

**Response to a Question Pursuant to Rule 14
of The Rules of Procedure of the States of Deliberation and their Committees**

The Development & Planning Authority ("DPA") wishes to respond to the following questions submitted by Deputy Ross Le Brun pursuant to Rule 14 of the Rules of Procedure.

QUESTION 1

The total area of agricultural land which has been approved for change of use to domestic curtilage under Policy GP15 since the policy came into force.

ANSWER

The Strategic Land Use Plan ("SLUP") directs that the Island Development Plan ("IDP") should focus on maintaining and protecting the most important areas of contiguous agricultural land and other land that is well related to established agricultural operations, whilst ensuring that land remains available for other legitimate uses.

To achieve this, the IDP identifies the Agriculture Priority Area ("APA"), which represents Guernsey's most valuable agricultural land. Although the APA is not reserved exclusively for agriculture, IDP policies make clear that priority is given to the needs of commercial agriculture.

For the purposes of this response, the DPA has interpreted "agricultural land" as land within the APA. It is recognised that there will be a small proportion of land in agricultural use outside of the APA but that most of this land outside the APA is open amenity land.

The total area of land within the APA approved for change of use to domestic curtilage between 2nd November 2016 and 7th September 2026 is 99.35 vergées.

It should be noted that this figure does not necessarily represent land that was actively farmed or the amount of land lost from active agricultural production, which is likely to be considerably less. When the APA designation was identified, a broad-brush approach was taken to delineate larger swathes of agricultural land in accordance with the SLUP. As a result, some land that was not actively farmed was included within the designation.

QUESTION 2

The total area of such land that was previously actively farmed, grazed, or otherwise available for agricultural production.

ANSWER

Matters relating to agriculture and farming fall within the mandate of the Committee *for the Environment & Infrastructure* ("E&I"). The DPA understands that Agriculture, Countryside and Land Management Services holds information relating to land farmed by the dairy industry. However, while commercial agriculture in Guernsey is principally centred on dairy

farming, this information does not capture all agricultural activity and therefore does not provide a complete record of all actively farmed land across the Island.

Accordingly, the DPA is unable to provide an accurate figure in response to this question based on the information currently available.

QUESTION 3

Whether any assessment has been undertaken of the cumulative impact of these approvals on:

- **agricultural capacity;**
- **biodiversity;**
- **habitat connectivity; and**
- **Guernsey's long-term food resilience and food security objectives;**

QUESTION 4

Whether the Committee has considered the implications of the continued loss of agricultural land in light of current and future initiatives aimed at increasing local food production, enhancing biodiversity, and reducing reliance on imported food;

QUESTION 5

Whether the Committee will review, amend or remove Policy GP15 in order to provide greater protection for agricultural land and support the Island's environmental, biodiversity and food resilience objectives, and if not, why not; and

QUESTION 6

Given the finite amount of agricultural land available in Guernsey, does the Committee consider that the permanent loss of such land to private domestic gardens remains an appropriate planning objective, particularly when there is increasing emphasis on preserving the Island's rural character, open green spaces, biodiversity and opportunities for local food production, and when alternative approaches such as higher-density and upward development may reduce pressure on undeveloped land?

ANSWER

The DPA has provided a single response to Questions 3 to 6 to avoid unnecessary repetition.

The Committee *for the* Environment & Infrastructure is the body mandated to develop and implement policy relating to:

- agricultural capacity;
- biodiversity;
- habitat connectivity; and
- food resilience and food security.

The DPA's role is to deliver States' objectives through land-use planning policy.

The principal aim of the IDP is to ensure planning policies are consistent with the SLUP and assist in maintaining and creating a socially inclusive, healthy and economically robust Island, whilst balancing those objectives with the protection and enhancement of Guernsey's built and natural environment and the need to use land wisely.

The planning system therefore seeks to enhance and protect the environment of Guernsey whilst allowing for the necessary and appropriate development the Island needs to come forward. The DPA recognises that this is not an easy balance to strike.

The SLUP directs that IDP policies should balance the protection of land for the current and future needs of agriculture, recognising the industry's role in countryside management, while also ensuring land remains available for other legitimate development requirements.

The IDP (2016) introduced, for the first time, a designation that affords priority to agriculture on the Island's most valuable agricultural land through the APA. Although land within the APA is not reserved exclusively for agriculture, planning policy clearly prioritises commercial agricultural use.

Consequently, land within the APA is generally expected to remain in agricultural use unless it can be demonstrated that:

- the land can no longer make a positive contribution to commercial agriculture;
- the land is no longer required for commercial agricultural purposes; or
- the land cannot practically be used for commercial agriculture without causing adverse environmental impacts.

These provisions are contained within Policy OC5(A): Agriculture Outside of the Centres - Within the Agriculture Priority Area.

Outside the APA, no equivalent policy presumption applies. The intention is to balance agricultural interests against other legitimate land-use demands. Therefore, where policy criteria are satisfied, including consideration of landscape impacts, land in active agricultural use may be granted permission for alternative uses.

Since adoption of the IDP in 2016, the DPA has produced Annual Monitoring Reports ("AMRs") covering the period 2017 to 2021¹. These reports assess the effectiveness of IDP policies through analysis of planning applications, appeals, monitoring data and research.

The AMRs included consideration of:

- applications within and outside the APA;
- changes of use from agricultural and horticultural land to domestic curtilage; and
- development permitted within Areas of Biodiversity Importance ("ABIs"), including domestic curtilage extensions.

The monitoring undertaken up to 2021 concluded that IDP policies relating to agriculture were generally operating as intended and contributing towards the objectives of the SLUP. Consequently, no immediate amendments were considered necessary at that time.

The DPA has nevertheless continued to take account of evolving States' strategies when assessing planning applications. Since 1st September 2021, applications involving changes of

¹ To prioritise its resources, the DPA decided to pause monitoring during the Focused Review of the IDP.

land use, including domestic curtilage extensions, have been required to demonstrate biodiversity enhancement. This requirement reflects the Strategy for Nature, adopted as Supplementary Planning Guidance in July 2020.

Associated guidance has also been published to assist Islanders in protecting and enhancing biodiversity within gardens and around buildings, including advice on the establishment of wildflower meadows and suitable species selection. However, the biodiversity associated with an area of land and agricultural land use should not be conflated. Whilst some areas of agricultural land may be biodiverse others are notably lacking due to agricultural practices whilst some areas of domestic curtilage may be high in biodiversity. The change of use of agricultural land to domestic curtilage does not necessarily result in a loss of biodiversity and the DPAs additional requirements makes sure that every opportunity is taken to enhance biodiversity. This is however, separate to the matter of how much land is available for agricultural production.

The Focused Review of the IDP commenced on 25th January 2023. Its primary purpose has been to address housing land supply, housing delivery and employment land supply, while also allowing updates in response to monitoring findings, evidence and research.

Although agricultural policies, including Policy GP15, were not included within the scope of the Focused Review, the DPA has proposed, of relevance, several amendments relating to Areas of Biodiversity Importance.

Looking ahead, the Committee *for the Environment & Infrastructure* is expected to consider in 2027 whether a review of the SLUP is required and, if so, its appropriate scope. The DPA has committed to undertaking a full review of the IDP by the end of 2030. This will allow for the completion of the Focused Review, and the time for the consideration and potential review of the SLUP.

That review will consider all relevant IDP policies, including Policy GP15. At this stage, however, the DPA cannot determine before that work is undertaken whether amendment or removal of any specific policy will be required.

Overall, moving forward, while matters relating to biodiversity and increasing local food production and reducing reliance on imported food fall within the mandate of the Committee *for the Environment & Infrastructure*, any wider States objectives or initiatives relevant to land-use planning will be considered and inform any future IDP reviews by the DPA.

On the specific point of 'food resilience', the President of the Development & Planning Authority has created a small work group to ascertain whether there is a demand for more access to Agricultural Land for the purposes of domestic food production. The UK definition of 'small holding' is an area between one and fifty acres. There is a developing theme of a variation of that definition for the Guernsey context of smaller parcels of land. There are further thoughts developing quite quickly on what the DPA may be able to change through flexing its existing policies and what amendments would need to come to the States for agreement or ratification.

Guernsey imports some 98% of its food; the work group along with a number of other Deputies believe there is a pent-up demand for greater access to Agricultural Land and flexing the policies to allow more infrastructure on those fields and parcels are worth considering.

The DPA is also proposing reforms to streamline the plan-making process which are expected to be debated this Autumn. Subject to States' approval, these measures would allow amendments to planning policy to be made more efficiently between full plan reviews, enabling the Authority to respond more effectively to changing circumstances.

In summary, the DPA is required to keep planning policy under review and will continue to make changes where necessary.

Date of Receipt of the Questions: 27th August 2026

Date of Reply: 17th September 2026