exception in this regard was site SPP052 on account of its relationship to site SPP096 La Vrangue, set out below. On this criterion 8 sites were not considered further for allocation. These sites were SPP004, SPP012e, SPP033, SPP039, SPP139, SSV007, SSV025a&b, SSV068, and SSV081.
- 4.18 In addition, two sites formed part of Regeneration Areas in the draft Plan. These sites were SPP009 within the Mansell Street / Le Bordage Regeneration Area within St Peter Port Main Centre and site SSV124 (Leale’s Yard) in St Sampson / Vale Main Centre. The development of these sites would be acceptable in principle and would be managed through Policy MC11: ‘Regeneration Areas’ of the draft Plan.
- 4.19 The remaining sites were SPP010, SPP052, SPP056, SPP058/SPP059, SPP064, SPP067, SPP073, SPP075, SPP095, SPP112, SPP134, SSV035b, SSV071, SSV072 and SSV083/SSV084. These sites are evaluated further below:

Site ref. no.	Evaluation summary
SPP010 Bougourd Ford	<p>SPP010 is the ‘Bougourd Ford’ site. It is currently in private ownership and used as a car storage and parking area which relate to a car sales / mechanics business.</p> <p>The site did not conflict with other potential provisions of the draft Plan. It also had low to medium sensitivity to change in all respects of the EIA criteria.</p> <p>With regard to availability the site was proposed through the Call for Sites as being available by 2019 (the end of the existing tenant lease) however the Call for Sites submission indicates that the tenant is willing to vacate the property by 2016.</p> <p>Taking these factors into account it was considered appropriate to</p>

	take the site forward to be considered for allocation in the draft Plan.
SPP052 field at La Vrangue, Coutanchez Road	<p>This site comprises an open field adjacent to site SPP096 La Vrangue.</p> <p>The site did not conflict with other potential provisions of the draft Plan.</p> <p>Whilst the site is Greenfield (see paragraph 4.16 above), the main benefit of allocating this site would be that it could be taken forward for allocation as part of site SPP096 La Vrangue. It was considered that this would amplify the benefits accruing from the allocation and development of site SPP096 La Vrangue site and could provide additional options with regard to access for that site.</p> <p>The EIA found that the site had a high sensitivity to change with regard to heritage and landscape. With regard to landscape sensitivity, the site was surveyed as 'Route Des Coutanchez West' in the 'Survey of Important Open Land in Proposed Main Centres and Local Centres' report, November 2014. The report stated that <i>'The field is well screened and separated from the wider landscape setting of St Peter Port by the topography and the neighbouring uses and is therefore not sensitive to change in any significant way. The boundary to Rue Des Coutanchez is attractive and rural in character and contributes to the 'gateway' to Town in this location'</i> and proposed to not designate the site as open land in the draft Plan. The site is not proposed to be designated as Important Open Land in the Plan. As such it is considered that the sensitivity of the land identified in the EIA is not sufficient to inhibit the identification of the site for housing development in the Plan, particularly having regard to Policy GP1 'Landscape Character and Open Land.</p> <p>Taking these factors into account it was considered appropriate to take the site forward to be considered for allocation in the draft Plan as part of site SPP096 La Vrangue.</p>
SPP056 Sir John Leale House	<p>Sir John Leale House is currently used as a storage and distribution centre. It is a States-owned site. Whilst it is within SAMP 1 – 5 years and the site recently came up for rent, there is an existing lease on the site.</p> <p>The site did not conflict with other potential provisions of the draft Plan. It also had low to medium sensitivity to change in all respects of the EIA criteria.</p> <p>The SHLAA notes the long and narrow access to the site, as well as the area of land within the site that is in other ownership. It is also noted that the site falls within the Main Centre boundaries of the draft Plan and as such could in principle be progressed for development under the appropriate policies of the Island Development Plan as windfall</p>

	<p>development.</p> <p>Whilst the site is within SAMP 1 – 5, proposals to end the existing tenancy have not been finalised and the site may not be deliverable in the first 5 years of the Island Development Plan and as such it was not considered appropriate to rely on the site as a housing allocation.</p>
SPP058 & SPP059 Fire Station	<p>Sites SPP058 and SPP059 are hereon assessed together. The fire station and associated flats and control room is a States-owned site. It is currently a working fire station and is within SAMP 1 – 5 years, however plans have not been finalised for relocation of the station.</p> <p>In the EIA the site was considered to be of high sensitivity to change with regard to heritage issues; this is on account of its Protected Building status.</p> <p>The development of the site for housing did not conflict with other potential provisions of the draft Plan. It is noted that the site falls within the Main Centre boundaries of the draft Plan and as such could in principle be progressed for development under the appropriate policies of the Island Development Plan as windfall development, noting however the constraints upon the buildings on site due to their Protected Building status.</p> <p>Whilst the site is within SAMP 1 – 5, proposals for the relocation of the Fire Station have not been finalised and the site may not be deliverable in the first 5 years of the Island Development Plan. This, coupled with site constraints due to the Protected Buildings status of the buildings on site, it was not considered appropriate to rely on the site as a housing allocation.</p>
SPP064 Odeon Car Park	<p>The Odeon Car Park / Monument Gardens site is a States-owned public carpark.</p> <p>Its development did not conflict with other potential provisions of the draft Plan. It also had low to medium sensitivity to change in all respects of the EIA criteria.</p> <p>The site is subject to covenants which place restrictions on the pattern of development on the site, as highlighted in the SHLAA. These covenants relate to the height, footprint and use of development on site. However these restrictions have been taken into account in estimating the potential yield of development on the site and the contribution that the site could make to housing land supply. However it is noted that the site is of significance in relation to traffic and transportation considerations, due mainly to its role as a public car park.</p> <p>Taking these factors into account it was not considered appropriate to</p>

	take the site forward to be considered for allocation in the draft Plan.
SPP066 & SPP067 Education Offices	<p>Sites SPP066 and SPP067 are hereon assessed together. This site comprises a Protected Building on Grange Road which houses offices for the Education Department. The site is States-owned and is within SAMP 1 – 5 years.</p> <p>The development of the site did not conflict with other potential provisions of the draft Plan.</p> <p>However in the EIA the site was considered to be of high sensitivity to change with regard to heritage issues; this is on account of its Protected Building status. It is considered however that the issues relating to heritage sensitivity in this case could be satisfactorily dealt with via the policies of the draft Plan (in particular policy GP5 ‘Protected Buildings’).</p> <p>Taking these factors into account it was considered appropriate to take the site forward to be considered for allocation in the draft Plan.</p>
SPP073 Rue Margarite	<p>The site is a vacant plot currently used for temporary car parking. It is irregularly shaped, being effectively two sites.</p> <p>The site is States-owned and was proposed through the Call for Sites for both employment and housing development. The site is within SAMP 1 – 5 years, however is currently leased for car parking.</p> <p>It is considered that the small, irregular shape of the site, and its location at the junction of Rue Margarite, St James Street and College Street, as well as the site being proposed through the Call for Sites for both employment and housing development, reduces the extent to which the Environment Department could rely on the site for housing development. It is noted however that the site falls within the Main Centre boundaries of the draft Plan and as such could in principle be progressed as windfall development under the appropriate policies of the Island Development Plan.</p> <p>It was considered that in this context it was not appropriate to rely on the site as a housing allocation.</p>
SPP075 Police Station	<p>This site comprises the Island Policy headquarters and is a States-owned site. It is currently a working police station and is within SAMP 1 – 5 years, however plans for the relocation of the station have not been finalised.</p> <p>In the EIA the site was considered to be of high sensitivity to change with regard to heritage issues; this is on account of its Protected Building status.</p>

	<p>The development of the site for housing did not conflict with other potential provisions of the draft Plan. It is noted that the site falls within the Main Centre boundaries of the draft Plan and as such could in principle be progressed for development under the appropriate policies of the Island Development Plan as windfall development, noting however the constraints upon the buildings on site due to their Protected Building status.</p> <p>Whilst the site is within SAMP 1 – 5, proposals for the relocation of the Police Station have not been finalised and the site may not be deliverable in the first 5 years of the Island Development Plan. This, coupled with site constraints due to the Protected Buildings status of the buildings on site, it was not considered appropriate to rely on the site as a housing allocation.</p>
<p>SPP095 Braye Lodge Hotel</p>	<p>Site SPP095 is a lodging house (granted planning permission under planning application PRCN/2002/0567) known as ‘Braye Lodge Hotel’. It was proposed by the owners through the Call for Sites to be developed for housing.</p> <p>The development of the site did not conflict with other potential provisions of the draft Plan. It also had low to medium sensitivity to change in all respects of the EIA criteria.</p> <p>It is noted that the existing site is in a residential use class. Policy EMP15 of the Urban Area Plan seeks to manage the rationalisation of visitor accommodation to ensure that a sustainable level of accommodation is provided on the Island. It is noted that Policy MC8 ‘Visitor Accommodation in Main Centres and Main Centre Outer Areas’ of the draft Plan, would not inhibit the redevelopment of the site for housing development.</p> <p>Taking these factors into account it was considered appropriate to take the site forward to be considered for allocation in the draft Plan.</p>
<p>SPP112 Warry’s Bakery</p>	<p>This site is known as ‘Warry’s Bakery’. The premises was previously used as a bakery, which ceased operating in 2013.</p> <p>Its development did not conflict with other potential provisions of the draft Plan. It also had low to medium sensitivity to change in all respects of the EIA criteria.</p> <p>An outline planning application for 18 dwellings was refused by the Environment Department in April 2014 (OP/2013/4086). In the planning application decision, the principle of the redevelopment of the site for housing was considered premature under the policies of the Urban Area Plan which seek to protect the site for employment uses. The Employment Land Study considered the site appropriate for redevelopment for non-employment uses.</p>

	<p>Taking these factors into account it was considered appropriate to take the site forward to be considered for allocation in the draft Plan.</p>
SPP134 King's Club	<p>This site forms part (primarily 2 tennis courts) of the 'Kings Club' sports & leisure complex, which extends to the west.</p> <p>Its development did not conflict with other potential provisions of the draft Plan. It also had low to medium sensitivity to change in all respects of the EIA criteria.</p> <p>Planning permission was refused in 2013 (FULL/2012/3760) to remove the 2 existing tennis courts and leylandii hedge and erect 13 apartments with underground car parking and construction of a new access.</p> <p>The Planning Appeals Panel considered that the particular proposal as presented in that case would harm the character and appearance of the neighbourhood. It also found that the closure of the existing Kings Club access and its replacement as proposed would probably result in a net improvement to road safety. The impact on recreational or sporting provision was a neutral consideration. The Tribunal took the view that the site is in principle acceptable for housing development, and capable of making a valuable contribution to housing supply in a sustainable location, and that there is no reason why it should not be developed for that purpose, subject to the design meeting the relevant planning policies.</p> <p>The assessment of the site by the Traffic & Transportation Services Unit as part of the SHLAA ranked the site as 'B' and as such was carried forward for allocation. With regard to the loss of the tennis courts, it is considered that the impact on the supply of leisure and recreation uses could be dealt with through the policies of the draft Plan, in particular through policies MC9(a) 'Leisure and Recreation in Main Centres and Main Centre Outer Areas – New, and Extension, Alteration or Redevelopment of Existing Uses' and Policy MC9(B): 'Leisure and Recreation in Main Centre and Main Centre Outer Areas – Change of Use', as appropriate.</p> <p>Taking these factors into account it was considered appropriate to take the site forward to be considered for allocation in the draft Plan.</p>
SSV035b land at Saltpans	<p>This site is a Greenfield, former vinery site. It is adjacent to the west of site SSV035a / SSV121 (Greenfield land currently designated as Saltpans HTA) and is in the same ownership, but was submitted through the Call for Sites as a separate site.</p> <p>The EIA identified sensitivities to the development of the site in relation to flooding. Just over half the site is within a flood zone. As</p>

	<p>with site SSV121 Saltpans, Policy LP3 'Climate Change Adaptation' of the SLUP states that the Development Plan should enable the risk of flooding to be assessed on a case by case basis, rather than adopting a general policy approach that discourages development within vulnerable areas. It was considered that flood risk issues could be dealt with through careful design and mitigation measures which could be required under the policies of the draft Plan, primarily Policy GP9 'Sustainable Development'. However, it is acknowledged that detailed assessment of flood risk, including on the development potential and viability of the site, will be required.</p> <p>The site was surveyed as 'Nocq Road' in the 'Survey of Important Open Land in Proposed Main Centres and Local Centres' report, 2014. The report, which informs the identification of the areas of Important Open Land in the draft Plan, states that <i>'Taking into account the future development of land to west and east, this area of land will perform an important function in retaining a separation of the Bridge and the linear development along Route Militaire as part of an almost unbroken stretch of greenfield land or 'green corridor' running from Delancey Battery in the south to Route du Braye in the north. The IOL designation here should broadly correlate to the undeveloped stretch of Saltpans Road to the south and the area of IOL (Route du Braye) to the north, in order to retain a meaningful open land corridor through the settlement. This approach is taken in the absence of suitably defined boundaries on the ground'</i>. The report proposed to retain part of the area (i.e. the area correlating to the undeveloped stretch of Saltpans Road to the south and the area of Important Open Land [Route du Braye] to the north) as open land.</p> <p>Taking these factors into account it was considered appropriate to take part of the site forward to be considered for allocation in the draft Plan. This area comprises the eastern part of the site and allows the remainder of the site to be designated as Important Open Land and retain the 'green corridor' identified in the Important Open Land report. As the sites is adjacent to and in the same ownership as sites SSVV035a / SSV121 Saltpans, it is proposed to take these sites forward to be considered for allocation together in the draft Plan.</p>
SSV071 Cleveley's Viney'	<p>Site SSV071 is known as 'Cleveley's Viney' and comprises residential development, a redundant viney (c.50% of site) to the east, and Greenfield to the west.</p> <p>The EIA identified sensitivities to the development of the site in relation to flooding. C.85% of site is floodzone with land to south, east and west also floodzone. As with site SSV121 Saltpans, Policy LP3 'Climate Change Adaptation' of the SLUP states that the Development Plan should enable the risk of flooding to be assessed on a case by case basis, rather than adopting a general policy approach that discourages development within vulnerable areas. It was considered</p>

	<p>that flood risk issues could be dealt with through careful design and mitigation measures which could be required under the policies of the draft Plan, primarily Policy GP9 ‘Sustainable Development’. However, it is acknowledged that detailed assessment of flood risk, including on the development potential and viability of the site, will be required.</p> <p>Taking these factors into account it was considered appropriate to take the site forward to be considered for allocation in the draft Plan.</p>
<p>SSV072 Site at Rue de Tertre / Braye Road</p>	<p>Site SSV072 is a large, irregularly shaped site comprising a mix of Greenfield and Brownfield land, including dwellings and a Protected Building. The site comprises the area covered by the Rue du Tertre Development Brief (referenced in the SHLAA as SSV126) and additional land to the east and west; as such the site is assessed separately to the other sites with Development Briefs above.</p> <p>The development of the site did not conflict with other potential provisions of the draft Plan.</p> <p>In the EIA the site was considered to be of high sensitivity to change with regard to heritage issues; this is on account of the Protected Building status of the ‘Le Tertre’ Protected Building.</p> <p>Planning permission for 51 sheltered housing units (mainly FULL/2014/1938) was granted on the site in November 2014. The draft Plan does not allocate sites specifically for sheltered housing. The draft Plan supports the provision of sheltered housing developments within the Main Centre Outer Areas, such as that on the subject site, under Policy MC2: ‘Housing in Main Centres and Main Centre Outer Areas. The draft Plan also supports the provision of Affordable Housing (which can include sheltered housing) via Policy GP11: ‘Affordable Housing’ which requires affordable housing to be provided as part of proposals for the development of 5 or more private market dwellings. The draft Plan supports the provision of sheltered housing schemes such as that on the subject site, however it was considered that it would not be appropriate to rely on the site as a housing allocation for the purposes of housing land supply.</p>
<p>SSV083 & SSV084 former St Sampsons school</p>	<p>Sites SSV083 and SSV084 are hereon assessed together. This sites is States-owned and previously comprised the St Sampsons Secondary School (SSV083 alongside SSV082 above) and St Sampsons Infants School (site SSV084). The site is controlled by the Education Department, and parts of the site are now used by the College of Further Education (CFE), as part of the CFE Delancey Campus.</p> <p>Development of the site did not conflict with other potential provisions of the draft Plan. It also had low to medium sensitivity to change in all respects of the EIA criteria. It is noted that the site falls within the Main Centre boundaries of the draft Plan and as such could</p>

	<p>in principle be progressed for development under the appropriate policies of the Island Development Plan as windfall development.</p> <p>Whilst the site is within SAMP 1 – 5, proposals for the relocation of the College of Further Education have not been finalised and the site may not be deliverable in the first 5 years of the Island Development Plan. As such, it was not considered appropriate to rely on the site as a housing allocation.</p>
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- 4.20 The above assessment indicated that it was not appropriate to allocate sites SPP056, SPP058, SPP073 and SPP075. These sites were not required to meet the housing supply target and could be taken forward for development under the enabling policies of the draft Plan as windfall development as they are within the Main Centre or Main Centre Outer Area boundaries and in this way contribute to overall housing supply.
- 4.21 It was however considered that the benefits of allocating sites SPP010, SPP052, SPP066/SPP067, SPP095, SPP112, SPP134, SSV035b and SSV071 out-weighed other issues identified through the SHLAA and EIA, particularly as these issues could be satisfactorily dealt with via mitigation arising from policies in the draft Plan. As such, it was decided that these sites should be taken forward for allocation in the draft Plan.

5 Housing land supply through allocated sites in the draft Plan

- 5.1 From the final evaluation set out in Section 4 above, 15 sites are considered appropriate for allocation in the draft Plan. These sites are:
1. SPP010 Bougourd Ford
 2. SPP066 & SPP067 Education offices
 3. SPP095 Braye Lodge Hotel
 4. SPP096 & SPP052 La Vrangue
 5. SPP103 Maurepas Road
 6. SPP104 Petites Fontaine
 7. SPP109 Former Priaulx Garage
 8. SPP112 Warry's Bakery
 9. SPP134 King's Club
 10. SSV071 Cleveley's Vinery
 11. SSV120b&c Belgrave Vinery
 12. SSV121 & SSV035b Saltpans
 13. SSV122 Franc Fief
 14. SSV123 Pointes Rocques
 15. SSV129 Les Bas Courtils
- 5.2 As set out in Section 3 above, the SHLAA (June 2014) indicated that the draft Plan would be required to allocate sites to provide for at least **637** dwellings over 5 years to meet the minimum requirements of the Strategic Land Use Plan 2011 (SLUP). The development of the above 15 sites could provide for at least **718** dwellings. This means that the housing allocations, existing permissions, and windfall allowance provide for 81 dwellings more than the 1,500 minimum required by the SLUP over 5

years, in other words a c.5% surplus. However the contribution to land supply made by existing consents tends to fluctuate over time (for example there were 643 no. dwellings permitted in Q2 2013, compared to 713 in Q4 2013). As such it was considered prudent to allocate a surplus above the minimum number of dwellings required to be allocated to meet the housing target, so as to allow for future decreases in pipeline consents and ensure the minimum housing target is met over time. This approach is consistent with Policy SLP13 of the SLUP.