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ITEM DEFERRED FROM MEETING ON 18TH MARCH, 2020

3. Development & Planning Authority - The Island Development Plan – Five Year Review of the Island Development Plan, P.2020/23

THE STATES OF DELIBERATION
of the
ISLAND OF GUERNSEY

DEVELOPMENT & PLANNING AUTHORITY

THE ISLAND DEVELOPMENT PLAN – FIVE YEAR REVIEW OF THE ISLAND DEVELOPMENT PLAN

The States are asked to decide:-

Whether, after consideration of the Policy Letter of the Development & Planning Authority entitled 'Five Year Review of the Island Development Plan' (dated 10th February, 2020), they are of the opinion:-

1. To note:
   (a) the Annual Monitoring Report 2018 of the Island Development Plan policies attached at Appendix 1 to the Policy Letter; and
   (b) that the Development & Planning Authority has an obligation under the statutory Island Development Plan 2016 ("IDP") to review Housing land supply and Employment land supply within five years of the adoption of the IDP by the States in November 2016 ("the Five Year Review") and additionally has committed to review Areas of Biodiversity Importance and, as such, these matters will be included in the Five Year Review.

2. To direct the Development & Planning Authority, in consultation with all relevant Committees and stakeholders, to extend the current scope of the Five Year Review of the IDP to include specific reviews of:
   (a) Development Frameworks thresholds and process;
   (b) development of greenfield land and prioritisation of brownfield land for residential purposes in Centres;
   (c) Important Open Land;
   (d) Agriculture Priority Areas; and,
   (e) visitor accommodation,

   as further detailed in Appendix 3 to the Policy Letter.

3. To direct the Development & Planning Authority and the Committee *for the* Environment & Infrastructure following the Five Year Review and in compliance with all relevant requirements of planning legislation, to –
   (a) take all necessary steps towards the holding of a Planning Inquiry to consult on and consider any proposed amendments to the IDP that the Development & Planning Authority considers are required as a result of the evidence gathered for the Five Year Review; and,
   (b) following the Planning Inquiry, for the Development & Planning Authority to

lay proposals for amendments to the IDP before the States for adoption by November 2021.

The above propositions have been submitted to Her Majesty's Procureur for advice on any legal or constitutional implications in accordance with Rule 4(1) of the Rules of Procedure of the States of Deliberation and their Committees.

THE STATES OF DELIBERATION
of the
ISLAND OF GUERNSEY

DEVELOPMENT & PLANNING AUTHORITY

THE ISLAND DEVELOPMENT PLAN – FIVE YEAR REVIEW OF THE ISLAND DEVELOPMENT PLAN

The Presiding Officer
States of Guernsey
Royal Court House
St Peter Port

10th February 2020

Dear Sir

1. Executive Summary

1.1 The Island Development Plan (IDP) prepared by the Development & Planning Authority (D&PA) under section 8 of the Land Planning and Development (Guernsey) Law, 2005 (the 2005 Law) sets out the land planning policies for the whole of Guernsey in a single document.

1.2 The IDP is a plan rather than a strategy and contains, for the first time in a States' development plan, a statutory requirement for the monitoring its policies. The monitoring is undertaken to ensure that the IDP remains effective and relevant and can continue to deliver the land use aspects of the States priorities and so that any necessary adjustments can be made if the monitoring process reveals that changes are needed. This enables the IDP to maintain sufficient flexibility to adapt to changing circumstances.

1.3 The IDP was approved by the States in 2016 and has a ten year lifespan. Although there is regular monitoring throughout its life, the IDP sets out that there will be a review of housing land supply and employment land supply after five years, unless monitoring indicates a more urgent need to review the land supply sooner. The five year review was therefore only intended to be a review of Housing Land Supply and Employment Land Supply.

1.4 The first IDP Annual Monitoring Report (AMR), for 2017, was published in August 2018. This concluded that there was no need to amend either the SLUP or IDP at that time as the policies, approved by the States in November 2016, remained relevant and effective. The AMR did however set out a range of actions for the

D&PA to keep certain issues under review and to provide greater clarity and guidance where needed.

1.5 The 2017 AMR was made available to the States for information as an Appendix Report in November 2018. During debate a range of issues of concern were raised. To address these concerns, the D&PA began working on an Action Plan which was finalised and published in June 2019.

1.6 A Requête entitled 'Island Development Plan' was debated by the States in July 2019. During the debate the D&PA made a commitment to lay before the States the IDP Annual Monitoring Report for 2018 in support of propositions regarding the scope of the five year review with an attached Policy Letter. This Policy Letter and propositions provides the States with an opportunity to direct the scope and purpose of the five year review of the IDP consistent with the planning legislation.

1.7 The intention of the propositions is to allow the States to debate and agree the scope of the 5 year review beyond the requirements in the IDP and so that there is continuity over the change in Government. As the propositions encompass the commitment set out in the D&PA's Action Plan in this regard, this will also give the opportunity for the States to formally endorse those commitments.

1.8 Under the planning legislation the States may direct the D&PA to prepare proposals for amendments to the policies in the Island Development Plan but the legislation provides for any such proposals to be subject to public comment, including a public inquiry conducted by a professional planning inspector, before they are laid before the States for adoption. Therefore, whilst the D&PA can be directed to prepare amendments, it cannot be amended by States resolution at this stage, without a prior public inquiry, as that would be inconsistent with the legislation.

1.9 The D&PA in response to feedback, through its Action Plan and having considered the data and evidence about the effectiveness of the IDP policies provided by the 2017 and 2018 AMRs, has concluded that the five year review should encompass a number of elements. These are:

- The requirements set out in the statutory plans i.e. the SLUP and the IDP;
- Matters committed to at the IDP Planning Inquiry;
- Commitments made through the D&PA's Action Plan; and,
- Any matters that have emerged through regular monitoring of the effectiveness of IDP policies.

1.10 Proposition 2 relates to those matters that are not a requirement under the statutory plans as the D&PA is already obliged to consider these in the review. In addition, a commitment was made by the former Environment Department

during the IDP public Planning Inquiry hearings to re-survey and update some Areas of Biodiversity Importance (ABIs) and to carry out island wide analysis to identify any additional ABIs. This project was initiated in 2019 as part of the five year review.

1.11 The additional areas of focus proposed by the D&PA to be addressed in the review as set out in the D&PA's Action Plan are:

- Development Frameworks (DFs) thresholds and process;
- Development of greenfield land and prioritisation of brownfield land for residential purposes in Centres;
- Important Open Land;
- Agriculture Priority Areas; and,
- Visitor accommodation,

as further explained in the Appendix 3.

1.12 Work is underway on the elements of the review required under the statutory plans and the project is on track for the delivery of the review by November 2021. Stage 1, research and information and evidence gathering, is ongoing and expected to continue, primarily, through to the first half of 2020. The drafting of any policy amendments in response to the evidence gathered will be in Stage 2 and will continue through the second half of 2020. There will be some overlap naturally between Stage 1 and 2.

1.13 Following on from the further research and analysis to provide the evidence required, the D&PA, under its mandate, will decide, based on the evidence, if any amendments to the IDP are required. Should the D&PA conclude that the IDP needs amendment, a Planning Inquiry into the draft amendments will be required led by an independent Planning Inspector. The Inspector will, in particular, examine the evidence to assess whether it is a robust and credible basis for the amendments proposed, that there are clear mechanisms for implementation of the policies and that they are reasonably flexible to allow them to deal with changing circumstances. The process includes statutory public consultation. The results of this process will inform an amended IDP which would then be brought to the States for adoption. In the event the D&PA decide no amendments to the IDP are required, the D&PA will return to the States with a Policy Letter explaining the recommendation. This would include what, if any, further action may be required either by the D&PA or other Committees of the States identified as a result of the five year review.

1.14 If the States decide, by amendment to the Propositions of this Policy Letter, that it is appropriate to add further workstreams or to otherwise expand the scope of this five year review, additional financial and staff resources will be required for any extra work to ensure that the review is carried out in the timeframe

statutorily required. The extent of additional resources required would be dependent on the nature of the addition to the scope.

2. Background

The Island Development Plan

2.1 The 2005 Law provides for the Strategic Land Use Plan (SLUP) to set out Strategic Land Use Objectives which guide and direct the D&PA in the preparation of Development Plans and the detailed land use policies set out within them. The SLUP was approved by the States in 2011. The IDP provides these detailed land use policies replacing the Urban Area Plan and the Rural Area Plan, which were prepared under strategic policies that were over 10 years old at the time those plans were in force and so out of date. The IDP was approved unanimously by the States in November 2016 and came into effect immediately.

2.2 The IDP sets out the factors that will be taken into account by the D&PA in reaching decisions on applications for planning permission. In conjunction with the provisions under the 2005 Law, the planning policies of the IDP also set out the detailed criteria and policies against which development proposals should be assessed. Only a minor departure can be made by the DPA from the IDP under the 2005 Law.

2.3 The Land Planning and Development (Plans) Ordinance, 2007 states that a Development Plan has a ten year lifespan. This can be extended by resolution of the States.

Monitoring the Island Development Plan

2.4 The IDP contains a requirement for the monitoring of elements of its policies. The monitoring is undertaken to ensure that the IDP remains effective and relevant and can continue to deliver the land use aspects of the States' priorities and so that any necessary adjustments can be made if the monitoring process reveals that changes are needed. This enables the IDP to maintain sufficient flexibility to adapt to changing circumstances.

2.5 Monitoring is required to provide a detailed understanding of the performance of planning policies over time, in the delivery of the objectives of the SLUP, other States of Guernsey priorities and the purposes of the 2005 Law. The IDP monitoring process helps to identify whether there is a need to review the States' strategic land use policies in the SLUP and/or undertake a partial or full review of the IDP or prepare a new statutory Plan.

2.6 The D&PA measures the performance of the IDP by assessing how effective its policies are in delivering its Principal Objectives, as set out in Part Two of the IDP. These are to:

- make the most effective and efficient use of land and natural resources;
- manage the built and natural environment;
- support a thriving economy;
- support a healthy and inclusive society;
- ensure access to housing for all; and,
- meet infrastructure requirements.

2.7 A set of key indicators and targets have been developed to allow direct and indirect effects to be monitored. Indicators provide a consistent basis for monitoring and a measure of overall progress to establish the means to identify where the IDP policies may need to be strengthened, maintained or changed in some way.

2.8 The SLUP states that "to ensure the Development Plans successfully deliver the land use objectives of the States, as set out within this Strategic Land Use Plan, the Strategic Land Planning Group [responsibilities now within the mandate of the Committee *for the* Environment & Infrastructure] will work closely with the Environment Department [responsibilities now within the mandate of the D&PA] to monitor key Development Plan policies in order to assess their robustness, continued relevance and effectiveness".

2.9 The D&PA provides regular monitoring reports to the Committee *for the* Environment & Infrastructure (C*f*E&I) setting out how the IDP is satisfying the strategic land use requirements of specific economic, social and environmental objectives of the States.

2.10 These monitoring reports are provided at quarterly intervals and on an annual basis (Quarterly Monitoring Reports and Annual Monitoring Report – QMRs and AMRs) consistent with the specific directions and guidance to the D&PA relating to monitoring and review requirements in the SLUP. The frequency of the reporting process ensures that the D&PA can respond efficiently to changing circumstances and take early action to overcome barriers to delivery, or review policy approaches to meet changing circumstances. The monitoring reports identify areas for further monitoring and have the following objectives:

- assess the implementation of the SLUP policies through the IDP policies and the management of development;
- identify and remove any blockages to the delivery of sustainable development for which provision is made within the SLUP;
- identify potential revisions required to the SLUP or IDP to ensure the objectives of the States are adequately satisfied by the land use planning system.

2.11 Effective monitoring requires the gathering and analysis of a considerable

amount of wide ranging data over time and input and feedback from other States' Committees, stakeholder groups and the public. The SLUP requires IDP monitoring reports to indicate the responses of other States' Committees and members of the public to the implementation of policies within the IDP and whether any need for policy change has been identified. The D&PA liaises with other relevant bodies to produce the Monitoring Reports. Monitoring is also important to enable communities and interested parties to be aware of how the IDP policies are working. The monitoring reports are made publicly available.

Review of the Island Development Plan

2.12 If, through monitoring, it appears that policies are not effective at delivering the objectives of the States of Guernsey, as set out in the SLUP, the following mechanisms may be triggered:

- review of the relevant policies of the IDP;
- provision of updated or new guidance or evidence as required;
- review of housing land supply and allocated sites for housing;
- review of employment land supply and land allocated for employment uses;
- action to help bring forward sites for development, wherever possible in partnership with landowners and developers;
- action to help secure the timely provision of infrastructure.

2.13 In accordance with the requirements of the SLUP the IDP identifies a minimum five year land supply for housing. The SLUP also requires the provision of a comprehensive range of land opportunities for employment uses. Therefore, although there is regular monitoring throughout its ten year life span, the IDP sets out that there will be a review of housing land supply and employment land supply after five years, unless monitoring indicates a more urgent need to review the land supply sooner. The five year review is therefore only intended to be a review of housing land supply and employment land supply and is not a full Plan review.

2.14 The five year review of housing land supply and employment land supply necessitates a comprehensive review of key aspects of the evidence base. To assess the appropriate level of provision of land for housing development and employment related development for the remainder of the IDP period, this will require a comprehensive review of the Strategic Housing Land Availability Assessment and the Employment Land Study.

2.15 A review of the IDP may be considered necessary for a variety of reasons. This could be:

- because some of the policies are not fulfilling the States' strategies;
- because some of the policies approved in November 2016 are not fulfilling their original purpose;
- because the D&PA and/or the States consider that the approved policies of

the IDP, whilst fulfilling their original purpose, are not working as intended in practice or their original purpose has changed.

2.16 Any change to policies would be subject to the Planning Inquiry procedure set out under the planning legislation; this will in nearly all cases include an inquiry hearing and may include an Environmental Impact Assessment of certain plan policies as part of the review and the accompanying Environmental Statement would be updated accordingly.

Inspectors' comments and recommendations regarding monitoring and review of the Island Development Plan

2.17 When the Independent Planning Inspectors carried out a public Planning Inquiry into the draft IDP, they made a number of comments and recommendations, which were considered by the States, with regard to monitoring the implementation of the IDP and the possible need for a review of the Plan. The key areas for monitoring were considered to be:

- the split between housing development in the Main Centres and Main Centre Outer Areas and elsewhere;
- change in the States Strategic Housing Indicator;
- the effectiveness of Affordable Housing policy in terms of the viability of development – although the Inspectors' comments related to the draft IDP policy which had a significantly lower threshold for Affordable Housing being required (sites providing 5 or more new dwellings) than the policy approved by the States (20 or more new dwellings);
- change of use of visitor accommodation; and,
- the Designation of a Local Centre at Les Capelles.

3. The Annual Monitoring Reports and the D&PA's Action Plan

3.1 The 2017 and 2018 Annual Monitoring Reports have provided valuable data and evidence to support the identification of potential areas of focus for the five year review of the IDP. The 2018 Annual Monitoring Report (AMR) is provided as Appendix 1.

2017 Annual Monitoring Report

3.2 The first IDP Annual Monitoring Report (AMR), for 2017, was published in August 2018. This concluded that there was no need to amend either the SLUP or IDP at that time as the policies remained relevant and effective. The AMR did however set out a range of actions for the D&PA to keep certain issues under review and to provide greater clarity and guidance where needed.

3.3 The 2017 AMR was made available to the States for information as an Appendix Report in November 2018. During debate a range of issues of concern were

raised including:

- development of open areas of land in built up areas;
- the DFs' process and effectiveness;
- infrastructure (primarily roads) capacity to deal with new development;
- progress with Regeneration Areas;
- effectiveness of Affordable Housing policy; and,
- progress with Community Plans.

The D&PA Action Plan

3.4 To address these concerns and those voiced in responses to consultation on draft DFs and in respect of specific planning applications, the D&PA began working on an Action Plan which was finalised and published in June 2019 (see Appendix 2). The Action Plan sets out steps to be taken in this term including how the D&PA intends to communicate progress.

3.5 In addition, during the 2017 AMR States' debate, various questions were raised by States Members on behalf of the public. Short answers to these questions have been provided in a FAQs document on the States' website. An update on progress with the Action Plan was added to the States' website in December 2019. Many of the actions have been completed with the remainder on track for completion by the end of June 2020 as planned. The update includes a 'Dashboard'. This is a snapshot of the most frequently asked statistics such as the number of planning permissions and completed residential units in a given area and the number of affordable homes that have been given planning permission. This is part of the D&PA's commitment to improve communication and follows on from the initial community workshop on Community Plans and public event "The Best Way to Have Your Say" and the publication of the FAQs.

3.6 One of the D&PA's agreed actions in was 'to scope out the five year review' and include further specific topics within this review and these are referenced in section 4 below.

3.7 A Requête entitled 'Island Development Plan' was debated by the States in July 2019. During the debate the D&PA made a commitment to lay before the States the IDP Annual Monitoring Report for 2018 in support of propositions regarding the scope of the five year review with an attached Policy Letter. This Policy Letter and propositions provides the States with an opportunity to direct the scope of the five year review of the IDP consistent with planning legislation and the purpose of the review. The intention of the propositions is to allow the States to debate and agree the scope of the 5 year review beyond the requirements in the statutory plans so that there is continuity over the change in Government. As the propositions encompass much of the commitment set out in the D&PA's Action Plan this will also give the opportunity for the States to formally endorse those commitments.

2018 Annual Monitoring Report

3.8 The 2018 AMR includes 14 'thematic reports' and follows the same format as the 2017 AMR. The reports include updates on actions from the 2017 report and where relevant include proposed actions. The actions are summarised at the end of each thematic report. The conclusions of the AMR 2018 are set-out in the section 'Effectiveness of the Policies of the IDP to Deliver the Plan Objectives and the Proactive Elements of the Linking Policies of the Strategic Land Use Plan'. The responses from Committees are attached to the AMR, with the exception of the response from the Committee *for* Education, Sport & Culture (ESC) as the Committee requested that its response remain confidential.

3.9 In general, the AMR 2018 has found that the IDP policies continue to perform as intended and contribute towards delivering the Plan Objectives and the proactive elements of the Linking Policies[1] of the SLUP. There has been generally positive feedback on the IDP from Committees and stakeholders, but monitoring has highlighted that, in a small number of instances, it will be important to provide clarity and guidance to ensure IDP policies are fully understood so that they can perform as intended and deliver the Plan and SLUP objectives.

3.10 In addition, the 2018 AMR has identified that there are a number of matters that require further research to fully understand the issues and the most appropriate way forward including whether amendment of policies is required. These issues have informed the scope of the five year review.

3.11 In 2018 there was a high rate of approval of planning applications (only 37 applications were refused out of 1550 applications determined in the year, 2.4% - up from 1.7% in 2017).

3.12 There was a low rate of planning applications approved as a 'minor departure' from the IDP policies in 2018 (2 permissions). This illustrates how the positivity and flexibility of the policies of the IDP, as required by the SLUP, along with encouragement of high quality pre-application discussions, have enabled positive outcomes to be reached for the vast majority of planning applications, and potentially costly appeals avoided. 4 appeals against the refusal of planning permission were determined in 2018 and all 4 appeals were dismissed. There were no appeals against refusal of planning permission made during 2017.

3.13 Given that work on the five year review is underway, this is considered the best process to research the issues and make further amendments to the IDP, if

[1] The SLUP requires annual monitoring to assess how the IDP is delivering the proactive elements of SLUP's Linking Policies – these are the 13 policies in section 5 of the SLUP. These policies highlight the linkages that exist between land uses, activities and development types and identify opportunities for working in a joined-up way to better meet the overarching objectives of the States.

required, alongside the required review of housing and employment land supply. A number of issues are linked and need to be addressed together and by setting out all of the issues and potential amendments to the IDP in one consultation process this will help to ensure effective engagement. Therefore, the 2018 AMR does not propose to amend the SLUP or to amend the IDP prior to the 5 year review.

3.14 The C*f*E&I was consulted requesting if it had any intentions as regards the SLUP or comments on strategic land planning given the conclusions of the draft AMR 2018. There were no recommendations in the draft AMR 2018 to revise the SLUP. The C*f*E&I responded that it generally agrees that the IDP is delivering the objectives of the SLUP and can support delivery of the States priorities and the Committee has not identified any evidence of need to amend the IDP policies at this time. The Committee also concludes that the SLUP is delivering what was intended by the States and there is no evidence of need to re-visit the States' clear decisions of policy principle in terms of the spatial distribution of development.

4. Proposed Areas of Focus for the Five Year Policy Review

4.1 The D&PA is already under a requirement in the IDP to review certain aspects of the IDP after 5 years of its life and, in response to feedback and having considered the data and evidence about the effectiveness of the IDP policies provided by the 2017 and 2018 AMRs, has concluded that the five year review should encompass a number of elements. These are:

- the requirements set out in the SLUP and the IDP;
- matters committed to at the IDP Planning Inquiry;
- commitments made through the D&PA's Action Plan; and,
- any matters that have emerged through regular monitoring of the effectiveness of IDP policies.

4.2 Robust and credible evidence will be required as the basis for any amendments. A number of issues are linked and need to be addressed together and by setting out all of the issues and potential amendments to the IDP in one consultation process this will help to ensure effective engagement. The D&PA has commenced work on the 5 year review of parts of the IDP.

4.3 The areas of focus proposed by the D&PA to be addressed in the review are set out below. It is recognised that there is overlap between some of these issues. Determining appropriate amendments to the IDP following the outcomes of a broad range of research will require a balancing of often competing requirements. The rationale for any amendments to the IDP would be considered as part of the Planning Inquiry process.

Statutory Plan Requirements

4.4 The first proposition relates to those matters that are a requirement under the statutory plans which the D&PA is obliged to consider in the review. In relation to housing land supply and policy, the D&PA concluded this includes a review of Affordable Housing policy. This will also encompass analysis to meet the requirements of the States Resolution No. 8 of 2nd November, 2016 concerning Billet d'État No XXVII of 2016, to examine the case for an alternative requirement for developers to make a tariff payment equivalent to the value of the land which Policy GP11 would require to be set aside for Affordable Housing.

Commitments Made During the IDP public Planning Inquiry

4.5 A commitment was made by the former Environment Department during the IDP public Planning Inquiry hearings to re-survey and update some Areas of Biodiversity Importance (ABIs) and to carry out island wide analysis to identify any additional ABIs. This project was initiated in 2019 as part of the five year review. Technical work is underway. This will provide guidelines and criteria for the selection of ABIs, a survey of ABIs not supporting the Sites of Special Significance ("SSS") to assess their particular biodiversity interest and any threats to it and will provide a recommendation of whether or not each site meets the guidelines and criteria for designation as a SSS. This will include a review of the 2018 Habitat Survey. The information and evidence provided by this work will enable a more targeted and robust application of the IDP policies, increasing their effectiveness in delivering the intentions of the SLUP and the Biodiversity Strategy. Therefore the ongoing technical work in relation to ABIs. is not included in Proposition 2.

Commitments Made in the D&PA's Action Plan

4.6 Additional areas of focus were proposed to be included and set out in the D&PA's Action Plan. These are:

- DFs' thresholds and process;
- development of greenfield land and prioritisation of brownfield land for residential purposes in Centres;
- Important Open Land;
- Agriculture Priority Areas; and,
- Visitor accommodation,

as further detailed in Appendix 3.

4.7 Following on from the further research and analysis to provide the evidence required, the D&PA, under its mandate, will decide, based on the evidence, if any amendments to the IDP are required. Should the D&PA conclude that the IDP needs amendment, a Planning Inquiry into the draft amendments will be required led by an independent Planning Inspector. The Inspector will, in

particular, examine the evidence to assess whether it is a robust and credible basis for the amendments proposed, that there are clear mechanisms for implementation of the policies and that they are reasonably flexible to allow them to deal with changing circumstances. The process includes statutory public consultation and in nearly all cases an inquiry hearing. The results of this process will inform an amended IDP which will then be brought to the States for adoption.

4.8 Set out in Appendix 3 is an indication of the proposed scope of the technical work required for each of the additional areas of focus. This includes the policy context, relevant findings from the 2018 AMR and direction from the D&PA Action Plan for each area. If the States decide it is appropriate to add further workstreams or to otherwise expand the scope of this five year review, additional financial and staff resources will be required for any additional work to ensure that the review is carried out in the timeframe statutorily required. The extent of additional resources required would be dependent on the nature of the addition to the scope.

5. Emerging Policy Issues

5.1 The 2018 AMR analyses planning applications and appeals data for 2018 but also includes updates to May 2019 on relevant strategies and policies with land use implications. A number of relevant documents have been published since then that will be considered as part of the five year review to assess if any amendment is needed to the IDP. These include the Policy & Resource Plan 2018 Review and 2019 Update – this was debated in June 2019 and introduces the priority policy area Mitigate Climate Change. The resolutions of 28th June, 2019 on Billet d'État No IX of 2019 require the C*f*E&I to develop a climate change policy and a 'Climate Change Action Plan' in a Policy Letter no later than May 2020. This will include proposals for any local action to mitigate climate change and environmental degradation and local policies to stimulate the 'green' and 'blue' economy and promote environmentally sustainable economic development.

5.2 As part of the work on the 5 year review, the D&PA will also review the 2018 Habitat Survey, the Joint Strategic Needs Assessment for People Over 50 and the Energy Policy. In addition there are a number of longer term areas of policy development that are likely to have implications for the IDP and these have been noted by the D&PA and they can be addressed through amendment of the IDP as and when required between the completion of the five year review and the likely replacement of the IDP at the 10 year point. These include the Long-term Infrastructure Investment Plan, the Seafront Enhancement Area programme, implementation of the Economic Development Strategy, implementation of the Housing Strategy and implementation of the Future Model of Care (Partnership of Purpose).

5.3 In addition, overlapping with the work on the 5 year review, the D&PA has been directed by the States to prepare proposals for a local development strategy for the St Peter Port Harbour Action Area and, with the C*f*E&I, to take all necessary steps to lay proposals before the States. The IDP already provides the necessary policy framework to progress such a strategy and this project does not impinge on progress with the Plan review.

6. Resources and Implementation

6.1 It is a requirement under the statutory plans to review elements of the IDP at the 5 year point (2021) and a budget is in place for the technical work as outlined above and in the D&PA's proposed scope of review indicated in Appendix 3 and Propositions 1 and 2. A Planning Inquiry is part of the statutory process and the C*f*E&I will need to budget for a Planning Inquiry in 2021. A preliminary estimate is that this would cost in the region of £100,000, with the costs dependent on the level and complexity of representations made during the Planning Inquiry. There is no requirement for the drafting of any legislation.

6.2 However, if the States decide it is appropriate to add further workstreams or to otherwise expand the scope of this five year review, additional financial and staff resources will be required for any additional work to ensure that the review is carried out in the timeframe statutorily required and any extension to the Public Inquiry. The extent of additional resources required would be dependent on the nature of the addition to the scope.

6.3 For some areas of focus there are emerging policies with implications for the IDP, as noted above. Should the policies be approved by the States, they may necessitate amendment of the IDP. As it is a requirement under the statutory plans to review the IDP at the 5 year point, should these documents not be available in time to be included in the Planning Inquiry process, the D&PA will progress using the most up to date information available to it at the time. Timely review of the IDP is needed to ensure it remains fit-for-purpose. It will be possible to amend the IDP between the five year review and the ten year/ end life review of the Plan (2026), subject to the statutory process as set out below.

7. Engagement and consultation

7.1 No specific further consultation has been carried out for this Policy Letter. The D&PA does however continue to engage on an ongoing and regular basis with other States Committees regarding policy matters with land use implications and in relation to the Annual and Quarterly Monitoring Report process. Consultation will also continue at various stages of the five year review and will include

statutory consultation during the Public Inquiry.

8. Compliance with Rule 4 of the Rules of Procedure

8.1 Rule 4 of the Rules of Procedure of the States of Deliberation and their Committees sets out the information which must be included in, or appended to, motions laid before the States.

8.2 A Planning Inquiry would incur costs for the C*f*E&I, information is provided in Section 6. If the States decide it is appropriate to add further workstreams or to otherwise expand the scope of the five year review, additional financial and staff resources will be required for any additional work to ensure that the review is carried out in the timeframe statutorily required and any extension to the Public Inquiry. The extent of additional resources required would be dependent on the nature of the addition to the scope. It would be for any Deputy proposing an amendment to estimate the cost.

8.3 In accordance with Rule 4(4) of the Rules of Procedure of the States of Deliberation and their Committees, it is confirmed that the Propositions above have the unanimous support of the D&PA.

8.4 In accordance with Rule 4(5), the Propositions relate to the duties of the D&PA in respect of preparing development plans. Information on consultation carried out is provided in section 7 above.

Yours faithfully

Development & Planning Authority

D A Tindall
President

V S Oliver
Vice President

B J E Paint
L C Queripel
E A J Snowdon

Annual Monitoring Report, 2018

With updates to May 2019

Development & Planning Authority

Guide to the Annual Monitoring Report

This is the Island Development Plan (IDP) Annual Monitoring Report (AMR) for 2018. This is the second AMR for the IDP, which was adopted by the States in November 2016.

Monitoring of the IDP is a statutory requirement on the Development & Planning Authority (the Authority). The Authority's mandate includes advising the States on land use policy and developing and implementing land use policies through development plans (such as the IDP) and any other relevant instruments. It has the responsibility for preparing development plans, subject plans, local planning briefs, guidance notes and development frameworks. The Authority also has a duty to determine development applications of all kinds, including planning, building control, protected buildings and monuments and scheduled sites. The Authority is supported by the Planning Service.

Ensuring that the IDP remains effective and relevant requires on-going monitoring of the success and progress of its policies, to make sure it is achieving its objectives, the objectives of the Strategic Land Use Plan, 2011 (SLUP) and is able to support the delivery of the States priorities as set out in the Policy & Resources Plan (also known as the Future Guernsey Plan and referred to as such throughout the AMR). An AMR is a comprehensive report that contains both quantitative and qualitative information, analysing the effectiveness and relevance of IDP policies, including feedback from stakeholders and relevant Committees, and sets out actions, if any, that need to be taken. The AMR also assesses if the IDP is playing its part in enabling the proactive elements of the SLUP to be delivered.

The AMR 2018 concludes that the policies of the IDP continue to be effective, robust and relevant. The IDP is performing as intended, is flexible and is delivering the land use requirements of the States as required by the SLUP. No specific blockages have been identified to delivering these requirements. Therefore, at this stage, there is no proposal to amend the IDP and there is no evidence of a need to amend the SLUP.

This AMR is available online on the States' website here: www.gov.gg/planningpolicy. The website also has IDP Quarterly Monitoring Reports, the IDP and all the documents associated with it. This includes a number of technical studies completed in support of this AMR – a Main Centres Survey, Local Centres Survey and update to the Employment Land Study.

The AMR refers to a number of forthcoming States' debates on issues such as transport. Information on States' meetings is available here: https://www.gov.gg/parliament or by contacting the Greffe on 725277.

The AMR monitors planning applications and planning appeals determined in 2018. The report was drafted between March and May 2019 and includes reference to any relevant strategies published or States' decisions up to the end of May 2019. Relevant documents published since then that will be considered in future monitoring include:

- the Policy & Resources Plan 2018 Review and 2019 Update – this was published in May 2019 so reference is made where relevant in the AMR, but no updates are given for the outcome of the States debate of the policy letter at the June 2019 meeting.

N.B. the Policy & Resources Plan is also known as the Future Guernsey Plan and is referred to as such throughout the AMR.

- a Development & Planning Authority Action Plan – this was published in June and can be found here: https://www.gov.gg/dpaplan2019 The Action Plan addresses a number of issues raised in both the 2017 AMR (and the 2018 AMR), in addition to issues raised during the States debate of the 2017 AMR in November 2018; following the publication of the 2017 AMR in August 2018, the Authority decided to include the AMR as an appendix to the Billet d'État No. XXV in November 2018 to ensure all Members were aware of the document.

If you have any queries about this AMR please get in touch – see the Contact Us page at the end of the document. If you would like to be kept up-to-date with progress with the implementation of the Island Development Plan including the publication of any documents such as Development Frameworks, please let us know and we can add you to the Planning Service's Plan Review database. Further information on the work of the Planning Service, including planning applications and decisions, is available here: https://www.gov.gg/planningandbuilding

Structure of the Annual Monitoring Report

The Introduction section of the AMR includes details of the IDP, the monitoring of the IDP, the Planning Inspectors' comments and recommendations regarding monitoring and review of the IDP, the consultation and engagement carried out for the AMR and the data sources for the AMR.

The introduction to Section 2 of the AMR (Monitoring Policy Performance) sets out how the thematic reports have been produced.

Monitoring of different types of development is an important component in helping to digest trends and assess effectiveness of planning policies, and as such the Monitoring Policy Performance section (Section 2) includes 14 thematic reports that consider the effectiveness and continued relevance of some of the key policies in the IDP in delivering the IDP objectives, the SLUP objectives and the priorities of the States - there are 6 Plan Objectives which are listed below. Please see the IDP here for further information: www.gov.gg/planningpolicy.

The thematic reports propose actions as required to address any issues identified and include an update on the monitoring requirements and actions identified in each thematic report of the previous AMR. The reports can be read separately or as part of the whole AMR.

The thematic reports are:

- Strategic Development and Infrastructure;
- Housing;
- Offices;
- Industry, Storage & Distribution;
- Visitor Accommodation;
- Social, Community, Leisure and Recreation;

- Main Centres;
- Local Centres;
- Agriculture and Horticulture;
- Redundant Glasshouse Sites;
- Natural Resources;
- Construction Waste;
- Built Heritage and New Development; and,
- Public and Private Parking.

The progress in delivering the 6 Plan Objectives and how the IDP policies are delivering key components of the SLUP (Linking Policies[1]) is reviewed in Section 3 of the AMR (Effectiveness of the Policies of the Island Development Plan to Deliver the Plan Objectives and the Proactive Elements of the Linking Policies of the Strategic Land Use Plan).

The monitoring requirements and actions of the thematic reports feed into the Summary of Actions to provide an overview of all the actions from the 14 thematic reports in one location.

There are abbreviations used in this AMR and a full list of abbreviations is provided at the end of the document. There are a number of documents referred to and a list of references is provided at the end of the document – the online version of the AMR has links to the documents.

The AMR also includes the responses of the States Committees to the consultation undertaken for the AMR (Appendix 1) and includes a response to the AMR from the Committee *for the* Environment & Infrastructure (Appendix 2) who has the mandate for spatial land use planning and the SLUP.

[1] The SLUP requires annual monitoring to assess how the IDP is delivering the proactive elements of SLUP's Linking Policies – these are the 13 policies in section 5 of the SLUP. These policies highlight the linkages that exist between land uses, activities and development types and identify opportunities for working in a joined-up way to better meet the overarching objectives of the States.

Island Development Plan – Plan Objectives

- Plan Objective 1: Make the most effective and efficient use of land and natural resources - To achieve and promote sustainable development through requiring development to make the most effective and efficient use of land and resources while meeting the strategic objectives of the States of Guernsey as set out within the Strategic Land Use Plan.
- Plan Objective 2: Manage the built and natural environment - To conserve and enhance the high quality of the built and natural environment while appropriately balancing the protection of important buildings or structures and open and undeveloped land with the need to ensure that an adequate amount of land can be made available for meeting legitimate development requirements, in accordance with the Strategic Land Use Plan and the Principal Aim of the Island Development Plan.
- Plan Objective 3: Support a thriving economy - To achieve and promote economic development that meets the strategic objectives of the States of Guernsey as set out within the Strategic Land Use Plan and the Principal Aim of the Island Development Plan.
- Plan Objective 4: Support a healthy and inclusive society - To achieve and promote development that supports a healthy and inclusive society where this meets the strategic objectives of the States of Guernsey, as set out within the Strategic Land Use Plan and the Principal Aim of the Island Development Plan.
- Plan Objective 5: Ensure access to housing for all - To achieve and promote a broad range of housing development that ensures an appropriate amount, mix and type of housing, including affordable housing, where this meets the strategic objectives of the States of Guernsey, as set out within the Strategic Land Use Plan.
- Plan Objective 6: Meet infrastructure requirements - To achieve the provision of infrastructure where required for the most effective and efficient functioning of the Island, in order to meet the strategic objectives of the States of Guernsey, as set out within the Strategic Land Use Plan.

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1 INTRODUCTION

The Island Development Plan

The Island Development Plan (IDP), prepared by the Development & Planning Authority (hereafter referred to as the Authority) under section 8 of the Land Planning and Development (Guernsey) Law, 2005, sets out the land planning policies for the whole of Guernsey in a single document.

The 2005 Law provides for the Strategic Land Use Plan (SLUP) to set out Strategic Land Use Objectives which guide and direct the Authority in the preparation of Development Plans and the detailed land use policies set out within them in order to achieve the States' agreed strategic economic, social and environmental objectives set out as 22 priorities in the Policy & Resources Plan (also known as the Future Guernsey Plan and referred to as such throughout the AMR). The SLUP takes a broad and long term view of land use and spatial matters providing a high level spatial planning framework, endorsed by the States, to guide the Authority in the preparation of the more detailed land use policies in the IDP. The SLUP was approved by the States in November 2011. The Planning Law requires the IDP to be prepared to be consistent with and taking into account the strategic guidance and direction set out within the SLUP.

The IDP was formally adopted by the States on 2nd November 2016. The Land Planning and Development (Plans) Ordinance, 2007 states that a Development Plan has a ten year lifespan. This can be extended by resolution of the States of Guernsey.

The IDP sets out the factors that will be taken into account by the Authority under that Plan in reaching decisions on applications for planning permission. In conjunction with the provisions under the Land Planning and Development (Guernsey) Law, 2005, the planning policies of the IDP determine how development proposals should be assessed.

The IDP deals with a wide range of land use and development issues, such as:

- How the local economy will be supported through the use of land;
- Where new homes may be built, and where industry, leisure and retail facilities may be located;
- How physical and social infrastructure will be provided to support new development;
- How Guernsey's Main Centres and Local Centres will be developed;
- How the built and natural environment will be conserved and enhanced; and,
- How householder applications for development will be assessed under the IDP.

The IDP has six main purposes:

- To manage the physical environment so as to facilitate the delivery of the States of Guernsey strategic objectives that require the use of land, as set out in the SLUP;
- To ensure that development is carried out in such a way as to appropriately balance the social, economic and environmental objectives of the States of Guernsey;
- To provide the policy framework for the determination of planning applications;
- To encourage suitable development on appropriate sites;
- To conserve and enhance the best of Guernsey's physical environment; and,
- To help to guide public and private investment in relation to land planning.

Supplementary Planning Guidance

Since the adoption of the IDP, the Authority has published Supplementary Planning Guidance as referred to in certain policies in the IDP. This provides development guidance and supplementary information in specific circumstances in relation to policy principles set out in the Plan. The guidance published to date is:

- Affordable Housing SPG 2016;
- Community Plans SPG 2016;
- Parking Standards and Traffic Impact Assessment SPG 2016;
- Change of Use of Visitor Accommodation SPG 2016; and,
- Defining Redundant Glasshouse Sites SPG 2018.

Supplementary Planning Guidance will be taken into account when considering proposals for development requiring planning permission. It is Committee level guidance and is not part of the IDP so does not have the same statutory status as the Plan. However, although they are non-statutory documents, some Supplementary Planning Guidance is given weight through the policies of the IDP which stipulate that it will be taken into account. The Supplementary Planning Guidance will be reviewed from time to time and amended, or updated, as appropriate. Further Supplementary Planning Guidance may be published if required, to address any issues identified in an Annual Monitoring Report.

Development Frameworks

Development Frameworks are non-statutory documents approved by the Authority providing an interpretation of the IDP policies and how they relate to the broad development direction for a site, or area, and give practical guidance to developers and others, as to how a specific site could be developed beneficially in terms of land use. There can be more than one Development Framework approved for a site or area, and they can be beneficial as catalysts for bringing positive development forward, especially in identified Regeneration Areas. Although they are non-statutory documents, Development Frameworks are given weight through the policies of the IDP which requires Development Frameworks to be produced in certain circumstances. A number of Development Frameworks were published in 2018. These all related to residential development and are set out in the Housing thematic report.

Local Planning Briefs and Subject Plans

Local Planning Briefs and Subject Plans are statutory plans for a particular area or site and may include policies and proposals for development which are outside of those set out in the IDP. Under the Land Planning and Development (Guernsey) Law, 2005, the procedure for adoption of a Local Planning Brief, or Subject Plan, is very similar to that for the main IDP, requiring a public inquiry and adoption by the States before coming into effect. No Local Planning Briefs, or Subject Plans, have been produced to date. A Local Planning Brief may be required for the Seafront Enhancement Area, a project that commenced in 2017. Information on this is included in the Strategic Development and Infrastructure thematic report.

Community Plans

The SLUP requires the IDP to set out clearly the specific role of Community Plans in informing planning decisions. Community Plans provide an opportunity for members of the

public to set out a vision for improvements and change to a particular locality, whether this covers a small collection of homes or a wider settlement area. It is envisaged that Community Plans will generally be produced by the community for areas within the identified Local Centres, where an element of new development is envisaged by the IDP, or produced for other areas of the Island where a community has come together to identify, within the constraints of the IDP and any other relevant statutory plan, how an area might be shaped in the future.

There have been no Community Plans completed to date but some interest has been expressed. In February 2019 the Authority released a media statement to encourage communities to progress work on Community Plans. The Authority's president, Deputy John Gollop, said the Authority was keen to get people involved. He said "these plans represent a great opportunity for local involvement in the planning and improvement of an area. It is really important, though, that the ideas for this come forward from the community involved and, while government can help support the development of a plan, it is vital that the vision belongs to the community and has its support and commitment".

Environmental Impact Assessment

The Land Planning and Development (Environmental Impact Assessment) Ordinance, 2007, requires the assessment of those draft Plan policies that could give rise to development that, itself, requires Environmental Impact Assessment (EIA). An Environmental Statement was published alongside the draft IDP to set out the findings of the EIA process for the IDP. This was Guernsey's first EIA of a Development Plan. The States was required, under section 4 of the 2007 Ordinance, to take into account the Environmental Statement before passing its resolution to adopt the IDP. Any change to the IDP would require an associated review of the EIA.

Monitoring and review of the Island Development Plan

The SLUP places a statutory requirement on the Authority in relation to monitoring the performance of a number of different elements of the IDP. There is also a legal duty on the Authority under section 8 of the Land Planning and Development (Guernsey) Law, 2005 to ensure the IDP is kept under review and to make alterations where necessary.

Ensuring that the IDP is effective and relevant requires on-going monitoring of the success and progress of its policies, to make sure it is achieving its objectives and the objectives of the SLUP and is able to support the delivery of the States priorities as set out in the Future Guernsey Plan, and to make necessary adjustments if the monitoring process reveals that changes are needed. This enables the IDP to maintain sufficient flexibility to adapt to changing circumstances and remain robust, effective and relevant. It is important to note that this AMR provides analysis of the effectiveness and relevance of IDP policies in delivering the approved strategic land use objectives of the States, and is not an analysis of the appropriateness of that approach to strategic land use planning.

Effective monitoring is managed through the Authority submitting regular reports to the Committee *for the* Environment & Infrastructure (whose mandate includes spatial planning), as required by the SLUP, setting out how the IDP is satisfying specific economic, social and

environmental objectives of the States. The monitoring reports will be published by the Authority on the States' website.

The Quarterly and Annual Monitoring Reports

Quarterly monitoring reports are factual reports providing an update on the delivery of housing and employment uses. The four quarterly reports for 2018 have been published and are available on the States' website.

The Annual Monitoring Reports (AMR) are more comprehensive reports that contain both quantitative and qualitative information, analysing the effectiveness and relevance of IDP policies, including feedback from stakeholders and relevant Committees and set out actions, if any, that need to be taken. The AMRs provide an information basis to inform potential policy changes through a statutory review of the IDP.

The objectives for the monitoring reports are to:

- Assess the implementation of the SLUP policies through the IDP policies and the management of development;
- Identify and remove any blockages to the delivery of sustainable development for which provision is made within the SLUP; and,
- Identify potential revisions required to the SLUP or IDP to ensure the objectives of the States are adequately satisfied by the land use planning system.

Review of the Island Development Plan

The IDP has a 10 year lifespan with a requirement, as set out in the SLUP, to review the supply of housing land before the end of 5 years. The Planning Law also makes provision for the IDP to be amended at any point during its life if there is robust evidence to support why this should occur. Should any changes to the IDP, including the Proposals Map, be proposed an independent Planning Inquiry would be required prior to consideration by the States of Deliberation, in accordance with the requirements of section 7 of the Land Planning and Development (Plans) Ordinance, 2007. This process does not apply to changes to any Supplementary Planning Guidance.

Five Year Review of the Island Development Plan

In accordance with the requirements of the SLUP the IDP identifies a minimum five year land supply for housing. The SLUP also requires the provision of a comprehensive range of land opportunities for employment uses. Therefore, although there is regular monitoring, there will be a review of housing land supply and employment land supply before the end of five years following the date of formal adoption of the IDP by the States of Guernsey, unless monitoring indicates a more urgent need to review the land supply sooner. The five year review will include comprehensive reviews of key aspects of the evidence base. The five year review will assess the appropriate level of provision of land for housing and employment development for the remainder of the IDP period and will include the comprehensive review of the Strategic Housing Land Availability Assessment and the Employment Land Study. Technical work in support of a potential review of elements of the Plan can incorporate other issues informed by monitoring and as the Authority deem appropriate.

Inspectors' comments and recommendations regarding monitoring and review of the Island Development Plan

In January 2015, in accordance with the requirements of section 7 of the Land Planning and Development (Plans) Ordinance, 2007, the former Policy Council appointed Mr Keith Holland and Mr Alan Boyland as the independent Planning Inspectors to carry out a public Planning Inquiry into the draft IDP. The Inspectors' report of the Inquiry with subsequent recommendations was submitted to the former Environment Department on 4th March 2016. The Inspectors made a number of comments and recommendations with regard to monitoring the implementation of the IDP and the possible need for a review of the Plan.

Spatial Strategy and housing development

The Inspectors noted the importance of monitoring the split between housing development in the Main Centres and Main Centre Outer Areas and elsewhere. An indicative 80/20 split was discussed at the Inquiry Hearings – as an assumed allowance in analysing housing land supply, not as a target or limit. They commented that in the event of actual trends failing to accord with the strategy of concentration in and around the Main Centres, it may be necessary to bring forward amendments to the IDP to address this. The housing report in the AMR analyses the split between development of housing allocations and windfall[1] development in Main Centres/Main Centres Outer Areas, and windfall development in Local Centres and Outside of the Centres.

Effectiveness of Affordable Housing policy

The Inspectors noted concern raised by some in the property development industry that the Affordable Housing policy, which is intended to be flexible, would not operate efficiently. The AMRs will reflect on Affordable Housing negotiations, viability assessments and issues affecting the delivery of housing development and will include analysis of Affordable Housing approved relative to the targets of Policy GP11. In 2018, as in 2017, Policy GP11 did not apply to any site given permission in the year.

Housing indicator

The Inspectors noted that any change to the housing indicator may require consequential amendments to the IDP. This indicator was revised in 2018, the implications of the change are assessed in the Housing thematic report.

Visitor Accommodation – change of use to alternative uses

The Inspectors recommend that trends in visitor numbers and accommodation occupancy are monitored to assess the continued appropriateness of the visitor accommodation policies in the IDP, which seek to resist loss of accommodation from the current stock other than in exceptional circumstances or in the case of smaller establishments. Both trends were in decline at the time of the Inquiry Hearings. Given the uncertainty about future demand, and the problems arising from a mismatch between supply and demand, the Inspectors considered that keeping that matter under review to be very important.

[1] Windfall Sites are undesignated sites that come forward for development during the Island Development Plan period which are not specifically identified in the Island Development Plan for that purpose, but for which policies exist to support its provision.

Related to this is IDP Resolution 5 (Billet d' État No. XXVII) which requires the Committee *for* Economic Development to return to the States with a Tourism Strategy including a review the Tourism Strategic Plan 2015-2025 (by October 2018) and to carry out an assessment of the current stock of visitor accommodation and the stock of visitor accommodation necessary to support the future viability and growth of the industry. The Policy Letter has been delayed by the Committee pending the outcome of a review of sea and air links infrastructure by the Policy & Resources Committee and their decision to complete a tourism action plan instead. The outcomes of the assessment and any new tourism strategy will need to be taken into account at the time they are available to consider the appropriateness of the IDP policies to continue to deliver the States objectives. The AMR analyses changes in the stock of accommodation in the meantime and includes visitor data made available by the Committee *for* Economic Development.

Designation of a Local Centre at Les Capelles

With regards to the potential for a Local Centre at Les Capelles, the Inspectors' view was that it has reasonable potential, but the uncertainty over the future of the convenience store prevented allocation at the time the IDP was drafted. They recommend the matter is kept under review and a change to the Plan could be considered if the convenience store is refurbished or a new store opens. The store has remained open and the planning permission to convert the store to residential use (2 dwellings) expired during 2017. This issue is addressed in the report on Local Centres.

Consultation and engagement in the AMR process

The Authority liaises with other relevant bodies to produce the Monitoring Reports. Effective monitoring requires input and feedback from other States' Committees and stakeholder groups in order to gather valuable qualitative input to assess the effectiveness of policies. The approach to monitoring is set out fully in section 21 of the IDP. This includes quarterly and annual monitoring reports.

To inform this AMR, consultation took place with key stakeholders. This included consultation with:

- States Committees – including the Committee *for* Economic Development; Committee *for the* Environment & Infrastructure; Committee *for* Education, Sport & Culture; Committee *for* Employment & Social Security; Committee *for* Health & Social Care; Policy & Resources Committee and the States' Trading Supervisory Board. Committees provided feedback on their experiences of the IDP together with contributing relevant data for inclusion as evidence (see Appendices 1 and 2). The Committee *for* Education, Sport & Culture requested that its response remain confidential so it is not include in Appendix 1. The information provided did however enable an early dialogue between the Committee and the Authority;
- Stakeholders including the Douzaines, utilities and interest groups;
- The 'Plan Forum' – a group of Guernsey architects and developers together with utilities organisations and States internal stakeholders that meets biannually with the Planning Service to provide updates and discussion on pertinent issues;
- Agents – all other agents who routinely submit planning applications;

- Commercial agents – a workshop was held with agents to update the Employment Land Study. This has contributed to the understanding and interpretation of the evidence relating to office, industry, storage and distribution policies;
- Within the Planning Service, a survey was circulated so that Planning Officers were able to comment on their experiences of the IDP, including what was working well and where. For example, guidance was felt to be needed to support agents and applicants in their interpretation of policy; and,
- Feedback from service users has been gained through their comments to Planning Officers and through consultation with agents.

Following the publication of the 2017 AMR in August 2018, the Authority decided to include the AMR as an appendix to the Billet d'État No. XXV in November 2018 to ensure all Members were aware of the document. A motion to debate the appendix report was carried and this allowed Members to make comment on the AMR (and planning issues generally) and for the Authority to answer queries. The States noted the appendix report. A number of issues that were raised during the debate have been addressed in this AMR including housing development, Affordable Housing, Development Frameworks, development of greenfield sites, agricultural land and redundant glasshouse sites, Regeneration Areas, Community Plans, retail in Local Centres and public transport.

Data sources

Section 21.5 of the IDP sets out in detail the Authority's approach to the collection and use of data. In brief, the sources of data for the 2018 AMR are:

- Planning applications and decisions;
- Planning appeals and decisions;
- Building Control information;
- Statistical data published by the Policy & Resources Committee;
- Surveys of the 2 Main Centres and 7 Local Centres by the Planning Service;
- An update to the Employment Land Study;
- An update to figures in the Strategic Housing Land Availability Assessment;
- Data provided by other States Committees regarding land used for farming, the stock of visitor accommodation and public parking;
- Data on floorspace for commercial uses provided by Digimap; and,
- Information from estate agents.

The Development & Planning Authority and the Planning Service

The Development & Planning Authority is the States Committee responsible for land use policy through the production of development plans and other instruments and also for determining development applications of all kinds. The Authority is supported by the Planning Service which delivers the operational functions of the Authority within the terms of an agreed and published scheme of delegation.

The policies and directions set by the Authority are delivered at operational level by the Planning Service, whose aim is to provide customers with a pleasant, safe and sustainable physical environment. The Service works to protect, enhance and facilitate the sustainable development of the physical environment of Guernsey through the preparation of

Development Plans, Subject Plans, Local Planning Briefs and through the application and review of Building Regulations and the setting of Guernsey Technical Standards in accordance with relevant legislation. This is also achieved through the control of development in the light of those documents, including through the application of special controls in relation to areas of particular sensitivity and importance.

Monitoring Policy Performance

This section of the Annual Monitoring Report (AMR) includes 14 'thematic reports'. These address a range of key policy issues:

- Strategic Development and Infrastructure;
- Housing;
- Offices;
- Industry, Storage and Distribution;
- Visitor Accommodation;
- Social, Community, Leisure and Recreation;
- Main Centres;
- Local Centres;
- Agriculture and Horticulture;
- Redundant Glasshouse Sites;
- Natural Resources;
- Construction Waste;
- Built Heritage and New Development; and,
- Public and Private Parking.

The purpose of the thematic reports is to assess the robustness, relevance and effectiveness of Island Development Plan (IDP) policies in satisfying the land use requirements of specific economic, social and environmental objectives of the States as set out in the Strategic Land Use Plan (SLUP) Linking Policies.

To do this, the thematic reports include:

- A review of the SLUP requirements for the relevant IDP policies and the overall aims of the IDP policies - this helps set out what the policies are trying to achieve and therefore what is being monitored;

- Consideration of any relevant States decisions in the year and the 22 priorities of the Future Guernsey Plan approved in 2017 to assess the implications for the IDP;

- The findings of any updates to the IDP evidence base - the detailed information in support of the IDP policies. There are updates from research into Main Centres, Local Centres and employment land;

- Consideration of the recommendations of the independent Planning Inspectors – who oversaw the Public Inquiry into the draft IDP - with regards to monitoring policies. The Inspectors reflected on the representations made during the Public Inquiry and recommended that certain issues are kept under review;

- In the case of the Housing and Employment thematic reports, information is drawn from the 4 published Quarterly Monitoring Reports for 2018;

- The outcomes from the decisions of the States of Deliberation when it approved the IDP in 2016 are noted;

- Relevant data from the States statistical publications such as Facts and Figures to provide context for any detailed research;

- Data provided to the Authority by other Committees on request. This includes information on visitor accommodation, public parking, inert waste recycling and dairy farming;

- An analysis of relevant planning applications determined in 2018, including any permissions given as a minor departure to the IDP policies and the issues considered for the most significant permissions or refusals;

- An analysis of relevant planning appeal decisions in 2018; and,

- Feedback from other States' Committees, agents, stakeholders and from within the Planning Service.

Where relevant the reports include actions. These actions cover further work for future monitoring, liaison required going forward with other Committees, the need for internal guidance and the need for external guidance in order to maintain and improve the effectiveness of IDP policies in delivering the States' aims as set out in the SLUP. The actions are summarised at the end of each thematic report.

Strategic Development and Infrastructure

Introduction

The Strategic Land Use Plan (SLUP) highlights the opportunities for mixed use re/development within the Main Centres, with the aim of promoting and enabling development that can deliver economic, social and environmental benefits to the positive advantage of the Island as a whole (Policy LP9: Main Centre Vitality and Viability - Delivery). The SLUP notes that many of the opportunities identified centre on the eastern coastal areas of the Main Centres. These are areas that accommodate land which is either inefficiently used or could be put to better alternative use through the implementation of a co-ordinated strategy.

The SLUP states that modern infrastructure is vital to the Island and the ability of the planning system to enable its timely provision is an important objective of the SLUP. SLUP Policy LP11: Infrastructure and Implementation states that the Development Plan will make provision for the development of Guernsey's infrastructure to meet the social, economic and environmental objectives of the States. Those objectives are now embodied in the 22 priorities of the Future Guernsey Plan. The Island Development Plan (IDP) has policies which support the provision of the physical structures and large physical networks needed for the functioning of a modern society. These form the Infrastructure section of the IDP alongside policies for the harbours in the Main Centres.

In some instances, strategically important development, including infrastructure may, at some stage in the future, be identified that was not envisaged at the time the IDP was prepared. Consequently, Policy S5: Development of Strategic Importance has been prepared and will override other policies of the IDP in identified and specific circumstances.

The IDP makes provision for a flexible approach to the control of development on sites where strategic opportunities exist to enable them to be fully and appropriately utilised in the future for the economic, social and environmental benefit of the Island. Policy S6: Strategic Opportunity Sites supports proposals on specific sites identified by the Authority that are, or are becoming, obsolete for their intended purpose or are underused in their current form for development that is clearly demonstrated to be capable of delivering strategic objectives of the States of Guernsey.

This report considers the effectiveness of IDP policies to deliver infrastructure projects and major developments. This includes the development of Harbour Action Areas, Regeneration Areas, Safeguarded Areas and Airport Land. The report will also analyse cases where the Development of Strategic Importance policy (Policy S5) and the Strategic Opportunity Sites policy (Policy S6), which are exceptions to the Spatial Policy, have been used.

As yet, no Local Planning Briefs have been produced since adoption of the IDP but future Annual Monitoring Reports (AMR) will assess progress with Local Planning Briefs. Progress with Development Frameworks (DFs) is addressed under the relevant topic. All DFs to date have related to residential development so this is considered in the Housing report.

2 MONITORING POLICY PERFORMANCE – STRATEGIC DEVELOPMENT AND INFRASTRUCTURE

This report will seek to highlight any policy blockages to the delivery of strategic infrastructure and development in relation to the IDP. An identified risk to the delivery of strategic development and infrastructure is delay in production of Local Planning Briefs and Development Frameworks (see IDP paragraph 21.7.3).

In future AMRs there is the potential to expand this report to address other issues such as energy, waste, land reclamation or coastal defence projects and strategies, however the emerging Long-Term Infrastructure Investment Plan will take the lead role in managing infrastructure requirements going forward, and will need to monitor progress. The AMR will focus on the interaction between the infrastructure required and its delivery through the IDP policies. Together these two projects will deliver the SLUP requirement for monitoring of the 'delivery of infrastructure' identified as being required by the States of Guernsey.

Long-Term Infrastructure Investment Plan

There is a Long-Term Infrastructure Investment policy priority within the Future Guernsey Plan which will determine the priorities for the long-term infrastructure requirements of the States that the IDP policies will need to be able to deliver. This is one of the 22 priorities for the States that will provide a targeted Infrastructure Plan which focuses on the identification, co-ordination and prioritisation of the infrastructure required to deliver the States' identified priorities.

The relationship and impacts of the emerging infrastructure plan, the IDP policies and the SLUP will need to be considered in due course. The IDP policies provide for a variety of potential infrastructure projects through the policies of the Infrastructure section of the Plan and through Policy S5: Development of Strategic Importance and Policy S6: Strategic Opportunity Sites. The policies of the IDP do not extend to the marine environment. However, any on-shore and land-based developments would require planning permission and the policies of the IDP would apply.

The emerging Long-Term Infrastructure Investment Plan will provide information for the Authority to take into account in determining proposals for new development. The Committee *for the* Environment & Infrastructure (C*f*E&I) in its response to consultation as part of the AMR process comment that the "Long-Term Infrastructure Investment Plan is being developed and a period of engagement and consultation will take place. At this stage there are no specific areas to highlight in relation to the IDP or Strategic Land Use Plan". A Policy Letter from the Policy & Resources Committee 'Policy & Resource Plan – 2018 Review and 2019 Updates' will be debated by the States in June 2019. The Policy Letter provides a further update: "In order to progress the Plan lead officers have been identified and a joint supervisory board comprising members from the Committee *for the* Environment & Infrastructure and the Policy & Resources Committee. The group will revert to the States Assembly in Q1 2020". The Plan intends to "ensure alignment with other strategies of the States including but not exclusive to: the States' Economic Development Strategy; the Telecommunications Strategy; the Seafront Enhancement Area; the Island Development Plan; and the Partnership of Purpose".

Harbour Action Areas

The Harbour Action Areas (HAAs) have potential for significant development. The HAAs embrace extensive areas within and around the St Peter Port and St Sampson harbours recognising that in addition to vital operational activities that take place within the ports there are areas with significant potential to be developed and used to meet the economic, social and environmental objectives of the States.

IDP Policy MC10: Harbour Action Areas notes that detailed strategies for the development of the St Peter Port HAA and the St Sampson's HAA will be provided in a Local Planning Brief for each area when approved by the States of Guernsey. In the meantime the policy supports proposals where they are of a minor or inconsequential nature or do not prejudice the outcomes of the Local Planning Brief process.

Policy IP3: Main Centre Port Development supports development that is essential to the effective, efficient and safe operation of the ports, providing that the development would not prejudice the outcomes of the Local Planning Brief process and would not inhibit the implementation of an approved Local Planning Brief.

The planning applications in the Harbour Action Areas in 2018 are reviewed in the Main Centres thematic report. Given the policy context of the IDP, none of these permissions were for development of any significant scale. All of these were assessed for the potential impact on the delivery of the comprehensive master-planning and redevelopment of the harbours. Policies MC10 and IP3 are providing the flexibility to approve developments in the HAAs that would not prejudice the outcomes of local development strategies for these areas which is supported by the 51 planning permissions granted against 0 refusals in these areas in 2018.

<u>Seafront Enhancement Area</u>

The States has identified through the Future Guernsey Plan the eastern seafront including the HAAs as one of the 22 key priorities to focus on. Political governance has been set up which includes representation by the Authority, the Committee *for the* Environment & Infrastructure, the Committee *for* Economic Development, the States Trading and Supervisory Board and the Policy & Resources Committee. The group has named the project the Seafront Enhancement Area (SEA). Public consultation is forming a significant part of the programme and public and formal consultation will be carried out throughout the development of strategy and plans for the overall area and / or component parts of it.

An update (as at January 2019) has been provided by the Policy & Resources Committee (P&RC) and is available in Appendix 1. In summary: The Seafront Enhancement Area programme is the development and co-ordination of policies for the enhancement of the east coast of Guernsey including St Peter Port and St Sampson's Harbour Action Areas. A political Steering Group has been formed to co-ordinate the SEA programme. Owing to recognised advantages in bringing forward some enhancements as quickly as possible, and acknowledging that the programme is complex and extensive and likely to take some time to fully deliver, the Steering Group decided to split the overall SEA programme into two work streams:

1. The development of a long-term plan for the east coast; and

2. The identification of shorter-term initial enhancement projects.

1. Long-term Plan

The Steering Group has agreed a number of Enhancement Principles and Objectives. Using the Enhancement Principles and Objectives, the Steering Group has scheduled a stakeholder workshop, with the aim of identifying the challenges and problems that need to be addressed and fixed and the opportunities for enhancement that will meet the aims of the SEA programme. Following identification of these, the Steering Group will undertake an evidence gathering process to ascertain the extent and viability of each element, before undertaking an engagement process to determine the public's opinion of these. This will culminate in the production of a high-level SEA plan and business case.

Since this summary was provided by P&RC, the Steering Group has confirmed that a high-level Seafront Enhancement Area Plan, which will set out which specific developments should come forward as part of the SEA programme, will be presented to the States alongside a local development strategy for the St Peter Port HAA. A Policy Letter from the Policy & Resources Committee 'Policy & Resource Plan – 2018 Review and 2019 Updates' will be debated by the States in June 2019. The Policy Letter provides a further update: "The SEA Steering Group has set a target for presenting the high level Seafront Enhancement Area Plan to the States before May 2020, and will work closely with the Development & Planning Authority, which is the body responsible for producing the relevant plans and briefs" and "at this stage, the SEA Steering Group envisages that the delivery of this plan will be split into several projects. Consideration will be given to the most appropriate delivery mechanism/vehicle and once approved by the States, formal tenders will be invited from industry for the delivery of each element". The potential delivery mechanism to create planning policies could be a Local Planning Brief, Subject Plan or amendment to the IDP.

2. Initial Enhancements

The Steering Group has identified six States-owned sites along the St Peter Port seafront, which have the potential to be enhanced without adversely impacting the ability to deliver the long-term plan for the east coast. Following a public engagement programme shortlisting will take place for a further round of assessment based on developed, detailed business cases. It is the intention of the Steering Group that at least one of the six sites should see some form of physical enhancement before October 2019.

In response to the consultation as part of the AMR process, the States Trading and Supervisory Board (STSB) notes that "the STSB and Ports management looks to seek a return from the Ports' property estate that is in the best interests of islanders. The STSB and the Ports seek to achieve the best value in managing its assets, realising the potential that may be created by the Harbour Action Area (HAA). Ports management would like to take every opportunity to more fully utilise the Ports Assets, whilst it is cognisant of the need to pause for the States to take a wider strategic view of the whole area and its greater impact and potential for regeneration and re-development, pending the development of the Harbour Action Area. STSB is firmly of the view that the HAA should provide a significant opportunity for the States, the local economy, St Peter Port and the Harbour, however the timing, resources and process required to deliver that blueprint, has to be managed against the present need to increase revenue generation for the Ports (and the States)". As stated

above, the IDP does support proposals in advance of a plan for the HAA where they would not prejudice the outcome of the plan process.

The P&RC notes in its response to consultation as part of the AMR process that "thought is being given to how the SEA programme will be delivered through established planning mechanisms, such as those that exist for the Harbour Action Areas. Therefore, the Steering Group will work closely with the Development & Planning Authority on the development of a draft Local Planning Brief, if this is regarded as the most appropriate mechanism, and at this stage it is envisaged that this will be developed in parallel with the production of the high-level SEA plan and business case".

The States resolved, in May 2019, after consideration of the amended propositions of the Requête titled "St. Peter Port Harbour Development", to direct the Authority to consult relevant Committees and other stakeholders and prepare proposals for a local development strategy for the St Peter Port Harbour Action Area and to direct the Authority and the C*f*E&I to take all necessary steps under the Land Planning legislation to lay such proposals before the States for adoption by the end of 2020. The completion of workstreams relating to a number of other related States resolutions however, will be required prior to completion of a local development strategy for the St Peter Port Harbour Action Area and this will impact on the delivery date. The P&RC were also directed to investigate options for the resourcing, management and delivery of the Seafront Enhancement Area programme, including the delivery mechanism for development, and to report back to the States with recommendations in relation to such options by the end of 2020.

The AMR will monitor progress with the Local Planning Brief for the wider SEA area to ensure that land use policies do not present blockages. Once adopted, monitoring of the implementation of the projects will take place separately to the AMRs.

INDICATOR – Delivery of the Local Planning Brief (or other appropriate mechanism) for the Seafront Enhancement Area		
Plan Objective		Plan Objective 1: Make the most effective and efficient use of land and natural resources. Plan Objective 2: Manage the built and natural environment. Plan Objective 3: Support a thriving economy. Plan Objective 4: Support a healthy and inclusive society. Plan Objective 6: Meet infrastructure requirements.
Target		Complete Local Planning Brief (or other appropriate mechanism) for the Seafront Enhancement Area.
Outcome	2018	Work has not started on production of the Local Planning Brief (or other appropriate mechanism).
	2017	Work has not yet started on the Local Planning Brief.
Target met?		No.
Comments (including any risks to delivery)		A Local Planning Brief(s) (or other appropriate mechanism(s)) is required prior to comprehensive development proposals being considered in the harbours or for Development of Strategic Importance within the

	Seafront Enhancement Area. IDP policies have been shown to allow for development that would not prejudice the outcomes of the Local Planning Brief/s Local Planning Brief (or other appropriate mechanisms) to proceed in the meantime.
Action	The Authority to work closely with, and be an intrinsic part of, the SEA group to help deliver the Local Planning Brief(s) (or other appropriate mechanisms) for the Seafront Enhancement Area.

INDICATOR – Delivery of the Local Planning Brief (or other appropriate mechanism) for the St Peter Port Harbour Action Area		
Plan Objective		Plan Objective 1: Make the most effective and efficient use of land and natural resources. Plan Objective 2: Manage the built and natural environment. Plan Objective 3: Support a thriving economy. Plan Objective 4: Support a healthy and inclusive society. Plan Objective 6: Meet infrastructure requirements.
Target		Complete Local Planning Brief (or other appropriate mechanism) for the St Peter Port Harbour Action Area.
Outcome	2018	Work has not started on production of the Local Planning Brief (or other appropriate mechanism).
	2017	Work has not yet started on the Local Planning Brief.
Target met?		No.
Comments (including any risks to delivery)		A Local Planning Brief(s) (or other appropriate mechanism) is required prior to comprehensive development proposals being considered in the harbours or for Development of Strategic Importance within the Seafront Enhancement Area. IDP policies have been shown to allow for development that would not prejudice the outcomes of the Local Planning Brief/s to proceed in the meantime.
Action		2017 AMR Action Update – the 2017 AMR include an action for the Authority to be an intrinsic part of the SEA group. This action is carried forward as: The Authority to work closely with, and be an intrinsic part of, the SEA group to help deliver the Local Planning Brief or other appropriate mechanism) for the St Peter Port Harbour Action Area.

INDICATOR – Delivery of the Local Planning Brief (or other appropriate mechanism) for the St Sampson's Harbour Action Area	
Plan Objective	Plan Objective 1: Make the most effective and efficient use of land and natural resources. Plan Objective 2: Manage the built and natural environment.

		Plan Objective 3: Support a thriving economy. Plan Objective 4: Support a healthy and inclusive society. Plan Objective 6: Meet infrastructure requirements.
Target		Complete Local Planning Brief (or other appropriate mechanism) for the St Sampson's Harbour Action Area.
Outcome	2018	Work has not started on production of the Local Planning Brief (or other appropriate mechanism). The focus of work to date on the SEA has been on the St Peter Port harbour.
	2017	Work has not yet started on the Local Planning Brief.
Target met?		No.
Comments (including any risks to delivery)		A Local Planning Brief(s) (or other appropriate mechanism) is required prior to comprehensive development proposals being considered in the harbours or for Development of Strategic Importance within the Seafront Enhancement Area. IDP policies have been shown to allow for development that would not prejudice the outcomes of the Local Planning Brief/s to proceed in the meantime.
Action		The Authority to work closely with, and be an intrinsic part of, the SEA group to help deliver the Local Planning Brief (or other appropriate mechanism) for the St Sampson's Harbour Action Area.

Regeneration Areas

Regeneration Areas are areas where a co-ordinated and flexible approach to planning of mixed-use development can achieve significant new sustainable place making, attracting inward investment and making improvements to and enhancement of the public realm and historic environment. The Regeneration Areas are located at South Esplanade and Mignot Plateau, Lower Pollet and Le Bordage/Mansell Street in St Peter Port and Leale's Yard at the Bridge in St Sampson / Vale.

IDP Policy MC11: Regeneration Areas requires a Development Framework for each Regeneration Area prior to their redevelopment. In the meantime the policy supports proposals where they are of a minor or inconsequential nature. A review of planning applications in 2018 within the Regeneration Areas is included in the Main Centres thematic report. Given the policy context of the IDP, none of these permissions were for development of any significant scale.

A project is ongoing to produce a Development Framework for the South Esplanade and Mignot Plateau Regeneration Area. This is being procured by the States as a major landowner within the area and following the vacation of States' offices as part of the project to rationalise the States' property portfolio. However ongoing resource issues are proving to be a barrier to production and alternative ways of funding the production of Development Frameworks for all the Regeneration Areas is being explored so as to realise their economic, social and environmental potential in a timely way.

2017 AMR Action Update – the 2017 AMR included an action to Review progress of the Leale's Yard Regeneration Area in the 2018 AMR - a part outline / part full planning permission was granted in 2016 for Leale's Yard. The outline permission lapsed in 2018 which was for the mixed-use re-development of part of the site for 303 new residential units and 1,074m^2 of commercial / retail / community space. The full permission will lapse in 2019 if works do not commence on site and is for the demolition of existing buildings on the Bridge/derelict buildings within the site; and the development of two buildings together comprising 109 new residential units and 1,049m^2 of ground floor commercial/retail space and road improvements in the area. A project to produce a Development Framework for this Regeneration Area will be commenced by the Authority in 2019, should the full planning permission lapse in 2019, to be produced in co-operation with the major landowner and other relevant Committees subject to the resource / funding options described above.

The P&RC in its response to consultation as part of the AMR process comment that "whilst some development has taken place in some of the identified areas, it is clear that in others progress towards redevelopment has been slow. P&RC requests that the DPA includes in its report an assessment of how effective the policy has been at encouraging redevelopment in these areas and what, if any, barriers may be hindering the progress".

Through identifying the Regeneration Areas the IDP raises awareness of the potential for positive enhancements to the Main Centres through redevelopment. For such development to be successful a co-ordinated and comprehensive approach is needed. The starting point for this is the production of a Development Framework which can also bring landowners and developers together and allow the public to input their views to the process. Initial work on a Framework for the South Esplanade and Mignot Plateau area has begun and a Framework for Leale's Yard will be commenced as set out above.

In all cases willing landowners are required and an economic context that supports the viability of development. In the case of South Esplanade and Mignot Plateau the States has a stake as a landowner. Lower Pollet and Le Bordage/Mansell Street Regeneration Areas are complex with multiple land owners and no firm proposals have been made to date. However, the Authority is exploring potential funding opportunities to bring forward these Development Frameworks.

Regeneration Areas are considered an effective mechanism to raise awareness of the potential for investment and development. The Development Frameworks will act as planning guidance but also as a promotional tool for the States. The Frameworks will set out the potential of the areas including opportunities for significant new sustainable place making, improvements to and enhancement of the public realm and historic environment, all of which will sustain the vitality of the Main Centres and ensure that they remain attractive places in which to live, shop, work and spend leisure time. The policies of the IDP are applied flexibly in Regeneration Areas, allowing for a broad range of potential uses and taking a pragmatic approach to balancing the economic and social value of development with environmental considerations including the conservation of buildings. Policies support development of a minor or inconsequential nature in advance of Development Frameworks while restricting development which could prejudice their future economic potential.

The progress with the drafting of Development Frameworks for the Regeneration Areas will be kept under review.

INDICATOR – Delivery of Development Frameworks for the Regeneration Areas at South Esplanade and Mignot Plateau, Lower Pollet and Le Bordage/Mansell Street		
Plan Objective		Plan Objective 1: Make the most effective and efficient use of land and natural resources. Plan Objective 2: Manage the built and natural environment. Plan Objective 3: Support a thriving economy. Plan Objective 4: Support a healthy and inclusive society. Plan Objective 5: Ensure access to housing for all.
Target		Complete Development Frameworks for these Regeneration Areas.
Outcome	2018	Ongoing work on the Development Framework for South Esplanade and Mignot Plateau Regeneration Area.
	2017	Inception of work for South Esplanade and Mignot Plateau Regeneration Area.
Target met?		No.
Comments (including any risks to delivery)		The policy is ensuring that no development is being permitted that would undermine the potential for the comprehensive development of the areas whilst allowing for small scale or inconsequential development to progress. There has however been no progress with 2 of the 3 areas.
Action		2017 AMR Action Update – the 2017 AMR included an action for the Authority to investigate options to progress discussions leading to Development Frameworks for a number of Regeneration Areas. This action is carried forward as: The Authority to investigate options to progress Development Frameworks for Lower Pollet and Le Bordage/Mansell Street Regeneration Areas and complete work on the Development Framework for South Esplanade and Mignot Plateau, and review progress in future monitoring.

INDICATOR – Delivery of a Development Framework for Leale's Yard Regeneration Area	
Plan Objective	Plan Objective 1: Make the most effective and efficient use of land and natural resources. Plan Objective 2: Manage the built and natural environment. Plan Objective 3: Support a thriving economy. Plan Objective 4: Support a healthy and inclusive society. Plan Objective 5: Ensure access to housing for all.

		Plan Objective 6: Meet infrastructure requirements.
Target		Complete a Development Framework for the Regeneration Area if required, potentially for a range or uses including mixed use.
Outcome	2018	A project to produce a Development Framework for the Regeneration Area will commence in 2019.
	2017	n/a
Target met?		No
Comments (including any risks to delivery)		The policy is ensuring that no development is being permitted that would undermine the potential for the comprehensive development of the area whilst allowing for small scale or inconsequential development to progress.
Action		Should the full planning permission for Leale's Yard lapse in 2019, the Authority to commence a Development Framework for the Leale's Yard Regeneration Area and review progress in future monitoring.

Safeguarded Areas

IDP Policy IP5: Safeguarded Areas states that Safeguarded Areas shall be protected from any development that may compromise their future implementation for strategically important development. Three areas are designated on the Proposals Map as Safeguarded Areas:

- Chouet Headland for possible mineral extraction;
- Les Vardes Quarry for possible water storage; and,
- Land to the east of airport land for a possible runway extension.

The only permission in 2018 in a Safeguarded Area was to install an interpretation board in Chouet car park.

Policy IP5 requires a Development Framework to be in place prior to development within a Safeguarded Area. Work began in 2017 on preparing a Development Framework for the Chouet Headland in relation to possible mineral extraction and a draft was published for consultation in April 2019. There has been no requirement to progress Development Frameworks for the other Safeguarded Areas.

The use of land to the east of airport land for a runway extension would be brought forward if required by the States for this purpose and IDP policies are in place to support this as and when required.

With regards to the use of Les Vardes for water storage, in its response to the consultation for the AMR, STSB comment that the continued safeguarding of Les Vardes remains appropriate. Its states that "this allocation secures a future option to develop longer-term resilience to more severe drought than Guernsey has historically experienced, which is prudent given uncertainty over how severe climate change will be in the future". STSB also comment however that "Les Vardes Quarry has been discounted as a short term option for inert waste, following receipt of further information on the operational life of its quarry

business. However, it still remains a potential long term option for inert waste, if it is demonstrated that this use would be of greater long term value to islanders than the current allocation for water storage".

The continued need for these sites to be safeguarded will be kept under review as will progress with the projects to use the land in relation to IDP Policies. If the sites are not needed for the identified safeguarded use other uses could be considered, if appropriate.

There is no current indication that the Safeguarded Areas should not continue to be designated as such. Policy IP5 has not yet been pertinent to the determination of a planning application.

Airport Land

IDP Policy IP4: Airport Related Development supports proposals relating to the operation or safety of the airport where they would ensure the continued effective, efficient and safe operation of the airport. The policy also supports proposals for development associated with airport related uses on airport land, immediately adjoining airport land or within close proximity to airport land subject to a range of criteria.

The airport is designated in the IDP as 'Airport Land' on the Proposals Map. The area identifies the operational area of the airport. The IDP makes provision for airport related development to ensure the airport remains fit for purpose for the foreseeable future and is able to respond to opportunities to strengthen its contribution to the economy. There were 2 planning permissions at the airport in 2018. These were to: relocate floodlighting in the car park; and, install a replacement roof on a hanger. These permissions demonstrate that the IDP Policy IP4 is performing as intended and supports appropriate development at the airport.

It is a Future Guernsey Plan priority to improve the Island's air and sea links. The Plan states that "this priority will provide support to the maintenance and investigation of options for the expansion of air and sea links so that Guernsey is well connected with the UK and mainland Europe. It is essential that the Island has robust, sustainable, reliable and affordable air and sea links in order to deliver a dynamic and growing economy. This incorporates business travel to and from the Island, visitor and local travel to and from the Island, and the import/export of freight". There is no policy impediment for the principle of development to support these aims. To date no policy decisions have been made that have a land-use implication for the airport.

Development of Strategic Importance and Strategic Opportunity Sites

IDP Policy S5: Development of Strategic Importance allows for proposals which may conflict with the Spatial Policy or other IDP policies but which are clearly demonstrated to be in the interest of the health, or well-being, or safety, or security of the community, or otherwise in the public interest provided there is no more suitable site.

In 2018 an application was submitted for the change of use of the Royal Bank of Canada offices in Upland Road, St Peter Port, for an extension to the Elizabeth College campus. The proposal will result in the loss of office floor space which is not acceptable under Policy

MC4(A). Policy S5 allows other IDP policies to be overridden, but only in exceptional circumstances. The unique circumstances of the application meant that the proposal was considered Development of Strategic Importance - the proposal seeks to resolve issues to do with the adequacy of the Island's education provision are was therefore considered as addressing issues concerning the health and well-being of the community, and no more suitable sites were considered to be available. The application was approved in 2019 using Policy S5. This was the first test of the policy, and only use of the policy to date, and positively shows that the principle works.

IDP Policy S6: Strategic Opportunity Sites supports proposals for development that are clearly demonstrated to be capable of delivering strategic objectives of the States of Guernsey on sites that are, or are becoming, obsolete for their intended purpose or are underused in their current form, subject to a range of criteria including production of a Local Planning Brief. There were no planning applications determined in 2018 that related to this policy. As and when sites come forward the Authority will have to consider how to resource Local Planning Briefs and potentially Development Frameworks associated with development under policies S5 and S6.

Summary

In conclusion, policies are in place which allow for specific strategic and infrastructure development to take place now and safeguard areas for strategically important development (the Infrastructure section of the IDP), and allow for potential developments in the future which have yet to be identified (policies S5 and S6, which could be important for implementation of the Long-Term Infrastructure Investment Plan). IDP policies also allow for minor and inconsequential development to progress as indicated by planning permissions granted in 2018. Therefore no blockages by IDP policies have been identified to delivery of essential strategic and infrastructure development. IDP policies have been shown to give positive and flexible support to delivery and fulfil the aims of the SLUP.

Summary of monitoring requirements

- Review progress of the Leale's Yard Regeneration Area in future monitoring; and,
- Review progress with the Lower Pollet, Le Bordage/Mansell Street and South Esplanade and Mignot Plateau Regeneration Areas in future monitoring.

Summary of action required

- The Authority to work closely with, and be an intrinsic part of, the SEA group to help deliver the Local Planning Brief(s) (or other appropriate mechanism(s)) for the Seafront Enhancement Area;
- The Authority to work closely with, and be an intrinsic part of, the SEA group to help deliver the Local Planning Brief (or other appropriate mechanism) for the St Peter Port Harbour Action Area;
- The Authority to work closely with, and be an intrinsic part of, the SEA group to help deliver the Local Planning Brief (or other appropriate mechanism) for the St Sampson's Harbour Action Area;
- The Authority to investigate options to progress Development Frameworks for Lower Pollet and Le Bordage/Mansell Street Regeneration Areas and complete work on the Development Framework for South Esplanade and Mignot Plateau; and,

- Should the full planning permission for Leale's Yard lapse in 2019, the Authority to commence a Development Framework for the Leale's Yard Regeneration Area.

Housing

Introduction

The Strategic Land Use Plan (SLUP) has a core objective requiring 'levels of housing availability, quality and affordability to be improved, enabling people to help themselves become independent where possible'.

SLUP Policy SLP12 requires the IDP to ensure that provision is effectively made to meet the annual requirement for the creation of new homes of an appropriate mix of tenures, housing sizes and types, to meet the Island's housing needs. Policy SLP13 requires the IDP to ensure that a minimum 5 year land supply is effectively made to meet the annual requirement for new homes. Before the end of this 5 year period, the SLUP requires review of the IDP in terms of housing land supply in order to assess the appropriate scale of provision of land for housing that is required for the remaining duration of the Plan. Housing policy, including the supply of housing land and the provision of housing of appropriate type, size and tenure is identified as one of the 22 priorities of the States in the Future Guernsey Plan.

The IDP has a Plan Objective to 'ensure access to housing for all' and generally supports the development of new dwellings in the Main Centres, Main Centre Outer Areas and Local Centres. New dwellings are also supported Outside of the Centres, in certain circumstances, through sub-division of existing dwellings or through conversion of redundant buildings.

Consistent with the SLUP, the IDP ensures that there is a minimum 5 year land supply to meet the annual requirement for new homes to meet the Island's housing needs. This is achieved with the allocation of 15 sites in the IDP specifically for housing development, all within either a Main Centre or Main Centre Outer Area which, combined with an allowance for windfall[1] development on other sites and existing permissions, make up the five year land supply requirement. Additionally the SLUP requires the Authority to demonstrate, through regular monitoring, that there is a maintained minimum 2-year supply of housing permissions within the 'pipeline' that is able to come forward for development.

The annual requirement for new homes is based on the States' Strategic Housing Indicator. When the IDP was adopted in November 2016, this indicator (then referred to as a 'target') was set at making effective provision for 300 new dwellings each year; the target having been in place since 2002. The IDP acknowledges that the indicator will be subject to review by the States from time to time. The SLUP clarifies that in considering the strategic target at that time it was important to understand that the States cannot force developers to construct housing units and that the figure of 300 units related therefore to the number with planning permission and not to the number of units actually constructed per year. In accordance with the SLUP the IDP therefore makes effective provision for the annual housing requirement (a minimum of 1,500 planning permissions for homes for the first five

[1] Windfall Sites are undesignated sites that come forward for development during the Island Development Plan period which are not specifically identified in the Island Development Plan for that purpose, but for which policies exist to support its provision.

years of the Plan at the time the IDP was adopted) through putting in place designations and policies which allow the required number of planning permissions to be granted.

In July 2018, the States resolved to agree the States' Strategic Housing Indicator be set at completing 635 new units of accommodation between 2017 and 2021, with a plus or minus variance of 149 new units to give the flexibility to react to market changes. This equates to an annual average of 127 additional units of accommodation with a plus or minus variance of 30 new units of accommodation. It also agreed to separate the States' Strategic Housing Indicator into an Affordable Housing Indicator set at completing 178 units of Affordable Housing over the next 5 years with a plus or minus variance of 32 new units to give the flexibility to react to demand and market changes and a private market housing indicator of 457 new units of accommodation with a plus or minus variance of 117 new units of accommodation for the same period. This represented a shift in the strategic annual housing requirement indicator from numbers of planning permissions for new residential units to numbers of new residential units completed and built. This did not change the requirement for the IDP to put in place policies for the effective provision of the annual housing requirement through planning permissions granted.

The AMR does include analysis of the completion of new homes in relation to the most recent Strategic Housing Indicator – see Figure 16 below. In addition, in accordance with the SLUP (Policy SLP13), the Authority is required to demonstrate through regular monitoring that there is a maintained minimum 2-year supply of housing permissions within the 'pipeline' that are able to come forward for development at any one time (known as the pipeline supply) so that effective provision is made to meet the requirements of the strategic indicator. This monitoring is included in the Quarterly Monitoring Reports and the pipeline supply at the end of 2018 is shown in Figure 1 below.

Whilst the calculation of the 2 year pipeline supply is based on the Strategic Housing Indicator, which now relates to the completion of dwellings, it is used for planning purposes to provide a test to ensure there is sufficient land available and planning permissions for housing in place to meet recognised housing needs. This monitoring, alongside other research, enables the Authority to determine whether the IDP housing policies are meeting the objectives of the SLUP and whether there is a need to amend planning policies or to seek additional land for housing.

Given the current annual indicator for the completion of 97-157 additional new dwellings per year, the pipeline supply requirement equates to planning permissions for at least 194-314 new dwellings (136-230 private market, 58-84 Affordable Housing). As previously noted, although the IDP is fulfilling the requirements of the SLUP by putting in place policies which allow for the effective provision of dwellings to meet the indicator requirement, planning permissions do not necessarily result in the housing being built so this does not necessarily mean that the States Indicator is being met. The rate of completion of housing depends on a range of other factors such as the economy and construction industry capacity and falls outside of the control of the IDP policies. The SLUP recognises that ensuring that appropriate housing development is actually built will involve cross-committee working and the adoption of a proactive attitude towards housing development.

2 MONITORING POLICY PERFORMANCE - HOUSING

The Committee *for the* Environment & Infrastructure (C*f*E&I) Policy Letter 'Local Market Housing Review and Development of Future Housing Strategy' was debated in July 2018 and a 'Programme of Works' was endorsed that will help inform the development of a revised Housing Strategy for Guernsey. One workstream recognises the importance of the regular collection and publication of relevant and reliable data for the analysis of future housing requirements. This is to be achieved via the research and establishment of an appropriate housing data collection model, data collection processes and monitoring and review of future housing indicators and recommends joint working between the C*f*E&I, the Authority and the Committee *for* Employment & Social Security (C*f*E&SS) to achieve this. Accurate, robust and real-time data will be essential in order to be able to ensure that new housing is reflective of the demographic profile of households requiring housing at any one time in accordance with the housing policies of the IDP. The effectiveness of IDP housing policies to ensure the mix and type of units being built are what the Island requires is therefore dependent upon the successful implementation of the workstream identified by the C*f*E&I.

In its response to consultation as part of the 2018 AMR process, the C*f*E&I comment that "areas of work that feed into this 'Programme of Works' continue to progress independently but, due to the funding for a dedicated staff resource to manage this programme of work only just now being confirmed, progress on pulling these work streams together and making significant development has not occurred as expeditiously as the Committee had hoped. Now that funding has been made available for this staff resource, recruiting will take place imminently and these work streams should now progress".

2017 AMR Action Update – the 2017 AMR included an action for joint working between the Development & Planning Authority, the Committee *for* Employment & Social Security (whose mandate includes delivery of Affordable Housing), the Committee *for the* Environment & Infrastructure and the Policy & Resources Committee in order to implement the 'Programme of Works' endorsed by the States following the debate of the Policy Letter 'Local Market Housing Review and Development of Future Housing Strategy' in July 2018, particularly in relation to the monitoring of housing supply and need and the establishment of an appropriate data collection model and data collection processes. This action is carried forward.

'Pipeline' Housing Supply

New housing is deemed to be effectively in the 'pipeline' where planning permission has been granted and the development is not yet complete, and where the development of new housing is acceptable in principle (outline planning permission). Figure 1 below demonstrates the number of dwellings in the 'pipeline' at the end of 2018. The pipeline at the end of 2017 was 1177 dwellings. The reduction is largely as a result of the outline planning permission for 303 dwellings at Leale's Yard, The Bridge, lapsing during quarter 3.

	Number of dwellings			
Source of Supply – Private Market	Main Centres	Local Centres	Outside of the Centres	Total
Full permissions (work not commenced)	249	59	93	401
Outline permissions	16	0	0	16
Under Construction	213	2	40	255
Total	**478**	**61**	**133**	**672**
Source of Supply – Affordable Housing				
Full permissions (work not commenced)	6	0	33	39
Outline permissions	0	0	0	0
Under Construction	36	0	20	56
Total	**42**	**0**	**53**	**95**
Pipeline Supply		**767**		

Figure 1: Pipeline Housing Supply

Pipeline Housing Supply – detailed 'Centres' analysis:

	Number of dwellings			Total
Location	**Full permissions (work not commenced)**	**Outline permissions**	**Under Construction**	
St Peter Port MC	60	-	62	122
St Peter Port MCOA	51	16	99	166
St Sampson / Vale MC	112	-	8	120
St Sampson / Vale MCOA	32	-	80	112
Total MCs	255	16	249	**520**
Cobo Local Centre	16	-	-	16
Forest Local Centre	-	-	-	-
Forest West Local Centre	-	-	-	-
L'Aumone Local Centre	1	-	-	1
L'Islet Local Centre	3	-	-	3
St Martin's Local Centre	40	-	2	42
St Peter's Local Centre	-1	-	-	-1
Total LCs	59	-	2	**61**
Outside of the Centres	126	-	60	**186**
Total	**440**	**16**	**311**	**767**

Figure 2: Pipeline Supply by Centre

MC - Main Centre. MCOA – Main Centre Outer Area

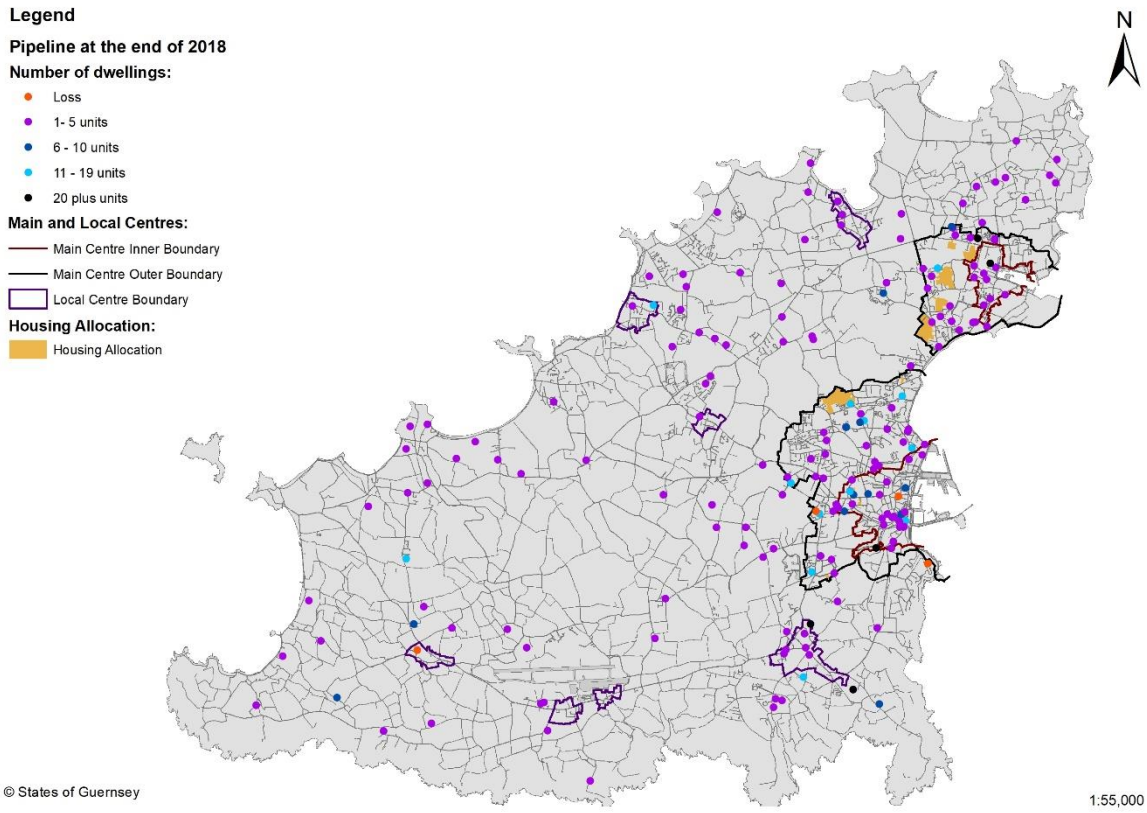

Figure 3: Pipeline Housing Supply at the end of 2018

INDICATOR – Pipeline housing supply		
Plan Objective		Plan Objective 5: Ensure access to housing for all.
Target		A minimum 2-year supply of planning permissions for residential development that are able to come forward for development is maintained at any one time, so that there is sufficient land available to meet the annual requirements for housing need (currently 194-314 dwellings).
Outcome	2018	767 dwellings.
	2017	1177 dwellings.
Target met?		Yes.
Comments (including any risks to delivery)		The pipeline supply of dwellings is well in excess of the requirement.
Action		None.

Planning Permissions in 2018[2]

Full planning permission was granted for a total of 156 additional dwellings (all full permissions) on 96 sites during 2018. This was a higher figure than 2017 but below average for the past 5 years (268 dwellings) – see Figure 4 below.

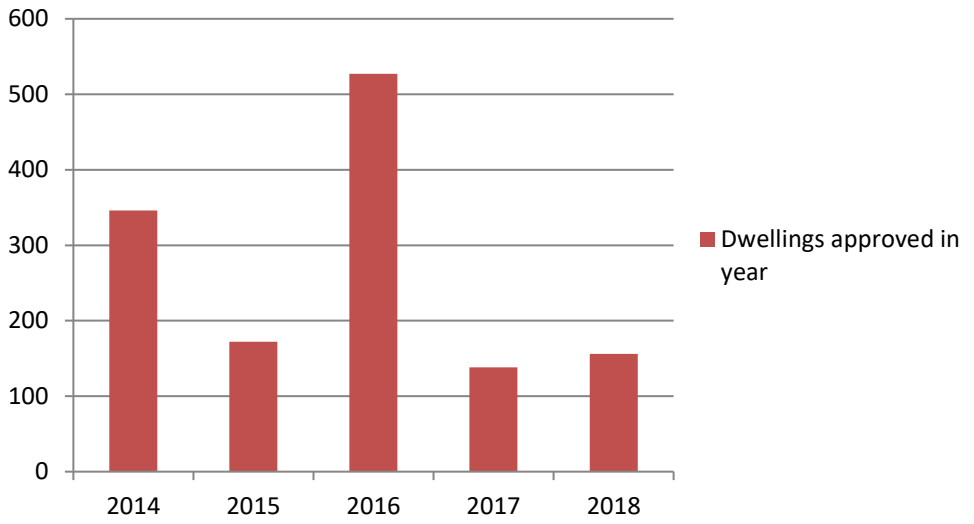

Figure 4: Dwellings approved each year (excluding outline permissions)

INDICATOR – Planning permissions for housing in the year		
Plan Objective		Plan Objective 5: Ensure access to housing for all.
Target		Permissions to ensure there is sufficient land available to meet the annual requirements for housing need based on the States' housing indicator: 97-157 dwellings per annum (68-115 private market, 29-42 Affordable Housing).
Outcome	2018	156 dwellings (150 private market, 6 Affordable Housing).
	2017	164 dwellings.
Target met?		Yes for private market housing. No for Affordable Housing.
Comments (including any risks to delivery)		The States' Strategic Housing Indicator relates to the completion of dwellings rather than planning permissions. A comparison is provided here for information to consider the rate of supply of sites through the planning system. The outcome for private market housing is within the required range. The delivery of Affordable Housing will be kept under review. 50

[2] These figures represent the net change in new dwellings. For example, a scheme to demolish one house and replace it with five flats is counted as +4 dwellings and a scheme to demolish a house and replace it with another house involves no net gain in dwellings and is counted as 0. A dwelling is defined as a self-contained unit of accommodation, i.e. where the dwelling is designed for the occupants to share the kitchen, bathrooms and living rooms.

	Affordable Housing dwellings were given planning permission in 2017.
Action	None.

INDICATOR – Profile of sites		
Plan Objective		Plan Objective 5: Ensure access to housing for all.
Target		n/a
Outcome	2018	**Number of dwellings** / **Number of sites** Loss: 2 No gain: 30 1-5: 57 6-10: 4 11-19: 3 20 +: 0
	2017	**Number of dwellings** / **Number of sites** Loss: 1 No gain: 16 1-5: 53 6-10: 2 11-19: 2 20 +: 1
Target met?		n/a
Comments (including any risks to delivery)		A significant majority or the planning permissions in 2018 were for sites of between 1-5 dwellings. The profile of sites coming forward under the IDP will continue to be monitored in relation to delivery of Affordable Housing (Policy GP11) –see below.
Action		None.

Location of Development

The approvals in 2018 represent a split of 90 dwellings [58%] in Main Centres, 20 [13%] in Local Centres and 46 [29%] Outside of the Centres. The pipeline supply represents a split of 520 dwellings [68%] in Main Centres, 61 [8%] in Local Centres and 186 [24%] Outside of the Centres.

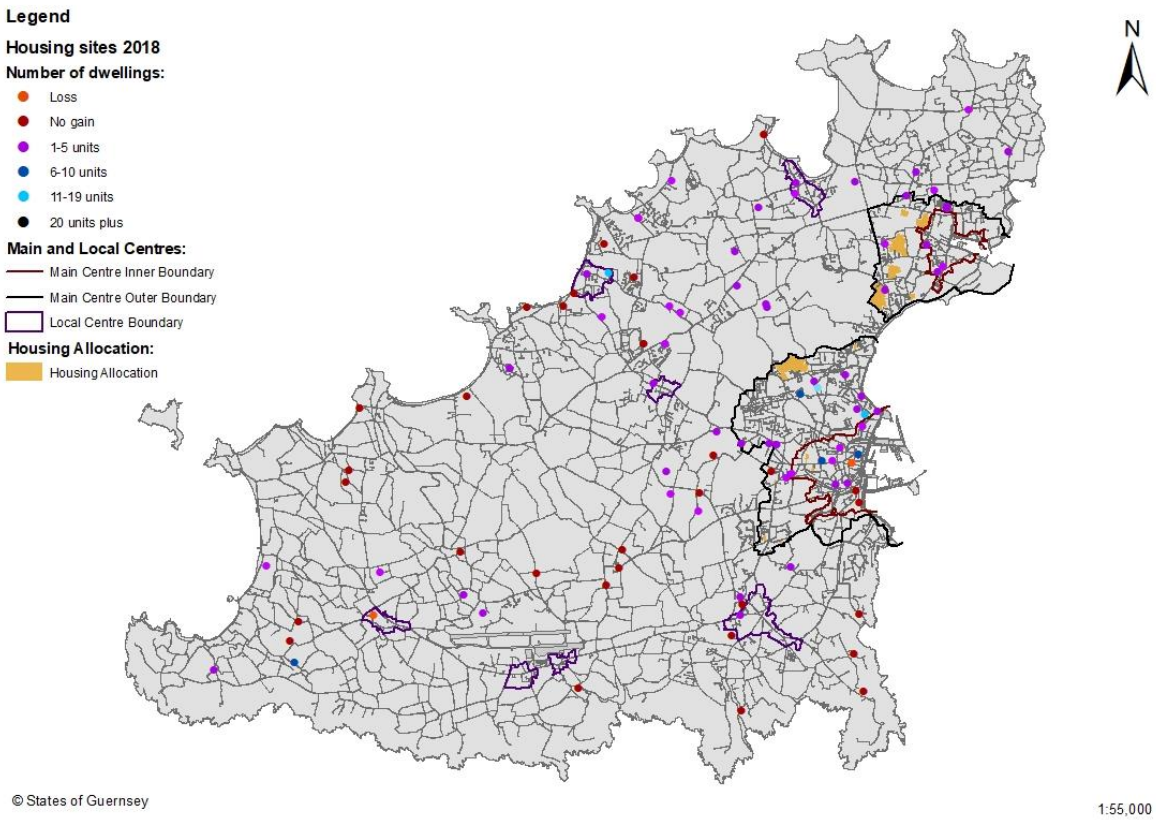

Figure 5: Dwellings approved in 2018

During the Public Planning Inquiry for the IDP, the former Environment Department indicated that the Strategic Housing Land Availability Assessment indicates that circa 80% of supply would come from the Main Centres and this would help deliver the strategy of concentrating development in and around the Main Centres. This is not a target but an indication of how the IDP policies would deliver the spatial strategy in terms of housing development. Although the percentage of housing supply from Main Centres is lower than anticipated, the majority is still located in Main Centres and the IDP policies are therefore effective in delivering the Spatial Strategy of the SLUP.

The vast majority of dwellings approved Outside of the Centres in 2018 relate to subdivision of existing buildings or conversion of existing buildings. In these areas no new build dwellings were approved. 24% of the dwellings in the pipeline supply are located Outside of the Centres however a significant proportion of these are on sites permitted prior to the adoption of the IDP under Rural Area Plan Policy RH2 for social housing. Since the adoption of the IDP, permissions for residential development Outside of the Centres have only been to convert redundant buildings or sub-divide existing buildings or to replace dwellings on a one for one basis, making efficient use of existing sites and redundant buildings.

Concerns have been raised from time to time by some Deputies and members of the public about the 'overdevelopment' of the North of the Island and how this may be being exacerbated by the spatial strategy that the States has approved in the SLUP and latterly the IDP. The Authority has not received any evidence to demonstrate or support claims and comments which appear to be anecdotal. The spatial strategy of concentrating development

in the urban centres has been in place for nearly 30 years and has been generally accepted as successful in preserving the Island's countryside and preventing wholesale suburbanisation.

However, in some respects, a perception of potential overdevelopment is understandable as most of the larger allocated housing sites designated in the IDP are in the St Sampson/Vale Main Centre and Main Centre Outer Area, although not yet developed. However, the St Sampson/Vale Main Centre and Main Centre Outer Area represents a relatively small part of the total land area of those parishes and development elsewhere in these parishes, particularly new residential development, is highly constrained as it is Outside of the Centres.

	St Sampson / Vale Main Centre and Outer Area	St Peter Port Main Centre and Outer Area	Local Centres	Outside of the Centres
Pipeline Supply at end of 2018	232	288	61	186
Permissions 2018	16	74	20	46
Completions In 2018	4	85	2	70

Figure 6: Comparison of the supply of housing land and completed residential developments (number of dwellings) between the Main Centres, Local Centres and Outside the Centres

Figure 6 shows that the focus of development continues to be on the St Peter Port Main Centre and Outer Area, and elsewhere in the Island. The Authority does recognise, however, that the 'potential' yield from Development Frameworks approved to date for sites in the St Sampson/Vale Main Centre (see Figure 7 below) may mean this changes in future but this is 'potential' rather than actual development and not all Development Frameworks may be taken through the planning process or subsequent permissions taken up. This issue will be kept under review in future monitoring.

Approved Development Frameworks	Potential yield (from DF)	Net Dwellings Approved	Dwellings completed
Cleveleys Vinery	19-29	0	0
Les Bas Courtils	6-12 (in addition to those approved)	5	0
Camp Dolent	8-12	0	0
English & Guernsey Arms	Not stated	0	0
Le Maresquet	21-38	0	0
Pointues Rocques	75-125	0	0

Figure 7: Development Frameworks for sites in the St Sampson / Vale Main Centre (as at May 2019)

Comments from a number of sources as part of the consultation for this AMR expressed concern at the potential through IDP policies to develop greenfield sites and suggest that some form of sequential test to encourage the development of brownfield or allocated housing sites first could be adopted.

The IDP has to balance the requirement for a supply of land for development with the protection of the most important green spaces. The areas of Important Open Land designated through the IDP, together with the spatial strategy, at a high level, places an emphasis on brownfield development. Policies do allow for some greenfield sites within the Centres only to be developed for housing where this accords with IDP policy and this reflects the SLUP requirement to balance the development demands on land generally and that the SLUP recognises that some greenfield land will need to be identified for housing development.

Figure 8 below assesses where new residential development has been permitted within the Main Centres in terms of greenfield and brownfield sites to monitor how effective policies are at focusing development within Centres on brownfield sites in further detail. Island-wide there were 12 greenfield sites approved for housing in 2018 and 84 brownfield sites - 1 greenfield site in a Main Centre, 1 in Cobo Local Centre and 1 in L'Islet Local Centre, the remainder Outside of the Centres related to conversions of redundant horticultural or agricultural buildings that are considered to be greenfield sites in planning law. Therefore only 3% of permissions in 2018 were for greenfield sites which did not involve the re-use of an existing building.

Overall greenfield sites represent a small proportion of the sites given permission for housing development since the adoption of the IDP to the end of 2018. In the Main Centres, greenfield sites given permission represent 0.1% of the total area of the St Peter Port Main Centre and Main Centre Outer Area and 0.02% of the total area of the St Sampson / Vale Main Centre and Main Centre Outer Area. It is therefore considered that the IDP is effective in meeting the SLUP requirement to "promote the development of pre-used brownfield sites in order to maximise the use of land and buildings in the most efficient and effective manner" (Policy SLP18).

This monitoring will inform a review of the areas of Important Open Land in the Centres as part of and alongside the IDP 5 year housing land supply review as the two are linked – i.e. the relationship between open land and the built environment within the Centres which could have changed over time. This will also give the opportunity for an evidence based review of the criteria / definition of Important Open Land to make sure it is still appropriate and allow consideration of whether there is evidence that some designations need to be added or changed in view of development which has happened over the first 5 years of the IDP.

2017 AMR Action Update – the 2017 AMR had an action for future monitoring to establish where new residential development is located within the Main Centres and Main Centre Outer Areas in terms of greenfield and brownfield sites. Figure 8 below summarises the planning permissions granted in 2018 in the Main Centres and Main Centre Outer Areas.

	Sites		Dwellings	
	Brownfield	Greenfield	Brownfield	Greenfield
St Peter Port Main Centre	11	0	23	0
St Peter Port Main Centre Outer Area	11	1	45	6
St Sampson's / Vale Main Centre	3	0	3	0
St Sampson's / Vale Main Centre Outer Area	5	0	13	0

Figure 8: Dwellings approved in 2018 in Main Centres / Outer Areas by type of site

The permission for a greenfield site in St Peter Port Main Centre Outer Area was the housing allocation site on Maurepas Road, St Peter Port, for 6 dwellings for the Guernsey Housing Association. The permission in Cobo Local Centre was for 13 dwellings on the Mycroft/Warma site which has an approved Development Framework. The permission in L'Islet Local Centre was for 1 dwelling.

Similarly, although the SLUP sets out the high level spatial strategy with the intention of generally concentrating development on the Island within and around the edges of the urban centres and IDP policies are currently achieving this, it is important to know the location of residential development within the Main Centres and Main Centre Outer Areas boundaries for the purposes of establishing where most development is happening and where the greatest density is occurring within the Centres. This data will be able to inform the need for future housing land at the IDP 5 year review of housing land supply and where this would be most appropriately located within the Main Centres.

2017 AMR Action Update - the 2017 AMR had an action for future monitoring to include the locations of residential development within the Main Centres and Main Centre Outer Areas (permissions, commencements and completions since the adoption of the IDP) to determine if there is a pattern or trend and to inform future decisions about housing land supply. This is shown in Figures 9 and 10 below.

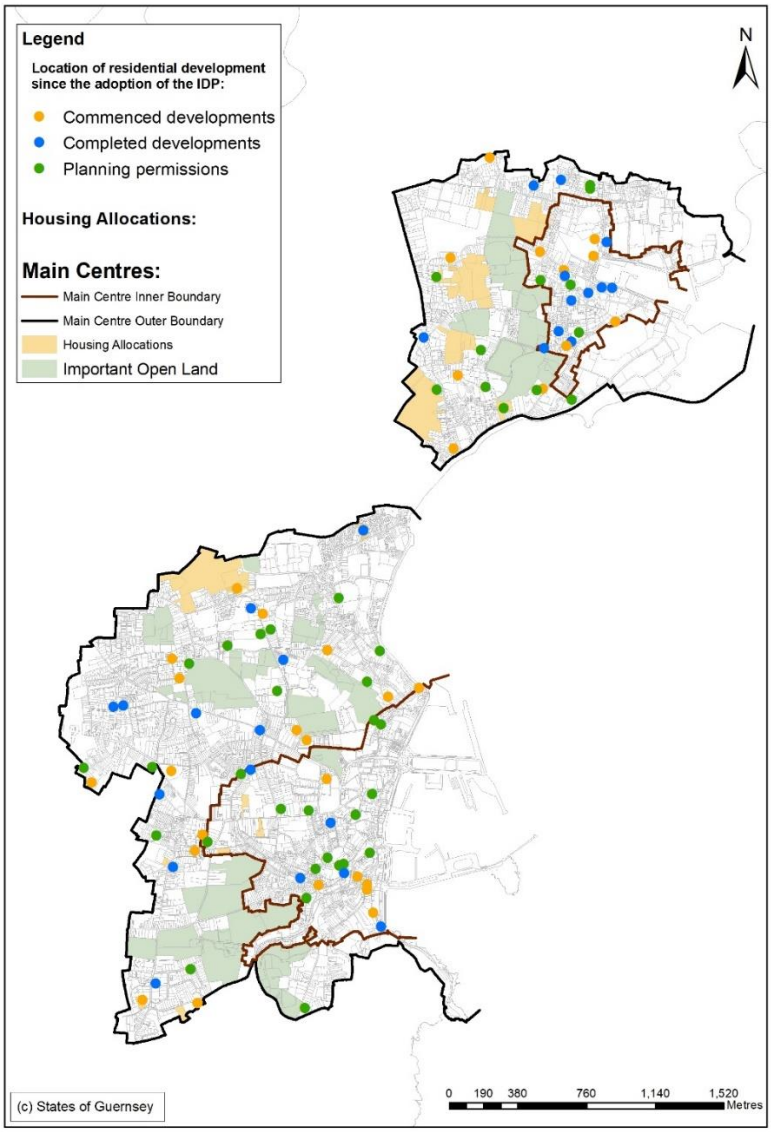

Figure 9: Location of residential development in the Main Centres / Outer Areas since the adoption of the IDP in November 2016

	St Peter Port Inner Area	St Peter Port Outer Area	St Sampson / Vale Inner Area	St Sampson / Vale Outer Area	Total sites
Planning Permissions	14	14	3	9	40
Commenced Developments	7	20	8	7	42
Completed Development	4	6	7	1	18
Total sites	25	40	18	17	**100**

Figure 10: Location of residential development sites approved (but not yet commenced), commenced or completed since the adoption of the IDP in the Main Centres and Main Centres Outer Areas by the number of development sites

Figure 9 and 10 show that development is fairly evenly spread across the Main Centres and Main Centre Outer Areas and there is not a concentration of development in any one location. The largest proportion of sites are within the St Peter Port Main Centre Outer Area which includes the most land of the 4 areas assessed. The split in sites in St Sampson / Vale to the west and east as shown in Figure 9 relates to the existing built-up areas and the large swathe of agricultural land and other open land including Delancey Park (all Important Open Land) that runs through the Main Centre, indicating how effective this mechanism is in retaining open space and greenfield land in Centres.

The Policy & Resources Committee (P&RC) in its response to consultation for the AMR comment that "the focus of development to main and local centres is core to the IDP. It is evident from the quarterly reporting that a number of developments have taken place under various policies on sites outside the main and local centres. PRC requests that the DPA includes an analysis of the profile of various types of development between the main and local centres and outside the centres to provide an assessment of the success of the Plan in preventing the urbanisation of more rural areas". As stated above 24% of the dwellings in the pipeline supply are located Outside of the Centres however a significant proportion of these are on sites permitted prior to the adoption of the IDP under Rural Area Plan Policy RH2 for social housing. Since the adoption of the IDP, permissions for residential development Outside of the Centres have only been to convert redundant buildings or sub-divide existing buildings or to replace dwellings on a one for one basis, making efficient use of existing sites and redundant buildings and through consideration of landscape impact in each case, the effect of urbanisation of more rural areas is minimised.

Types of development and dwellings permitted

The types of development permitted in 2018 are as follows:

Type of development	Number of Dwellings			
	Main Centres	Local Centres	Outside of the Centres	Total
New build	13	15	0	28
Re-development	60	6	8	74
Sub-division	0	0	11	11
Conversion	18	0	27	45
Loss of units	-1	-1	0	-2
Total	**90**	**20**	**46**	**156**

Figure 11: Types of development permitted in 2018

The majority of permissions in 2018 were for the re-use of existing buildings / previously developed sites (83%) with the remainder (17%) new build development. The IDP Spatial Policy concentrates the majority of new development in the Main Centres and the Main Centre Outer Areas with provision for limited development in the Local Centres. The result of this policy, in combination with the designation of Important Open Land in Centres, is reflected in the types of development permitted.

The States' Strategic Housing Indicator is based on the findings of a report by KPMG (Guernsey Housing Market Review, 2017) that was noted by the States as a resolution to the Policy Letter 'Local Market Housing Review and Development of Future Housing Strategy' in July 2018. The KPMG report sets-out the requirement for housing by both tenure and the size of the dwelling (expressed as a number of bedrooms). The split by number of bedrooms was not expressly endorsed by the States, however it represents the most up to date information available regarding housing need.

2017 AMR Action Update – the 2017 AMR had an action to introduce monitoring of the number of bedrooms in new dwellings. The Authority introduced the monitoring of housing by the number of bedrooms for 2018 and this has been included in the Quarterly Monitoring Reports. This monitoring will inform a more refined analysis of the pipeline supply in the future. This includes analysis of the nature of the stock of housing being replaced, in addition to details of new housing being permitted – see Figures 12, 13 and 14 below.

The number of dwellings permitted in 2018 shown in Figure 11 above relates to the net number of dwellings in each development e.g. where 3 new dwellings replace 1 dwelling this is counted as 2. The size and type of new dwellings permitted in 2018 are shown in Figures 12 and 14. 202 new private market dwellings will replace 52 dwellings as shown in Figure 13 and with 6 new Affordable Housing dwellings, gives the net figure of 156 dwellings permitted in 2018.

New Dwellings – Private Market	Number of bedrooms					
Unit type	**1**	**2**	**3**	**4+**	**HMO**	**Total**
Detached	6	7	18	32	0	63
Semi-detached	7	29	10	4	2	52
Terraced	5	8	7	6	0	26
Flat	28	29	3	1	0	61
Sheltered	0	0	0	0	0	0
Total	46	73	38	43	2	**202**

Figure 12: Private market dwellings approved (gross) in 2018 by unit type and number of bedrooms

Replaced Dwellings	Number of bedrooms					
Unit type	1	2	3	4+	HMO	Total
Detached	1	10	16	10	1	38
Semi-detached	1	3	2	2	0	8
Terraced	0	0	0	0	0	0
Flat	2	4	0	0	0	6
Sheltered	0	0	0	0	0	0
Total	4	17	18	12	1	**52**

Figure 13: Dwellings to be replaced via the implementation of new dwellings approved in 2018 by unit type and number of bedrooms

New Dwellings – Affordable Housing	Number of bedrooms					
Unit type	1	2	3	4+	HMO	Total
Detached		1				1
Semi-detached						
Terraced		3	2			5
Flat						
Sheltered						
Total		4	2			**6**

Figure 14: Affordable Housing dwellings approved in 2018 by unit type and number of bedrooms - N.B. This relates to 1 permission for Affordable Housing that did not involve the replacement of any dwellings

The States' Strategic Housing Indicator relates to completed dwellings rather than planning permissions (the States resolution refers to 'creating 635 new units of accommodation'). Monitoring of the delivery of housing against the housing indicator is one of the workstreams endorsed by the States, which includes the research and establishment of an appropriate housing data collection model and data collection processes. In future AMRs, an assessment of delivery of completed dwellings against housing need in terms of Affordable Housing and Private Market Housing and the size of the dwelling could be provided if the data gathering model is introduced. The Authority does nevertheless collate data on the completion of residential developments as set out below.

In the meantime, the Planning Service has undertaken an initial analysis of the delivery of housing against housing needs using information available in the KPMG report and the most recent Annual Residential Property Stock Bulletin 2018 as published in March 2019 which includes data on the change in the number of units per year.

This has shown that the requirement for private market housing is primarily 2 and 3 bedroom units. There is a lesser requirement for 1 bedroom units and given an over delivery of 4+ bedroom units these are not required to meet housing need. The emphasis for

Affordable Housing units appears to be 3 bedroom units, and to a lesser extent 1 bedroom units needed compared to the 2017-2021 estimates in the KPMG report. The C*f*E&SS notes in its response to the consultation for the AMR that "work has progressed on reviewing the Island's social housing stock to determine exactly what sized properties existing tenants and waiting list applicants require now and in the future. A complete review of the Island's social rental housing stock is underway to better determine the sized properties that are required compared to those that actually exist". This can be taken into account in future analysis of the delivery of housing against housing needs.

The data collection model described above will compare completed dwellings with housing need. It is also, however, important to review the nature of planning permissions in relation to housing need. This allows for monitoring of the implementation of the IDP's housing policies which require a mix of dwelling sizes reflective of the demographic profile of households requiring housing based on the most up to date evidence available.

Figure 15 below shows the split in size of private market units that is considered appropriate on sites capable of providing a mix of dwellings – based on the Planning Service's initial analysis - and compares this with the dwellings permitted in 2018.

Size of unit	Appropriate % of units required	% of units permitted
1 bed	9-16%	28
2 bed	42.5-46%	37
3 bed	41.5-45%	12
4 & 5+ bed	0%	22

Figure 15: Size of private market dwellings permitted in 2018 (net of dwellings to be replaced via the implementation of new dwellings approved) compared to identified housing need

Figure 15 shows that overall there has been an over delivery of permissions for 1 bed and 4/5+ bed private market dwellings and an under delivery of permissions for 2 and 3 bed private market dwellings. This is not an exact comparison, however, as not all sites can provide a mix of dwellings (there was a large number of single dwelling permissions – see the Indicator 'Profile of Sites' above) and there are other factors to consider on a site by site basis taking account of other IDP Policies such as making effective and efficient use of the land; respecting the character of the surrounding area; and taking into account any other constraints specific to the site, for example traffic implications, flood risk etc. This issue will however be kept under review in future monitoring.

Developments Commencing and Completed[3]

Whilst the pipeline housing supply requirement in the IDP relates only to the number of permissions granted, it is also useful to monitor how many of these permissions get built

[3] The Guernsey Annual Residential Property Stock Bulletin (March 2019) includes details of the stock of dwellings in the Island and the change to the number of units in 2018. The assessment of the change of units uses a different methodology to the Planning Service. The completions shown in Figure 16 are those dwellings that have been constructed in accordance with a planning permission and a Completion Certificate has been issued by the Planning Service's Building Control team.

(are taken-up). Figure 16 shows development that has commenced or was completed during 2018 (including developments approved under previous development plans and under the IDP).

	Commencements Private		Commencements Affordable		Completions Private		Completions Affordable	
	Sites	Units	Sites	Units	Sites	Units	Sites	Units
Total	46	62	3	46	29	75	5	86
Running total since IDP adoption	94	162	7	117	68	144	7	93

Figure 16: Developments commencing and completing during 2018

The number of dwellings completed in 2018 (161) is around double those completed in 2017 and is similar to the number of dwellings permitted in the year (156). Over the past 5 years the number of dwellings under construction at the end of each quarter has remained relatively stable. The average is 332 dwellings.

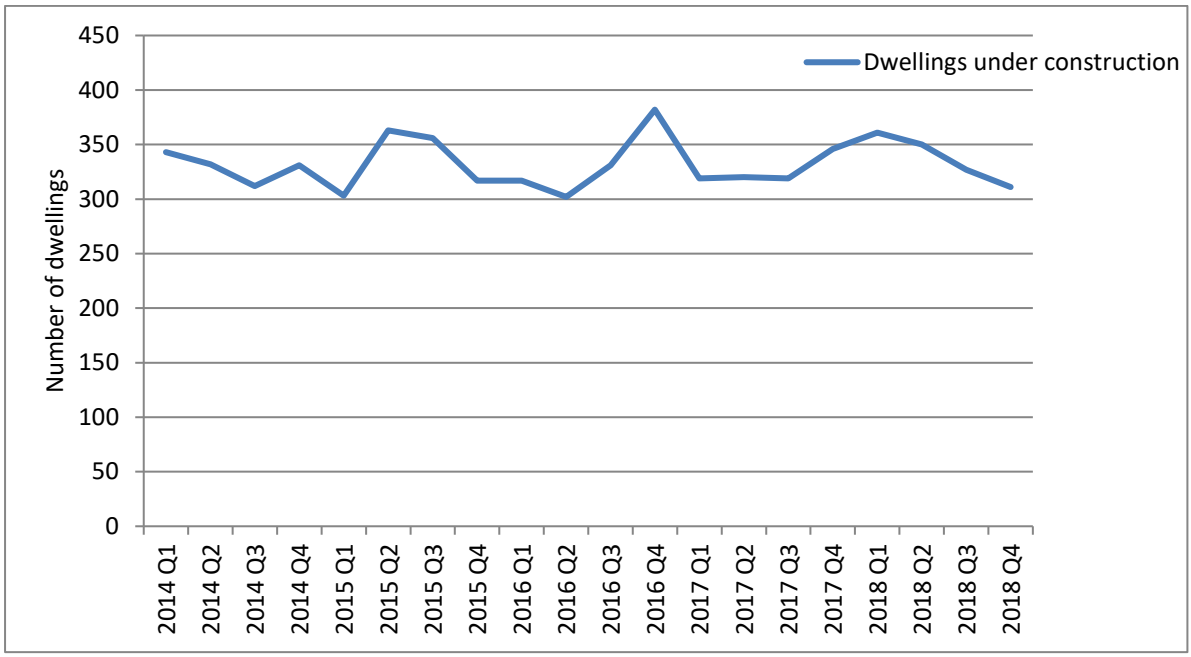

Figure 17: Dwellings under construction

In its response to the consultation for the AMR, the P&RC comment that “the quarterly reports indicate that there are a number of permissions which are not progressed to development, but at present there is little context against which to assess whether this is unusual. The DPA is asked to consider whether there have been any noticeable changes to the trend in the number of permissions successfully completed or expired, and what factors appear to influence progression (e.g. location, type of development, size of development)”. Some additional information is provided in Figures 18 and 19 below.

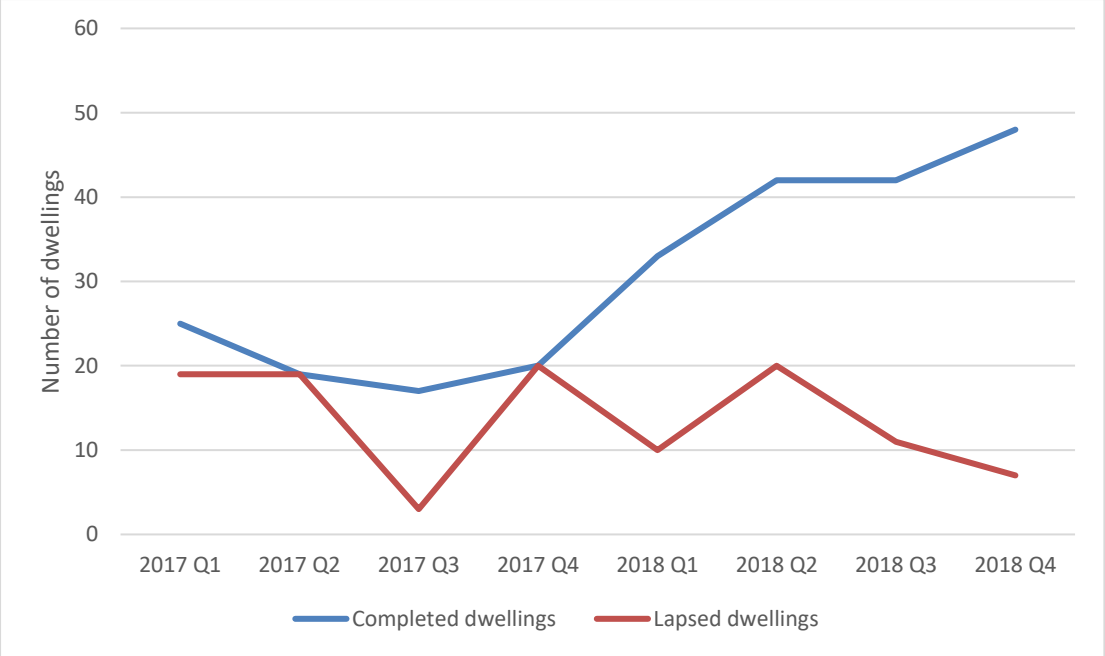

Figure 18: Trend in the completion of dwellings and permissions lapsing

Figure 18 above shows that over the past 2 years there has been an increase in the completion of dwellings and a reduction in the number of dwellings where construction has not begun and the planning permission therefore not been taken up, suggesting an upturn in construction activity.

	Pipeline Supply	%	Completed 2018	%
Location – number of dwellings				
Main Centres	520	67.8	89	55.3
Local Centres	61	8.0	2	1.2
Outside the Centres	186	24.2	70	43.5
Type of development – number of dwellings				
New build	182	23.6	50	30.3
Re-develop	394	51.0	91	55.2
Sub-division	52	6.7	8	4.8
Conversion	144	18.7	16	9.7
Loss of units	-5		-4	
Number of sites by number of dwellings				
0-4	215	85.3	26	78.8
5-9	16	6.35	2	6.1
10-19	16	6.35	1	3.0
20+	5	2.0	4	12.1

Figure 19: Comparison of pipeline supply and completed sites / dwellings in 2018

In terms of what factors appear to influence progression, Figure 19 above shows that sites Outside of the Centres have been progressing more quickly. This largely relates to Guernsey Housing Association sites permitted under the Rural Area Plan for social housing. This trend

is therefore not expected to continue with a greater proportion of completions being on Main Centre sites. The types of development progressing appears to be generally consistent with the proportions in the pipeline supply with around 70% of dwellings on previously developed sites, reflecting the spatial strategy of the IDP and the approach of the previous Development Plans. The size of the sites progressing is also generally consistent with the pipeline supply with a significant proportion of permissions for small sites. 3 of the 20+ dwellings sites completed in 2018 were for the GHA developments.

The progress of sites that have been under construction for a long period is monitored here to assess whether there are any trends in slow build-out of sites. From the date of planning permission being granted, no site has been under construction for more than 5 years. 12 sites have been under construction for between 4 and 5 years at the end of 2018. 9 of these sites are for either a replacement dwelling or 1 dwelling. The other sites include Ebenezer Church, St Peter Port (12 dwellings), Rue Du Tertre, Vale, (43 dwellings) and 32 & 34 Fountain Street, St Peter Port (7 dwellings). These developments have stalled and re-started for various reasons that appear to be unrelated to any planning issues.

During the Public Inquiry into the draft IDP there were a large number of representations from the property industry regarding the potential impact of the Affordable Housing policy on the viability of development. No site that is part of the current pipeline supply (767 dwellings) has a policy requirement for Affordable Housing and there was no feedback as a result of consultation for this AMR from agents that planning policy requirements are resulting in unviability. The slow delivery of sites is likely to be the result of wider economic issues and a slow housing market.

The C*f*E&SS in its response to the consultation for this AMR wishes to raise its frustration at the speed at which some States-owned land becomes available for housing development, it states that “some sites have been raised as potential for acquisition for Affordable Housing development but, with one significant site in particular, it carries with it uncertainty around the timing. Again, this leaves planning the site acquisition requirements to meet the affordable housing indicator in an uncertain position”. This is an issue beyond the control of the Authority however progress with the delivery of Affordable Housing will continue to be monitored, as will progress with the larger housing allocations where an element of Affordable Housing would be expected to be delivered.

The Authority and land planning does not have the legal mechanism to require unimplemented planning permissions to be implemented. The Authority will work proactively to promote development of the Harbour Action Areas and Regeneration Areas, and Development Frameworks for other sites enable the private sector to identify appropriate opportunities for investment. The Authority intends to regularly liaise with C*f*E&SS to update on progress with the larger housing sites. Through this mechanism there will be the opportunity to explore any possible action to encourage the implementation of permissions.

Housing Supply

In accordance with the requirements of the SLUP the IDP identifies a minimum five year land supply for housing. At the time the Island Development Plan came into force the

annual Strategic Housing Indicator was 300 additional new dwellings per year giving a five year land supply requirement for 1,500 dwellings. In July 2018, the States resolved to agree the States' Strategic Housing Indicator be set at completing 635 new units of accommodation between 2017 and 2021, with a plus or minus variance of 149 new units. Below is a review of the supply in relation to the new indicator.

It should be noted that the indicator relates to the completion of new dwellings not the supply of land through the planning system. The supply of land must be sufficient to allow for the development of at least the number of units expressed as the States' Strategic Housing Indicator. The States has no control over implementation of planning permissions and this is why the Indicator is not expressed as a target. In response to consultation for the AMR, the C*f*E&I comment that "one of the most fundamental implementations for the Island Development Plan (IDP) was the approved States' Strategic Housing Indicator. The States agreed to change existing terminology from 'States' Strategic Housing Target' to 'States' Strategic Housing Indicator'. This change was implemented to better reflect the purpose of the Indicator, as opposed to a Target, which wrongly assumed that meeting a Target was solely within the control of the States of Guernsey. The States' Strategic Housing Indicator informs housing land supply to ensure that a sufficient quantity of housing provision exists to meet the Island's identified housing requirements. The States cannot control exactly how many units of accommodation are built; this control remains with the landowners and developers. It is hoped that the term 'Indicator' now better reflects this position".

There will be a review of housing land supply five years from the adoption of the IDP (November 2021). The housing land supply identified in the AMR meets the SLUP requirement for a minimum of five years supply and therefore there is no immediate requirement to amend the IDP to identify additional housing land supply. The level of land supply against future requirements will be taken into account when providing for the next five year housing land supply as part of the five year review of the IDP in accordance with the SLUP.

The C*f*E&I note that "it is essential that these Indicators remain up to date and are adjusted as the Island's housing requirements change. An essential area of work that needs to be developed further is developing a model to determine, and monitor, exactly what the Island's housing requirements are now and in the future and, as a minimum, to have this data broken down by type, size and tenure. Only then can the Committee be sure that the best information is informing the supply of housing that needs to come forward; this will clearly feed directly into the IDP. This is a complex piece of work that requires detailed data modelling which, to date, has not been resourced. However, it remains a priority and it is hoped that significant progress will be made in this area during the next year to enable a more positive update". Any revisions to the housing indicator can be taken into account in the 5 year review of the IDP.

The methodology used to identify the supply of land for housing to meet the housing indicator (the Strategic Housing Land Availability Assessment, 2014 (SHLAA)) identifies a 5 year supply of housing based on:

A. Dwellings with permission / under construction	713
B. Allocated sites (estimated lower yield)	718
C. Windfall allowance	150-300

Figure 20: SHLAA Housing Supply

A summary explanation of the methodology used to identify the supply of land for housing is available here ('Approach to the Housing Sites Allocations in the Draft Island Development Plan, December 2014').

A. Dwellings with permission / under construction

The current pipeline supply (dwellings with permission or under construction) is 767 dwellings. See Figure 1 above.

B. Allocated sites

There are 15 housing allocations in the IDP in the Main Centres and Main Centre Outer Areas which are identified to be used for housing development including ancillary complementary development. The progress in the delivery of housing on these sites as at the end of 2018 is set out in Figure 21 below.

Housing allocation sites	Progress	Net Units Approved	Estimated Yield (SHLAA[4] / DFs[5])
Belgrave Vinery	None		158-285
Bougourd Ford	None		15-20
Braye Lodge	Development Framework approved		10-20
Cleveleys Vinery	Development Framework approved		19-29
Education offices	None		16-32
Priaulx Garage	Permission 2017 (under construction)	19	-
Franc Fief	None		133-263
King's Club	Permission 2016	13	-
La Vrangue	None since the adoption of the IDP		186-334
Les Bas Courtils	Permission for works to house / barn 2017. Development Framework approved for remainder	5	6-12
Maurepas Road	Permission 2018	6	-
Petites Fontaines	Permission 2016	10	-

[4] Strategic Housing Land Availability Assessment
[5] Development Frameworks

Housing allocation sites	Progress	Net Units Approved	Estimated Yield (SHLAA[4] / DFs[5])
Pointues Rocques	Draft Development Framework published		55-138 (SHLAA)
Saltpans	None		78-178
Warry's Bakery	Reserved matters permission 2016 – development completed	20	-
	Total	**73**	**676-1311**

Figure 21: Progress of housing site allocations

As at the end of 2018, 73 dwellings have been permitted on allocated sites. 53 of these dwellings form part of the pipeline supply. Taking account of updated yields from approved Development Frameworks, the remaining supply from allocated sites is therefore at least an estimated 676 dwellings.

C. Windfall allowance

The windfall allowance[6] (sites other than the allocated sites) in the 5 year supply is up to 20% i.e. up to 20% of 1500 dwellings which is 300 dwellings over 5 years, which was the indicator at the time the IDP was drafted. This is based on historic trends of permissions for smaller sites and is an assumed allowance, not a target or limit, but is monitored here to inform future iterations of the Strategic Housing Land Availability Assessment and at the 5 year housing land supply review of the IDP the allowance can be altered if needed based on the monitoring.

150 dwellings were permitted on windfall sites in 2018 and since the adoption of the IDP 301 dwellings have been permitted on windfall sites. Of these 301 dwellings, 149 dwellings were permitted on smaller sites (1-4 dwellings). The number of dwellings delivered through windfall to date has therefore exceeded expectations.

Housing supply

In summary, the housing supply at the end of 2018 is shown in Figure 22.

Source of housing supply	
Dwellings with permission / under construction	767
Remaining capacity on allocated sites (lower estimated yield)	676
Windfall allowance	150-300
Total (with full windfall allowance)	1743

Figure 22: Source of housing supply

[6] In the Strategic Housing Land Availability Assessment (SHLAA) only sites of 0.25 acres (0.1 Ha, 0.6 vergée) and over or that could provide 5 or more dwellings have been identified as contributing to the supply of land. It was envisaged that mainly sites below this threshold would contribute to windfall provision, although sites over this threshold may come forward as windfall. The Plan does not include housing site allocations in the Local Centres or Outside of the Centres and the SHLAA did not include those locations in the land supply. Any dwellings permitted in these locations would form part of the windfall provision.

The supply of housing land is currently well in excess of 5 years supply (486-784 dwellings). Concern has been expressed from a number of sources that the IDP should be amended to reflect the new, lower, housing indicator. The new Strategic Housing Indicator of 635 new units of accommodation between 2017 and 2021 (+/- 149 units) relates to the delivery of dwellings, not planning permissions. There were 165 dwellings completed in 2018 and 81 dwellings in 2017 (see Figure 23 below), suggesting that the supply of land via planning permissions is broadly appropriate to meet housing need at the current rate of delivery. The relationship between the supply of housing land and the completion of dwellings in relation to the Indicator will be kept under review in future monitoring and will inform the 5 year review of housing land supply in the IDP.

	Strategic Housing Indicator (2 years)	Completed dwellings (2017 and 2018)
Private Market dwellings	136 – 230	149
Affordable Housing dwellings	58 – 84	97
Total	**194 - 314**	**246**

Figure 23: Dwellings completed in relation to the Strategic Housing Indicator (2017-2018)

There is therefore no proposal to consider amendment to the IDP policies in advance of the 5 year housing land supply review. At that stage there are a number of possible options for the IDP given the excess supply in relation to the Indicator. The IDP has a life of 10 years but currently only identifies housing land for 5 years in accordance with the SLUP. An assessment will need to be made about what the implications are for the 10 year housing land supply. Historically the Island has left the development of housing land to market forces, relying on the market bringing forward housing sites as and when it is required over the lifetime of the Plan and that the market is the best placed to ensure against oversupply. It may be that no additional land would need to be identified at the 5 year review of the housing land supply in the IDP to provide for the second 5 years of the Plan, given the delivery of windfall sites in excess of the forecast and the amount of allocated housing sites remaining undeveloped.

There are other options which include government intervention in the market by reducing the land supply for housing through changes to the existing allocations or other policy mechanisms. The full implications of intervention and impacts on other IDP policies are best considered comprehensively at the 5 year housing land review of the IDP when trends (including population trends as a result of population policy) and indicators have had more time to establish. In addition, the States agreed the States' Strategic Housing Indicator will be reset at least every 5 years. The implications of any changes to the Indicator will be considered as and when it is agreed by the States.

INDICATOR – Housing Land Supply		
Plan Objective		Plan Objective 5: Ensure access to housing for all.
Target		Minimum 5 year supply of housing land – the Strategic Housing Indicator is presently 635 new units of accommodation between 2017 and 2021 (+/- 149 units).
Outcome	2018	1743
	2017	2146
Target met?		Yes.
Comments (including any risks to delivery)		There will be a review of housing land supply before the end of five years (2021), unless monitoring indicates a more urgent need to review the land supply sooner.
Action		None.

Strategic Housing Land Availability Assessment

The Strategic Housing Land Availability Assessment (SHLAA) was produced in June 2014 and is part of the evidence base that informed the preparation of the draft IDP. It is effectively a 'stock check' of the supply of potential development sites for housing on Guernsey. It provides information on the suitability and availability of each site; whether the development of a site is considered to be achievable; and if there are any significant constraints to development. It also demonstrates whether there is an adequate supply of land to meet the Island's Strategic Housing Indicator over the life of the IDP.

The SHLAA identified the 15 sites in Main Centres and Main Centre Outer Areas that were allocated for housing development in the IDP. A number of other sites identified in the SHLAA as having the potential for development were allocated as Important Open Land, Key Industrial Area or Key Industrial Expansion Area in the Main Centres or Main Centre Outer Areas or are located Outside of the Centres following the technical studies to identify the Important Open Land, employment sites and precise boundaries of the Centres.

The remaining 'developable' and 'deliverable'[7] sites have been reviewed to assess the potential supply of land for housing through further windfall. The remaining sites that do not form part of a housing allocation or have a designation restricting the potential for housing development or now have a full planning permission in the Main Centres and Main Centre Outer Areas, include:

- St Peter Port: 16 sites with a potential yield between 182 and 301 dwellings (143-242 brownfield / 39-59 greenfield); and,
- St Sampson / Vale: 12 sites with a potential yield between 361 and 423 dwellings (329-357 brownfield/ 32-66 greenfield).

The review of the SHLAA takes into account Development Frameworks approved by the Authority. The IDP requires Development Frameworks to be approved for certain sites to guide development. They provide interpretation of policy principles, identify site opportunities and constraints and give practical guidance about how a specific site could be

[7] **Deliverable** sites are those that are considered to be suitable, achievable and available within the next five years. **Developable** sites are those that are considered to be suitable, achievable, and available in the next 5 to 10 years.

developed in a comprehensive and appropriate way including the potential number of dwellings that might be accommodated. They do not, however, give permission for any specific development or number of dwellings.

In 2018 7 Development Frameworks for residential development were approved by the Authority. These were:

- Route Isabelle (St Peter Port Main Centre Outer Area): 7-11 dwellings;
- Hotel Dunchoille (St Peter Port Main Centre Outer Area): 10 dwellings;
- Camp Dolent (St Sampson / Vale Main Centre Outer Area): 8-12 dwellings;
- Les Bas Courtils (St Sampson / Vale Main Centre Outer Area): 6-12 dwellings;
- Cleveleys Vinery (St Sampson / Vale Main Centre Outer Area): 19-29 dwellings;
- Mycroft / Warma (Cobo Local Centre): 15-23 dwellings; and,
- Briarwood (St Martin Local Centre): 15-22 dwellings.

Also published in draft in 2018 were Development Frameworks for:

- Pointues Rocques (revised) (St Sampson / Vale Main Centre Outer Area): 100-150 dwellings; and,
- Le Maresquet (St Sampson / Vale Main Centre Outer Area): 21-38 dwellings.

The Development Framework process is discussed in more detail below.

It is intended to undertake a comprehensive update of the SHLAA in time for the 5 year review of the housing land supply.

Affordable Housing[8]

IDP policy GP11: Affordable Housing requires 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. In some cases the provision of units or, in exceptional cases, off-site land or unit provision is permitted. In addition, some permissions are given for Affordable Housing exclusively (such as developments by the Guernsey Housing Association).

As noted above, in July 2018, the States resolved to agree to separate the States' Strategic Housing Indicator into an Affordable Housing Indicator set at completing 178 units of Affordable Housing over the period 2017-2021 with a plus or minus variance of 32 new units to give the flexibility to react to demand and market changes. This equates to 29-42 dwellings per year over the 5 year period. The *C*fE&SS note that "this implementation gives a tangible figure for the Committee to work towards, and measure itself against, when planning and delivering the affordable housing development programme; this is a very welcome step".

No sites had a Policy GP11 Affordable Housing requirement in 2018. Permission was granted for Affordable Housing in 2018 at Maurepas Road, St Peter Port for 6 dwellings. The total Affordable Housing permitted to date under the Island Development Plan is 56 dwellings.

[8] Affordable Housing is for those households whose needs are not met by, or who cannot afford, accommodation in the private sale or rental market without assistance. It is normally provided through the States of Guernsey or a registered Housing Association.

The C*f*E&SS in its response to the consultation for the AMR comment on the delivery of Affordable Housing. Figure 24 below summarises the Committee's existing Affordable Housing development programme with the Guernsey Housing Association (GHA).

Year Units Completed	Number of Units
2017	45
2018	50
2019	63 *(of which 24 are key worker accommodation)*
2020	37
2021	22

Figure 24: GHA Affordable Housing development programme (N.B. there is a minor difference in the recording of completed Affordable Housing dwellings in 2017 and 2018 between Figures 23 and 24 due to different approaches to monitoring)

The C*f*E&SS notes that "the current programme marginally exceeds the current affordable housing indicator, which is symptomatic of it being planned for before the indicator was set. While this is a very positive step in meeting the island's affordable housing requirements, the current programme will see all its sites developed out by the GHA by 2021. Therefore, work has commenced on identifying future development sites for the Committee to analyse and progress so that the Island's affordable housing requirements continue to be met in the short/medium term".

The C*f*E&SS notes that a lack of information around the number of sites coming forward as a result of Policy GP11 and the speed at which States'-owned sites become available for housing development make it difficult to plan the future programme with accuracy.

In January 2019 a Scrutiny Management Committee Policy Letter 'In-work Poverty Review' included a recommendation to direct the C*f*E&SS, the C*f*E&I and the P&RC to investigate housing policy proposals to support people experiencing in-work poverty and to report back to the States no later than the end of this term with any proposals. The Policy Letter notes that "a key decision for government regarding social housing is identifying a minimum indicator level for provision (how many properties and of which type) and then how to ensure they are delivered". The Policy Letter notes that at the present time there is un-met need for lower cost housing and in terms of future housing policy "a decision needs to be made whether the Government wishes to provide additional social housing to meet this need and thereby potentially lift a significant number of Islanders out of in-work poverty. At the moment the Guernsey Housing Association (the chosen agent of government to deliver the current policy) is not building sufficient numbers of dwellings to meet the existing need". The States noted this recommendation and directed the P&RC to review and report on the work stream in the Future Guernsey Plan in its Policy Letter to be debated on 25th June 2019. The implications of any policy proposals for the IDP will be reviewed in due course and included in future monitoring.

Policy GP11 was amended[9] by the States in approving the IDP. This increased the threshold at which the policy requirement for Affordable Housing applies from 5 or more dwellings to 20 or more dwellings. In 2018 there were 9 permissions for 5 or more dwellings, none of which were for 20 or more. 1 included Affordable Housing (the housing allocation site on Maurepas Road, St Peter Port, for 6 dwellings for the Guernsey Housing Association). The remaining 8 sites would have had a requirement for 20-24% of the developable part of the site for Affordable Housing, or approximately 13 completed dwellings in total, under the policies of the draft IDP had the thresholds not been amended. The delivery of Affordable Housing since the adoption of the IDP has all been through the Guernsey Housing Association. The intention of the IDP through Policy GP11 that Affordable Housing be delivered, in part, by land owners / developers through the uplift in the value of the land when planning permission has been granted has not, as yet, been realised partly due to the raising of the threshold for requirement and partly because of the slow take-up of larger sites.

Policy GP11 includes a transitional period where the requirement for Affordable Housing steps-up each year for the first 3 years from the adoption of the IDP. In recommending the transition period, the Inspectors at the Planning Inquiry felt that this would assist the weak housing market by encouraging developers to bring forward sites sooner. No developments were approved within the first 2 years of the transition period to benefit from the lower requirements. Policy GP11 does however allow for viability to be taken into account with the potential for lower provision of Affordable Housing.

The Policy & Resources Committee (P&RC) in its response to the consultation for the AMR comments that "the introduction of this policy was controversial and the final outcome placed significantly fewer requirements on developers than originally proposed. It is evident from the quarterly and annual reports that it has been applied in very few, if any, cases in the last two years. Given this policy has been "live" for two years, the Policy & Resources Committee requests that the Development & Planning Authority reviews how it has functioned in practice and assess whether:

- It has been or is likely to become effective in achieving the intended objectives;
- It is creating a behavioural distortion in applications to avoid the application of the policy; and
- Whether it would be appropriate to amend the policy to make it more effective and / or reduce behavioural distortions, or rescind the policy".

Policy GP11 has yet to provide any Affordable Housing and as such could be said to be ineffective in achieving the objectives of the SLUP and IDP to deliver Affordable Housing. But this is due, in the most part, to the raising of the threshold for the requirement for Affordable Housing, through amendment when the IDP was debated by the States, so that Policy GP11 does not operate as intended when it was drafted. The Policy will be reviewed as part of the 5 year review of the housing land supply. Any amendment to the Policy will require progress toward the forthcoming Housing Strategy by the States to give the Authority clear direction on the required level of Affordable Housing over at least a 5 year

[9] Billet D'Etat XXV & XXVII P.2016/25 Amdt 2 Proposed by Deputy P Roffey, Seconded by Deputy Laurie Queripel

period and the proportion required from private market development sites to contribute, and further guidance on the types of housing required.

The C*f*E&SS note that "it is essential that the Committee works with the DPA to scope the future affordable housing requirements so this can be fed into the 5 year IDP housing land supply review". The Committee has made progress through the merging of Housing's and the GHA's social rental waiting and transfer lists which provides much more accurate data on the Island's social rental requirements by number and by bedroom size. In addition, the Committee has progressed work on reviewing the Island's social housing stock to determine exactly what sized properties existing tenants and waiting list applicants require now and in the future. The Committee hopes that "during 2019 more sophisticated modelling will be developed so that the Island's affordable housing requirements for the short/medium term can be more accurately determined and updated on a rolling basis".

In terms of any behavioural distortion in applications, there have been very few sites large enough for 20 dwellings that have reached application stage. A number of larger sites with approved Development Frameworks are now likely to come forward and therefore Policy GP11 may deliver some Affordable Housing in the next year. The Planning Service would address any attempts to 'split' a site for example to avoid the requirement for Affordable Housing; potentially through a Development Framework addressing a wider site and requiring individual parcels within the site to contribute a portion of the overall requirement for Affordable Housing. IDP Policy GP10 gives weight to this by requiring comprehensive development and the efficient and effective use of land. This issue will be kept under review in future monitoring.

The C*f*E&SS note that while Policy GP11 is designed to ensure that the development of a site is still viable under its application, "without further dialogue with landowners and developers it is unclear exactly why larger sites are not being put forward for development. This is an area the Committee would be interested in considering further with the Development & Planning Authority (DPA) and it supports any workstreams that link in to this area".

2017 AMR Action Update – the 2017 AMR included an action for the *Development & Planning Authority to regularly liaise with the Committee for Employment & Social Security at an officer and political level to update on progress with the larger housing sites*. Although no larger sites have yet come forward, this action is carried forward in light of the comments from the C*f*E&SS.

During the Public Inquiry into the draft IDP there were a large number of representations from the property industry regarding the potential impact of the Affordable Housing policy on the viability of development. This will be kept under review if and when there are planning applications determined with a Policy GP11 requirement for Affordable Housing and viability appraisals are submitted in support of reduced provision. Likewise there have been no planning covenants in relation to Affordable Housing under the policies of the IDP. The experience of working on these can be considered in future AMRs. The C*f*E&SS notes that "initial discussions have taken place with landowners of sites meeting the Policy's criteria, and preparatory work commenced enabling these developments to be progressed,

but as yet these sites have not completed the planning process. The foundation discussions that have been had with landowners as a result of Policy GP11 have been productive and without issue, but it is hard to comment on the operational effectiveness any further until the Policy is progressed through to implementation".

During the debate on the IDP, the States resolved[10] to direct the Authority, in consultation with the C*f*E&SS and the C*f*E&I, to examine the case for an alternative requirement for developers to make a tariff payment equivalent to the value of the land which Policy GP11 would require to be set aside for Affordable Housing. The resolution directed the Authority to submit a policy letter on this matter by April 2017. This Policy Letter has been on hold due to the impact of the States' decision to increase the threshold to 20 units referred to above and also in anticipation of further work on the Housing Strategy. A further update shall be provided in future monitoring. The C*f*E&SS comment that as part of the IDP's 5 year review, the Committee would be interested in working with the Authority to consider further the implementation of a tariff in lieu of Affordable Housing for smaller sites that come forward for development. It appears to the Committee that "a number of sites are being developed but all so far have fallen under the 20 unit threshold and for this reason the Committee, to date, has seen no gain for affordable housing provision. The Committee fully supports the aim of Policy GP11 but feels that its threshold of 20 units in the absence of any other tariff has proven difficult to meet the Policy's sentiment of providing additional units of affordable housing to meet the Island's requirements".

The Committee *for* Health & Social Care (C*f*H&SC) has emphasised that there is an increased need for accommodation for essential workers, especially for couples and families. The resolutions to the C*f*E&I Policy Letter 'Local Market Housing Review and Development of Future Strategy' includes a workstream to analyse Key Worker housing (which is a type of Affordable Housing) requirements including establishing up-to-date definitions and analysis of costs and benefits of provision before developing a Key Worker Strategy. The C*f*H&SC note that it is keen to work closely with the Authority and C*f*E&SS to "scope the options available to meet future requirements and ensure that this is fed into the five-year IDP land supply review". The IDP policies allow for the provision of this type of Affordable Housing and are therefore effective for provision of Key Worker Housing. If specific targets are established through the workstreams this can also be kept under review in future monitoring. The C*f*E&SS notes that it has taken time to secure the resources to progress the Strategy but comments that it is "hoped that a more detailed and positive update can be provide as part of the next Annual Monitoring Report".

Lifetime Homes and Elderly Tenures

'Lifetime Homes' are ordinary homes that are designed to incorporate certain design criteria from the outset which can address the requirements of disabled residents or support the changing needs of occupants as they age and are designed from the outset to be easily adaptable in the future. If this approach is taken it will reduce the need for future home adaptations and give greater choice to disabled people and older people who may not achieve independent living due to an unavailability of suitable housing.

[10] Billet d'État XXV & XXVII P.2016/25 Amdt 8 Proposed by Deputy M Dorey, Seconded by Deputy M Fallaize

2 MONITORING POLICY PERFORMANCE - HOUSING

One of the core objectives of the SLUP is to enable people to help themselves become independent where possible. The SLUP highlights that Guernsey's population is ageing and the number of people of non-working age as a proportion of the population is projected to increase. SLUP Policy LP5 requires the IDP to provide new housing to a standard that will offer flexible accommodation that can be easily modified to meet the changing requirements of the householder.

To help deliver SLUP Policy LP5, IDP Policy GP8: Design expects proposals to demonstrate accessibility to and within a building for people of all ages and abilities; and, with regard to residential development, offers flexible and adaptable accommodation that is able to respond to people's needs over time. This approach helps to implement some of the land planning aspects of the Supported Living and Ageing Well Strategy (SLAWS) which was approved by the States in 2016 and is a States priority in the Future Guernsey Plan. The SLAWS states that "efforts must… be taken to 'future-proof' the Islands' housing stock, by ensuring that new builds and housing undergoing renovation meet basic standards".

Policy GP8: Design expects proposals for new residential development to demonstrate that dwellings have been designed, particularly in relation to their basic fabric (such as doors and hall widths, communal stairs and lifts etc.) and access arrangements, to take account of the requirements of disabled residents and the needs of occupants as they age. Policy GP8 refers to a number of issues that can be assessed for future AMRs, such as:

- Car parking (particularly the width of spaces or capacity to widen in the future, to make getting into and out of the vehicle as convenient as possible for the widest range of people including those with reduced mobility and/or those with children;
- The approach to a dwelling from the parking area (distance, gradients and widths);
- Entrances to buildings (provision of ramps or capacity to include in the future); and,
- The design and layout of new build residential units.

It is not clear at present if Policy GP8 is sufficient to deliver a higher level of accessibility than the minimum requirement of Guernsey's Building Regulations. This issue will be monitored through the assessment of indicators of the quality of new development in future monitoring as outlined in the Built Heritage and New Development thematic report. This will allow for a review of the effectiveness of IDP policies in delivering the SLUP requirement to enable people to 'age in their own homes'. Over 2018, the methodology and indicators have been drafted, which has become known as Design Quality Indicators (DQIs). Consultation with key stakeholders is expected to occur in 2019.

In endorsing the 'Programme of Works' set out in the 'Local Market Housing Review and Development of Future Housing Strategy' Policy Letter in July 2018, the States endorsed a work stream to produce an Elderly Tenure Strategy including an assessment of specialised housing and extra care housing requirements. The C*f*E&I comment that "progress on a number of these work streams will help inform the development of a revised Housing Strategy for Guernsey, which is critical to the future vision, direction and objectives of Housing". The KPMG report confirmed that Guernsey's demographic projections indicate a rapid increase in the number of people aged over 65 in the coming years. It notes that currently, only 2% of over-55s live in dedicated over-55s housing, and that over-55s could free up larger homes and reduce under occupancy of Guernsey's housing, by moving to

dedicated over 55s accommodation. The Elderly Tenure Strategy will consider if there is a need for further research to understand whether the issue is the market failing to provide sufficient accommodation for over-55s, or rather, a mismatch of housing stock problem, 'blocking' moves in the private market. A Policy Letter from the Policy & Resources Committee 'Policy & Resource Plan – 2018 Review and 2019 Updates' will be debated by the States in June 2019. The Policy Letter states that "this Work Package will link closely with the Supported Living and Ageing Well Strategy, Disability, Equality and Inclusion Priority Area and the Joint Strategic Needs Assessment for Older People".

The Authority has a role in the workstream and it will be important for the Authority to liaise at an officer and political level with C*f*E&I, C*f*E&SS and C*f*H&SC in order to ensure that the IDP policies remain effective in delivering the land use aspects of elderly tenure housing.

The P&RC in its response to the consultation for the AMR query if the IDP adequately supports "the provision of specialised housing, care facilities and housing accessible to the older population; and whether there are barriers to development which may be unnecessarily discouraging private sector development in this area". Specialised housing includes housing units with care provided to residents such as extra care accommodation, nursing and residential homes and other accommodation for people in need of care. There was no new specialised housing permitted in 2018, although permission was granted for works to 5 residential care homes including additional bedrooms in 1 case. There were no refusals of any applications for housing or accommodation of this type. The IDP supports the development of specialised housing through the policies for housing development. Proposals for accommodation for high dependency care may fall to be considered under the Social and Community policies of the IDP (as a 'health' use rather than residential) which also provide support for this use. In both cases the policies are guided by the SLUP and the spatial strategy and generally direct development toward the Main and Local Centres. No barriers to development of specialised housing have been identified.

Development Frameworks

A Development Framework (DF) provides broad but comprehensive guidance for specific large scale or complex development sites on the basis of the policy principles set out in the IDP. It should be noted that DFs are not required only for potential housing sites but also for some strategic development and Regeneration Areas. DFs are required for housing development within Main Centres and Main Centre Outer Areas for proposals of 10 or more dwellings / sites over 0.25 hectares (1.5 vergées) and within Local Centres for proposals of 5 or more dwellings / sites over 0.125 hectares (0.75 vergées).

14 DFs have been published to date and there have been ongoing discussions around more than 10 other sites. 3 sites with approved Development Frameworks have planning permission and there are live planning applications on a further 2 sites. In future AMRs the relationship between the DFs and planning applications for the sites can be reviewed to assess the effectiveness of the DFs in delivering high quality development.

There is a potential for a higher proportion of approved housing development to be in Main and Local Centres in 2019 once these DFs have been approved and associated permissions given.

A DF is an Authority document and must be approved by the Authority. However, the intention is that the process of producing DFs is collaborative and a party with an interest in a site / area can provide input to the DF process. This process has been evolving throughout 2017/2018. Once approved a DF forms Supplementary Planning Guidance to be taken into account when planning applications for the site are considered.

Key stakeholders are consulted as part of producing DFs depending on the issues with the site and they are then published for public comment and any views are taken into account prior to adoption.

The DF process has required considerable resources within the Planning Service and as such a degree of prioritisation has been required. The Planning Service has been prioritising DFs for Housing Allocations.

Feedback on Development Frameworks

As part of the consultation for the AMR, feedback was received from a number of sources on Development Frameworks. The STSB comment that "Property Services are also working with the DPA on a number of Development frameworks, funded by Property Services. The intention of these Development Frameworks are to "de-risk" a site in development terms for any future developer. Unfortunately, these frameworks are taking a long time to complete, resulting in a delay of these sites being offered to the market".

The time taken to produce DFs was also an issue of concern for the Guernsey Society of Architects (GSA). They comment that "the timescales are excessive and, in some cases, deter both private clients and commercial developers from considering development".

Comment from the GSA and from within the Planning Service as to the reasons for any delays has focussed on the threshold for DFs. The GSA consider that "the threshold that applies to the requirement for a Development Framework should be reconsidered" and "with the threshold set so low, it means more Development Frameworks are required which unnecessarily absorbs the Planning Department's [sic] time and… causes unreasonable delays".

The threshold for a DF in a Local Centre in particular has been perceived as being too low where a DF can add little value as the time and resources being spent on them do not seem to be resulting in proportionate benefits.

Development Frameworks: Conclusions and Action

2017 AMR Action Update – the 2017 AMR had an action that guidance is needed for agents and those working collaboratively on the production of Development Frameworks on the standard that is required. A Planning Advice Note 'Development Frameworks: A Guide for Landowners, Developers and their Agents' was published in October 2018; it is available here: https://www.gov.gg/developmentframeworks. This document has since been used by a number of agents to progress work on Development Frameworks with less input required from the Planning Service.

There are a number of DFs now approved by the Authority that provide agents with a template and will enable them to work in a proactive manner.

The benefit of a DF when complete is significant and in some cases the process has replaced the requirement for a more costly and complex Local Planning Brief and Planning Inquiry that would have been required under previous development plans. A DF provides clear guidance that would otherwise involve protracted pre-application discussions to replicate. A DF also provides certainty and clarity for potential investors, an opportunity for public views to be heard and taken into consideration at an early stage, and ensures efficient use of land by combining areas which previously would have been planned in a piecemeal manner.

2017 AMR Action Update – the 2017 AMR included an action for a review of the impacts of the thresholds for Development Frameworks in future AMRs. Notwithstanding that there is no evidence that the lack of a DF has been a barrier to significant development, the Authority acknowledges that some DFs have taken longer than was ideal and that some sites have benefited more from DFs than others. The Authority considers that while a DF is a valuable and powerful tool it recognises that amendment to the threshold for DFs may be required. This will be taken into account in the 5 year review of housing land supply, allowing for more time for procedures to become fully bedded in and for further best practice to emerge.

In the meantime, with the benefit of the guidance, a proportionate approach can be taken where a DF is required so that the DFs for relatively straightforward sites can be progressed more quickly and the opportunity exists for agents to produce Frameworks at their own pace, with a quicker turn around by the Planning Service if the work is to the required standard. In future, as with the English & Guernsey Arms DF, the Planning Service may choose to undertake the work itself, rather than to attempt collaborative working, for some DFs to reduce delays.

While some DFs for smaller sites may not have added significant value, it is also evident that some larger or more complex sites where a DF was not required by policy would have benefited from a DF. In some cases at the planning application stage insufficient information was provided or the proposal had not taken all policy issues into account creating delays in the processing and determining of the applications and leading to additional costs to the developer, land owner and Authority when amendments to the proposals are required.

In considering any revision to the thresholds for a DF, the Authority is mindful of the fact that the size of a site or the number of dwellings are not the only issues that affect the complexity of a site and situations where a DF would be beneficial.

The issue of resources available within the Planning Service to progress significant DFs to bring forward beneficial development potential in Regeneration Areas and for work on any Local Planning Briefs is being explored.

Conversion of Redundant Buildings

IDP Policy GP16(A): Conversion of Redundant Buildings supports conversion of sound and substantial buildings, that are no longer required or capable of being used for their current or last known purpose, to a range of potential new uses. Policy GP16(B): Conversion of Redundant Buildings - Demolition and Redevelopment supports this where approval has been granted under Policy GP16(A), under certain circumstances.

The IDP policies for the re-use of redundant buildings provide a positive and pragmatic approach to the reuse of existing substantial and structurally sound buildings making the most effective use of brownfield sites and redundant buildings which contributes to the IDP Objective to make the most efficient and effective use of land. Proposals to convert buildings are most commonly for residential use Outside of the Centres. There were 16 planning permissions in 2018 for conversion of a redundant building to residential use Outside of the Centres and 6 refusals. These were refused for a variety of reasons including in some cases where the redundant building is small and the scale of extension proposed would not represent a modest extension and would form a significant part of the new unit which in effect is tantamount to the construction of a new dwelling Outside of the Centres which is not supported by IDP Policy OC1 Housing Outside of the Centres.

This demonstrates that the policies are effective in providing for the re-purposing of existing buildings whilst meeting the SLUP requirement to concentrate development in the Main Centres.

2017 AMR Action Update – the 2017 AMR included an action for the *Planning Service to consider issuing guidance on the interpretation of Policies GP16(A) and GP16(B) in the future*. Having given this due consideration, the Authority is of the view that this guidance is not required. Since the publication of the 2017 AMR, the Planning Service has continued to use internal mechanisms for peer review and discussion in order to ensure consistent policy interpretation. Advice can be provided to prospective applicants through the pre-application process.

In addition, in response to queries regarding an appropriate minimum floorspace for a dwelling, including those created through conversion of a redundant building, the Service now makes reference to the Department for Communities & Local Government document 'Technical housing standards - nationally described space standard' which deals with internal space within new dwellings. The standard does not apply specifically in Guernsey but represents current best practice and is therefore referred to as guidance for new housing in Guernsey under the policies of the IDP.

Summary

In summary, the IDP policies have been effective in meeting the requirements of the SLUP for a 2 year pipeline supply of housing permissions and a 5 year supply of housing land. Both are in excess of the requirement, taking into account the change to the Strategic Housing Indicator.

The policies have also been effective in concentrating housing development in the Main Centres - the majority of residential developments in the pipeline are located in the Main

Centres [68%] as were the majority of approvals in 2018 [58%] – and this supports delivery of the Spatial Strategy. The majority of permissions have been for smaller sites (1-5 dwellings), with a notably low number of permissions in Local Centres to date.

There has been relatively slow progress with delivery of larger housing sites including a number of housing allocation sites. This may be in part due to economic conditions. This has resulted in no sites to date having a requirement for Affordable Housing under Policy GP11. There has however been a number of planning permissions for the Guernsey Housing Association for Affordable Housing. Going forward, the Authority will regularly liaise with the C*f*E&SS to update on progress with the larger housing sites at an officer and political level. No blockages to delivery have been identified to date but this will be kept under review.

There is a need for robust monitoring and data collection for housing policies to be fully effective. Accurate, robust and real-time data will be essential in order to be able to ensure that new housing is reflective of the demographic profile of households requiring housing at any one time in accordance with the housing policies of the IDP. Joint working between the C*f*E&I, the Authority and the C*f*E&SS is key to achieving this.

Summary of action required

- Joint working between the Development & Planning Authority, the Committee *for* Employment & Social Security (whose mandate includes delivery of Affordable Housing), the Committee *for the* Environment & Infrastructure and the Policy & Resources Committee in order to implement the 'Programme of Works' endorsed by the States following the debate of the Policy Letter 'Local Market Housing Review and Development of Future Housing Strategy' in July 2018, particularly in relation to the monitoring of housing supply and need and the establishment of an appropriate data collection model and data collection processes; and,
- The Development & Planning Authority to regularly liaise with the Committee *for* Employment & Social Security at an officer and political level to update on progress with the larger housing sites.

Offices

Introduction

The Island Development Plan (IDP) has an objective to 'support a thriving economy'. The Plan makes provision for a range of new employment developments throughout the Island where they make a positive contribution to the sustainability of a strong local economy.

This report will consider the policies that cover offices (use classes 15, 16 and 17) including homebased employment (use class 5). The report will seek to highlight any blockages to the delivery of office development in relation to the IDP policies.

Policy Context

The Strategic Land Use Plan (SLUP) directs that office uses should be focused within and around the Main Centres with some limited development within the Local Centres to contribute to their range of services and facilities and reinforce them as sustainable centres. Outside of the Centres, the SLUP directs the IDP to make provision for certain small-scale businesses, who have a justifiable need to be located Outside of the Centres based on the nature of operation or have difficulty in finding a suitable site within the Centres.

The SLUP identifies that the office sectors requirements can be met through a combination of what it terms primary offices (including large floorplate) on new sites focussed in the Main Centres and at Admiral Park, together with the refurbishment and redevelopment of older office stock to create modern offices.

To reflect the strategic direction of the SLUP, the IDP's approach to office use is to focus this use in the Main Centres, where there are existing clusters of offices, while recognising the need for large floorplate office space with the allocation of an Office Expansion Area at Admiral Park (for floorplates over 1000m^2). The IDP also seeks to retain existing offices in Main Centres but allows for smaller premises under 250m^2 to change to alternate suitable use, to provide flexibility and to address an oversupply of, mainly tertiary, small office space. The change of use of larger substandard office premises to other uses, subject to demonstrating certain criteria, can be considered under the IDP policies. New offices and changes to existing offices are also supported in Local Centres where they are of an appropriate scale for the Local Centre concerned and where scale and cumulative impact would not undermine the vitality and viability of the Main Centres. Outside of the Centres, new office development is supported through conversion of redundant buildings only.

The Economic Development Strategy, 2018

The States' approved Economic Development Strategy[1] is to deliver a strong, sustainable and growing economy and seeks to achieve growth in the economy by focusing on four core areas:

- Building on what we do well now (**maintain**);

[1] Billet D'État XVIII 2018

- Achieving diversification into new areas of economic activity to secure long-term prosperity (**diversify and grow**);
- Reaffirming that Guernsey is open for business through the actions we take (**open for business**); and,
- More active monitoring and reporting on our economy, and use those insights to inform our actions (**monitoring the economy**).

The strategy has identified key areas of work under each of these core headings, which the States hopes to pursue through the Committee *for* Economic Development (C*f*ED) working alongside other States Committees and with external partners. Of particular interest is the development of monitoring and reporting on our economy and whether any changes or additions to data collection and monitoring of land use and reporting by the Authority could help or support this work or whether the data collected by C*f*ED could inform future AMRs. In November 2018, the projects identified within the approved Strategy were assigned differing levels of priority according to the categories of "critical", "important" and "beneficial". The C*f*ED has highlighted in its response to consultation on monitoring this year that this will impact upon its ability to carry out work in certain areas, including the collation of data for IDP monitoring purposes.

2017 AMR Action Update – the 2017 AMR included an action for the Development & Planning Authority to liaise with the Committee *for* Economic Development and Policy & Resources Committee at an officer level in order to support further work that may arise from implementing the recently approved States Economic Development Strategy, particularly on the monitoring of our economy. Productive discussions at officer level have taken place and it is recommended this should continue when time and resources allow, according to the agreed prioritisation of work.

Background to the office market

Guernsey's finance sector is the central pillar of Guernsey's economy. This sector together with the supporting business services and legal sectors account for a quarter of all employment and contribute in the region of £1.3bn to the economy, equating to c.44% of the Island's economic output [source: Guernsey Facts & Figures, 2018]. These sectors are therefore the key driver for office accommodation on the Island. Although the business services sector has experienced steady growth over the last 6 years, the finance sector has faced testing economic conditions in recent years. The 2008 global financial crisis has been followed by hostility in certain quarters to finance in general and offshore finance in particular. Over the last 6 years, finance sector output has broadly stabilised. It is indicated in the Economic Development Strategy 2018 that there is broad recognition within the industry, that a more strategic approach is needed and efforts need to be made to 'reboot' growth where immediate opportunities can be identified.

In projecting demand for offices in the future, the Employment Land Study (ELS) 2014 (reporting baseline 2012) found that there will be a continued and growing demand for offices over the life of the IDP equating to an additional 30,000m^2. In response, the IDP designated c.3 hectares of land adjoining the existing office cluster at Admiral Park as an Office Expansion Area to accommodate the majority of the identified requirement for new offices.

The ELS 2014 assessed the existing office stock and recommended a portfolio of core locations for office premises over the Plan Period as set out in Figure 1 below:

Proposed portfolio of office sites		
Area category	**Area name**	**Quality of office space**
Mixed-use historic areas	Kingsway House	Primary
	St Peter Port & St John House	Primary
	Grange Road	Primary
	Town Centre	Primary
	La Charroterie	Primary/Secondary
	South Esplanade	Secondary
Established offices	Les Echelons	Primary
	Glategny Esplanade	Primary
	Le Truchot	Primary/Secondary
Business Parks	Admiral Park	Primary

Figure 1: Core locations for office premises

As part of the qualitative and quantitative research for the Annual Monitoring Report (AMR), the Planning Service has updated the findings of the ELS 2014 by reviewing the changes over the last 6 years to the profile of existing accommodation and the recommended portfolio. The detail of these changes is provided in the 2018 Update Report to the ELS. It is intended to publish an annual update report to the ELS, with a more comprehensive review when the IDP reaches its halfway point (5 years). The summary of the changes between 2012 and 2018 are set out below:

- 246,944m^2 office accommodation in 350 premises, located on 171,447m^2 of land. This represents approx. 9.29% decrease in office accommodation since 2012;
- Majority of premises are under 250m^2 (53%). This represents a 7% increase from 2012. The number of premises over 3000m^2 has decreased since 2012 but still represent 38% of accommodation;
- Majority of office accommodation remains located in St Peter Port (70.4%), with minor concentration in the Bridge;
- Business Services sector continues to grow, while finance sector is broadly stable over last 6 years;
- Slight increase in office vacancy rates in 2018 - 12% compared to 11.1% of stock in 2014 and 10.6% in 2017;
- Noticeable increase in take-up of offices premises from the market during 2014 (6.3%), 2016 (11%) and 2017 (6.5%), especially smaller units (<250m^2) in 2016/2017. This trend continued in 2018 with 5.1% take up rate;
- Of the stock available to the market, similar to 2012, the majority to let is under 250m^2 but there is noticeable decrease in the availability of larger scale units (>3,000m^2) and units between 250-500m^2. 44% of the stock available to the market has been marketed for more than a year;
- Supply of offices through the planning system over last 6 years amounts to c.15,500m^2 (including a reduced provision of 12,000m^2 for the site at Admiral Park);
- Key office requirements remain similar: locations within or around existing office clusters, with good access to parking and flexibility to accommodate changing requirements. New office space needs to have built-in flexibility to accommodate a company's changing needs

and changes in technology. In new developments and refurbishments, there is now a greater emphasis on the provision of facilities for the health and wellbeing of staff. Unlike other jurisdictions, green credentials remain on the wish list in Guernsey due to the lack of choice;

- Overall it is noted that given the level of uncertainty around Brexit, it is difficult to predict the future requirements for office space. In the short to medium term, research indicates a requirement for additional large floor plate high quality office accommodation, with longer term future demand more focused on small to medium businesses (which is happening now) requiring high quality small office spaces with greater emphasis on staff facilities in prime locations. This is likely to be driven by changes in working practices enabled by technology, but also by high net worth individuals. Going forward, agile working and improvements in technology may reduce the overall demand for new space. Technology is also changing the physical requirements for office accommodation e.g. wireless technology is removing the requirement for raised access flooring for data cabling;
- Overall, there is a need to provide a range of different size and quality of accommodation within the portfolio to meet different business needs (from high net worth individuals, business support, start-ups, to global firms).

The full 2018 ELS Update Report can be downloaded from the States website (www.gov.vv/planningpolicy).

As part of this work, on 5th March 2019, the Planning Service together with Business Innovation & Skills hosted a workshop with representatives from commercial agents and commercial organisations on Island, to gain qualitative feedback on the performance and effectiveness of the IDP policies relating to the office, industry and storage/distribution sectors. The workshop examined the current data on these sectors and discussed the drivers behind the changes and trends as well as appropriateness of the employment land portfolio. In addition, in response to an AMR 2017 action, the workshop also focussed on the quality of offices within Guernsey and the potential application of quality criteria to assess the portfolio. The feedback received from the Agents is fully incorporated into the 2018 Update Report on the ELS and is referred to in this report as appropriate.

2017 AMR Action Update - the 2017 AMR included an action for the Development & Planning Authority to liaise with the Committee *for* Economic Development to engage with industry representatives on definitions of primary, secondary and tertiary accommodation and the criteria for assessment of quality and use in future analysis. The joint workshop held in March 2019 provided feedback from the industry on the definitions for primary, secondary and tertiary together with potential criteria that may be appropriate for assessment of the quality of offices in Guernsey. This is set out in full in the ELS Annual Update 2018 and discussed in further detail in the section entitled 'overall supply of office accommodation' below.

Planning Permissions in 2018

During 2018 a total of 22 planning applications were received relating to offices. Of the 22 applications, 19 were granted planning permission and the remaining 3 applications were refused.

Of the 19 applications that were granted planning permission, 5 proposals resulted in the loss of office accommodation to other uses. The majority of these losses related to units

under 250m^2. In addition, 1 proposal that received planning permission represented a substantial reduction in the planned office development at Admiral Park within the Office Expansion Area (-1,800m^2). The breakdown of these uses is shown in Figure 2 below.

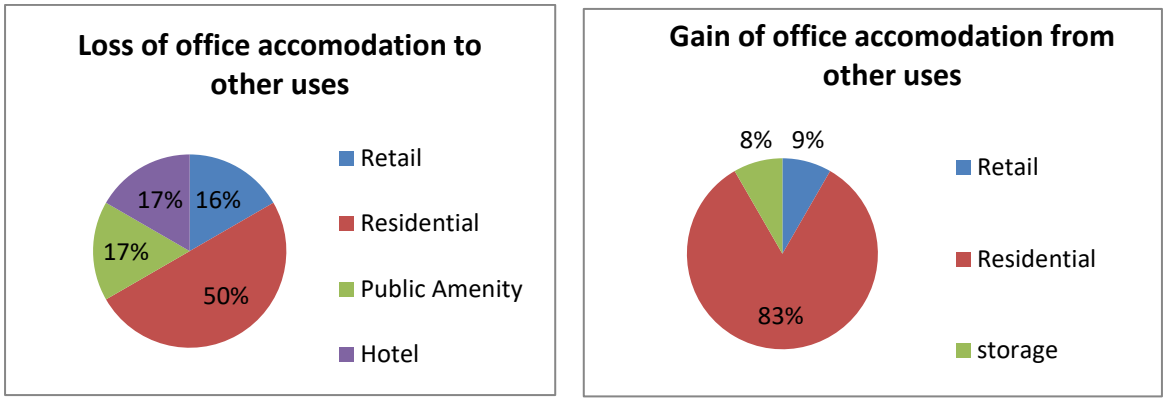

Figure 2 and 3: Breakdown in the number of applications for change of use from / to office accommodation during 2018

3 of the 19 planning applications approved, provide additional office accommodation through the change of use of existing premises from other uses, concerning the change of use of existing 'small-scale' units (i.e. below 250m^2) within St Peter Port Main Centre or home based employment. 9 applications were approved for home based employment, 2 located within the Main Centres and the remaining located Outside of the Centres. A full breakdown of the range of uses compared with the percentage gain from that use is shown in Figure 3 above.

One planning application granted planning permission provided additional ancillary parking provision and additional staff facilities for an existing office within St Peter Port Main Centre.

No new purpose-built office accommodation was approved as part of the proposals that included office floor space. Overall, although the planning applications approved during 2018 resulted in increase of office floor space, it is important to note that the permissions granted represent a reduction in the planned supply at the Admiral Park site. The location of the applications can be seen in Figure 5 below.

Of the 3 applications refused planning permission, two related to the change of use from offices to residential for the same small scale unit in St Peter Port Main Centre. Both of these applications were considered to comply with Policy MC4 (A) but were refused because the resulting residential accommodation would be substandard in the opinion of the Authority. An appeal was lodged against the decision of the Authority[2]. The other application was refused planning permission to change use from residential to office use on a site Outside of the Centres as the loss of the existing residential unit would be contrary to Policy GP12: Protection of Housing Stock. Of interest, no applications during 2018 related to sites within Local Centres.

[2] It is noted that the Appeals Panel have subsequently decided to overturn this decision and grant permission. The impact of this decision will be reported on in further monitoring.

Use Class / Location	Financial & professional office (15)	Administrative office (16)	Temporary office (17)	TOTAL
Main Centres	-130	8524		**8394**
Local Centres	0	0		**0**
Outside of the Centres	0	0		**0**
TOTAL	**-130**	**8524**		**8394**

Figure 4: Net change in floor space (m^2) by Use Class granted planning consent during 2018

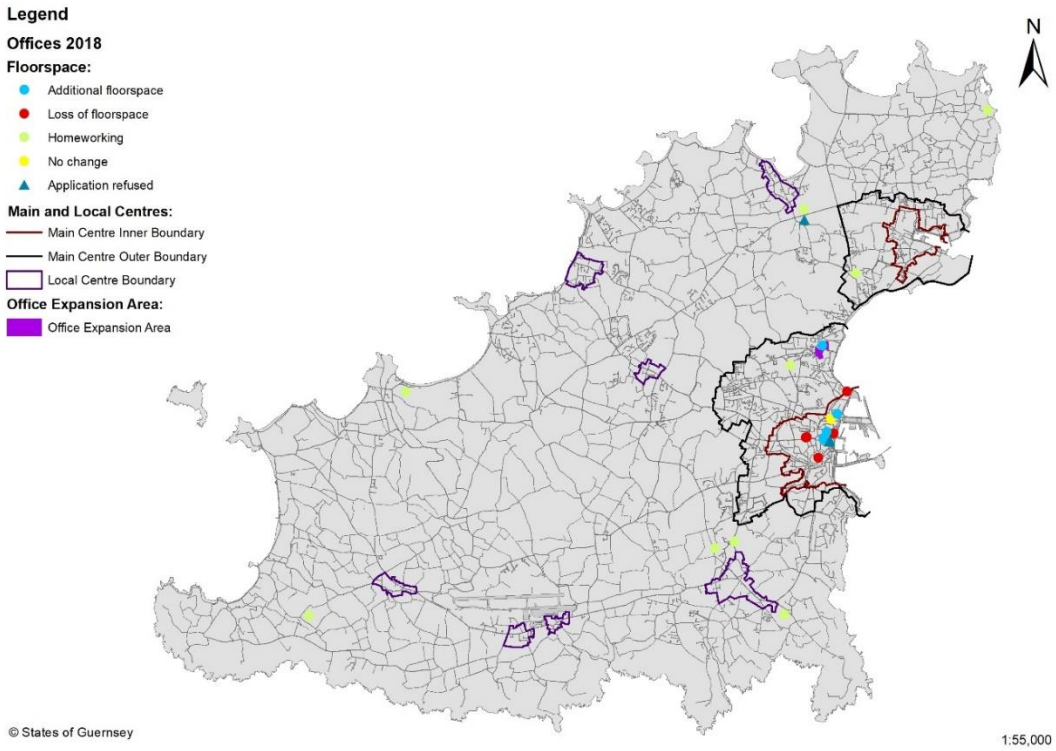

Figure 5: Planning Applications for offices during 2018

Performance of Policy

Office Expansion Area

A proposal was submitted during 2018 seeking revisions to the extant outline planning permission (Ref OP/2016/0796) granted in 2015 which covers half of the designated Office Expansion Area land and provides for mixed use development comprising 13,800m^2 office accommodation together with some other complementary uses. The revisions involved increasing the floor area for the hotel use and a corresponding decrease for all other approved uses. For offices this translated into a significant reduction of 1,800m^2. This planning application is reflective of the transition between two Development Plans, as the

Outline Permission was granted under the policies of the former Development Plan, the Urban Area Plan 2002. The revised proposal follows the principles in the extant Outline Permission. Details to comply with conditions attached to this permission must be submitted and approved by the Authority and substantial works commenced by August 2019 or the permission will expire.

If the existing permission expires, a Development Framework will be required to be prepared to comprehensively guide development of the whole of the Office Expansion Area. This may impact on the delivery of allocated employment land within the shorter term.

2017 AMR Action Update - key to the approach taken by the IDP towards meeting the requirements of the office sector is the delivery of the Office Expansion Area. The 2017 AMR included actions for the 2018 AMR to review the need to prepare a Development Framework for this area if the current planning permission lapses and to review the approach for delivering the requirements of the office sector if the extant planning permission for the Office Expansion Area is implemented. If the extant planning permission for the mixed use development is implemented this may have implications for the IDP approach towards meeting the requirements of the office sector. In light of the status of this site and outstanding requirements to discharge planning conditions and undertake substantial works prior to August 2019, the Development & Planning Authority will continue to monitor delivery of the office accommodation within the Office Expansion Area and review the need to prepare a Development Framework for the Office Expansion Area in 2019.

Main Centres

During 2018, like in 2017, it is notable there were no planning permissions for purpose built new office accommodation. All applications involved small scale units with the exception of the case highlighted above to amend a previously approved scheme in the Office Expansion Area. For the first time, the trends are showing a sustained decline in the supply of offices through the planning system, which has impacted on the recommended portfolio within the Main Centres. The review of the 2018 planning applications indicates flexibility between uses for small scale units within Main Centres, changing largely between office, retail and residential uses to respond to market needs, as the policy intends, in order to support the vitality and viability of the Main Centres.

2 planning applications involving the loss of small scale office accommodation were refused permission to change use to residential accommodation on grounds relating to future amenity.

Main Centre Outer Areas

There were no planning applications relating to office use within the Main Centre Outer Areas of either Town or the Bridge. The policy is therefore untested and cannot be assessed further at this stage.

Local Centres

Although there were no planning applications for office uses within Local Centres during 2018, last year's review indicated that policies for the provision of employment uses within

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Local Centres are performing as intended, reusing existing employment space to maintain their range of services and facilities and reinforce them as sustainable centres. There is no evidence to indicate this position has changed in 2018.

Outside of the Centres

During 2018, proposals relating to office use located Outside of the Centres all related to new home-based employment (Residential Use Class 5).

Minor Departures

Like last year, 1 planning application resulted in the loss of primary office accommodation to a training facility within the St Peter Port Main Centre contrary to Policy MC4 (A). The proposal related to an extension of a business intrinsically tied to the financial sector, with an essential requirement to be located in close proximity to the existing financial core. The nature of the business also requires office-type accommodation, in a high profile building, to meet the requirements of national accreditation bodies. In this case, the extension, like the original permission last year, would involve alterations that would be easily reversible and would not preclude future use of the premises for office use. Like last year, it was demonstrated that there is little availability in the market to cater for the proposed business.

In light of the above, it was considered that the intended use would not have a significant impact on office stock and could therefore be considered as a minor departure from the Development Plan under section 12(2) of the Land Planning and Development (General Provisions) Ordinance, 2007. The use was limited to the operations of the applicant's business only, as set out within the planning application, and that when the business ceases to operate from the site the use would revert to general office use.

Last year this proposal raised the issue of the potential changing nature of some business and the increasing blurred lines between uses. Agent feedback continues to seek a change to policy or the use classes to recognise the changing nature of businesses requiring office accommodation. The Authority considers the likely occurrence of these cases arising in the future is limited and the 2018 planning application was an extension of the business granted permission last year rather than a new use. No other cases have come forward. There is no evidence of need, at this stage, to change the policy or the legislation i.e. these cases are the exception rather than the norm. This case has demonstrated that there is flexibility within the planning legislation to consider, exceptionally, minor departures from the IDP in specific circumstances.

2017 AMR Action Update – monitoring has not indicated any requirement to change the policy or legislation at this stage. The action to monitor this issue is carried forward as: Continue to monitor the number of cases where applications for a use similar to office use are permitted as a minor departure to the IDP policies, reflecting the changing nature of businesses requiring office accommodation. If this rises, the Development & Planning Authority will need to reconsider whether an amendment to policy is required.

Overall supply of office accommodation

Overall pipeline supply of office accommodation remains acceptable. As shown in Figure 6 below, the supply of offices in the past is erratic in nature, with significant gains linked to single large sites coming forward. Planning permission was granted during 2018 for a revised proposal at the Admiral Park site, reducing the level of office accommodation by 1,800m^2 from that previously approved. The nature and level of the current pipeline supply would now appear inconsistent with previous trends, showing for the first time a decline in office accommodation. A downward trend in supply of offices would run counter to the forecast requirements for additional office accommodation over the life of the IDP. Continued decline in the office accommodation, especially on sites identified for office expansion, would be of concern.

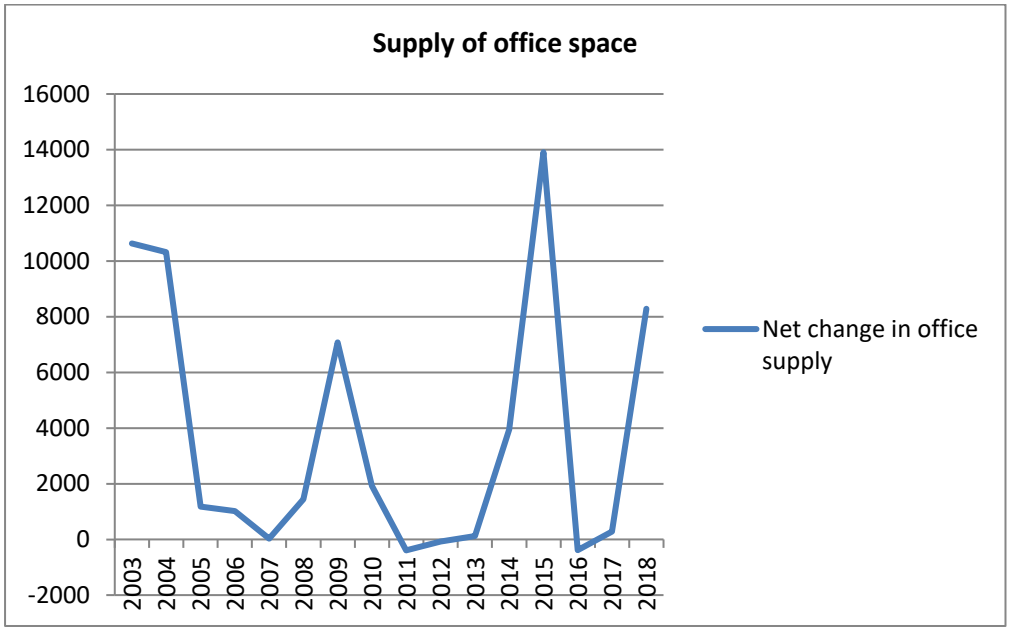


Figure 6: Supply of office accommodation through the planning system since 2003 (includes outline)

With a longer term aim to maintain an appropriate portfolio of office stock within the Main Centres and facilitating economic growth, it is notable there has been no significant delivery of additional office accommodation to the portfolio to date. Until the delivery of significant new primary office accommodation within the Office Expansion Area referred to above within the short to medium term, it is noted there is a current shortfall in large floorplate primary office accommodation.

In the medium to longer term, the IDP identifies the redevelopment of the Harbour Action Areas (HAAs) in Town and the Bridge together with the 4 identified Regeneration Areas as opportunities to deliver new primary office accommodation. Although land use policy makes provision for such development, the risk of any delay to these areas coming forward or not delivering significant levels of new office accommodation should be highlighted. The C*f*ED recognises that offices with sea views could be attractive to new businesses and existing firms that are looking to upgrade and relocate and would support the development of such accommodation.

2 MONITORING POLICY PERFORMANCE - OFFICES

The States' has identified the Eastern Seafront including the HAAs as one of its priorities and an Area of Focus in the Policy & Resource Plan. Political governance has been set up including the Development & Planning Authority, the Committee *for the* Environment & Infrastructure, Committee *for* Economic Development, the States Trading and Supervisory Board and Policy & Resources Committee. The group has named the project the Seafront Enhancement Area. Public consultation will form a significant part of the programme in advance of the formal consultation required for the Local Planning Brief for specific areas such as the HAAs. As noted in the Strategic Development and Infrastructure report, there will continue to be monitoring of the delivery of the Local Planning Brief/s and the Authority will seek to work with the relevant Committees to support the delivery of an appropriate mix of development.

Feedback from the agents and from the C*f*ED recognises that there needs to be a range of office accommodation to meet all business needs e.g. from start-ups to global corporation headquarters. The SLUP categorises office accommodation into 'primary', 'secondary' and 'tertiary' and requires planning policy to meet the demands for offices of modern standards by:

- the development of Primary offices including large floor plate buildings on new sites;
- the refurbishment or redevelopment of Secondary offices into Primary offices where feasible; and,
- the release of unsuitable Secondary and Tertiary offices for other uses.

The current planning polices reflect the direction of SLUP. However, industry feedback suggests that it may be impossible to upgrade secondary accommodation to primary quality due to a variety of factors. Given the general consensus about a need to provide a range of office accommodation, the apparent changes in ways of working so that there are demands for good quality smaller units and accepting there may be difficulties in upgrading some premises, there appears to be an inconsistency with the policy approach seeking accommodation to be upgraded to primary type where this is feasible. In its response, the C*f*ED agreed that there may now be an inconsistency in the policy approach worth exploring further.

To this end, industry has suggested a revised approach and criteria for determining the quality of offices in Guernsey. A detailed analysis of the existing stock within the Main Centres against the suggested quality criteria would give an agreed baseline on the range and quality of the existing stock however this approach should be further tested with other key stakeholders. Further analysis of whether this is an appropriate range of accommodation to meet business needs can then be undertaken with the C*f*ED. The results of C*f*ED's office survey undertaken in 2019 will be beneficial to this analysis. It is recommended that this approach is developed further in partnership with the industry. This research should then inform the 5 year review of employment land supply in 2021 and any requirement to amend planning policies.

Action - Development & Planning Authority to liaise with the Committee *for* Economic Development at officer level and commercial agents and industry representatives to a assess the recommended portfolio set out by the ELS (2014) together with other existing stock within the Main Centres against the criteria for quality. Further analysis of whether this is an

appropriate range of accommodation to meet business needs can then be undertaken with the Committee *for* Economic Development. This research should then inform the 5 year review of employment land supply and any requirement to amend planning policies.

Industry considers that there is surplus office stock which should be released to alternative uses. The C*f*ED also recognises that there is an excess in supply of poor quality office space no longer fit for purpose that could be converted to other uses, particularly residential, without having a significant impact on the health of the office stock. The C*f*ED therefore recommends that the IDP policies continue to ensure that flexibility exists to allow this to happen as smoothly as possible.

The loss of units, especially larger units over 1,000m^{2,} could significantly decrease the portfolio of stock if unmanaged. The current policies provide general support for retaining office accommodation that is capable of meeting modern requirements due to the importance of the finance sector to the Island economy yet recognises that some secondary and tertiary offices may be more appropriately used for other suitable uses, which support the vitality and viability of the Main Centres. Policy allows for the loss of such accommodation provided that it is demonstrated that it provides unsatisfactory accommodation, cannot easily be refurbished to meet modern standards and has been marketed unsuccessfully for 1 year, or provides accommodation less than 250m^2. The review of 2018 planning applications indicates the policy is performing as intended by allowing smaller offices to change use but retaining existing large floorplate primary office accommodation. While no cases have highlighted any blockage to the release of unsuitable accommodation to date, it is advisable that the extent of flexibility is reviewed following further analysis of the existing and recommended portfolio identified above and be considered as part of the 5 year review of employment land supply.

In addition, in light of the future requirements being driven by demand for small to medium sized units of high quality, the ELS 2018 report raises the question over whether size is the most appropriate criteria to be used to determine flexibility to change use or whether quality should be the key criteria to ensure retention of the most appropriate portfolio. In response to this issue, the C*f*ED feedback continues to support the current policy approach. However, the issue of size and prime quality offices needs to be explored to ensure that the IDP is striking an appropriate policy balance between enabling sufficient flexibility for change of use while also protecting good quality and prime office space. Following the further analysis outlined above, this matter should be considered as part of the 5 year review of employment land supply.

Industry feedback also highlighted the historic issue of residential units created as part of office developments during the ‘90s and early 2000s. The residential units were incorporated into office developments to fulfil policy requirements at that time. Over the years, in some instances, these residential units have either never been brought into use or have been underused out of preference by the businesses owning/occupying the office floor space. Industry has suggested that maximising the existing office stock potential by allowing the change of use of these units and incorporation into office floor space would have negligible impact on housing supply and would maximise office potential. However, that approach would result in a loss of housing units contrary to current planning policy (GP12:

Protection of Housing Stock). Changing this policy position could have wider impacts and would require further investigation and would need to be considered in light of the housing supply and future housing requirements, as part of the 5 year review.

INDICATOR – Supply of new office premises through the planning system		
Plan Objective		Plan Objective 3: Support a thriving economy.
Target		30,000m^2 additional office land over 10 years (from 2016).
Outcome	2018	Net gain of 8,394m2 of accommodation.
	2017	Net gain of 286m^2 of accommodation.
Target met?		No
Comments (including any risks to delivery)		During 2018 all proposals for new office accommodation involved small scale units (<250m^2) There were no medium (>500m^2 <1,000m^2) or large scale (>1,000m^2) proposals for new purpose-built office accommodation. The decline in supply of accommodation during 2018 is unusual. Although supply of employment space is often erratic, linked to the bringing forward of large sites, there is generally not a decline in supply of any significance. There is the potential for the delivery of significant office accommodation through extant permissions on the designated Office Expansion Area and no further reduction of office accommodation should be allowed on this site. In the medium to longer term, there is potential for delivery of office accommodation through development of the remainder of the Office Expansion Area, Regeneration Areas and Harbour Action Areas.
Action		Development & Planning Authority at an officer and political level to seek / encourage delivery of new high quality office accommodation in the development of the Office Expansion Area, Regeneration Areas and Harbour Action Areas that is adaptable to suit a range of businesses. Development & Planning Authority to continue to monitor delivery of the office accommodation within the Office Expansion Area and review the need to prepare a Development Framework for the Office Expansion Area in 2019. Monitor the changing nature of business and appropriateness of use classes and policy.

Availability of office accommodation

At the end of 2018, the vacancy rate for office stock stood at 12%. This represents a slight increase of 1.3% from the same time in 2017 and 0.9% when compared to the baseline in 2012. Notably the increase relates to accommodation available to let. The availability of offices to purchase compared to 2017 has nearly halved. Between 2012 -2017 there was a noticeable increase in take up of office premises from the market; during 2014 (6.3%), 2016 (11%) and 2017 (6.5%). There has been continued increase in take up of offices during

2018 (5.1%). Some of the activity was attributable to take up of a few larger premises towards the end of 2018.

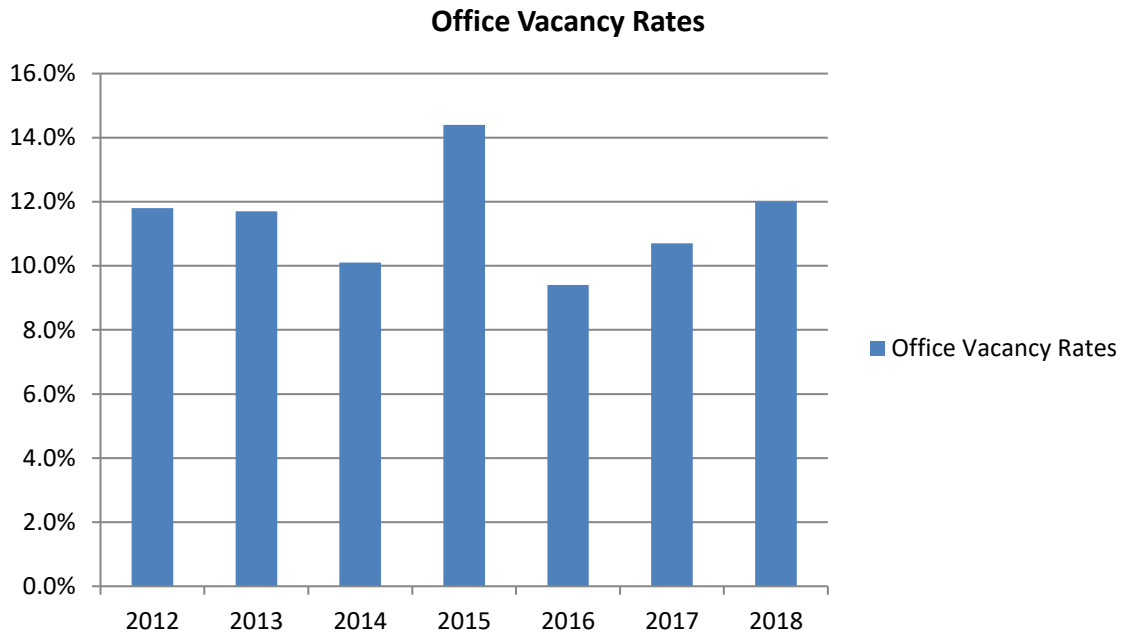


Figure 7: Percentage of office accommodation to let or sale since 2012

Overall, industry feedback indicates that 10% vacancy rates may still be an appropriate general indicator but there needs to be an appropriate range and choice of sizes available in the market at any given time to allow enough room for businesses to move and to facilitate growth. The current position is considered to be too tight in the market place given recent take up of some large scale units towards the end of 2018 (see Figure 8 below). There are no premises available over 3,000m^2, marked decrease in units between 1,000m^2- 3000m^2 and an indicated growing demand for high quality small to medium size accommodation (up to 500m^2) currently lacking in the existing portfolio. Industry considers meeting this demand is crucial for Guernsey's economy now and in the future.

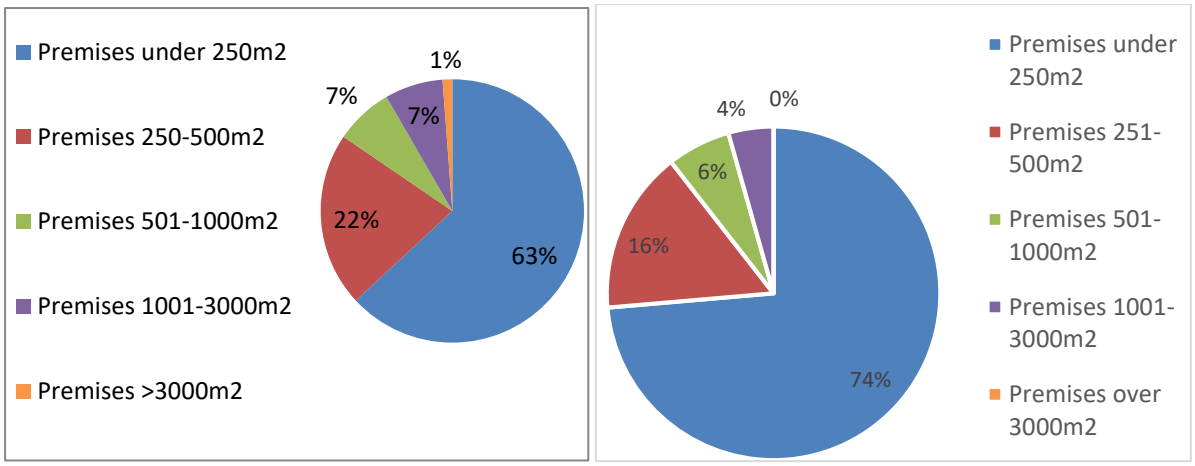


Figure 8: Offices available to let by size in 2012 and 2018

The data highlights the importance of delivering designated land at Admiral Park Office Expansion Area and the opportunities for significant additional floor space within the HAAs and identified Regeneration Areas.

2017 AMR Action Update – the 2017 AMR included an action to continue to monitor the supply of office premises bi-annually, this is carried out for the Q2 and Q4 IDP Quarterly Monitoring Reports each year.

INDICATOR – Office premises available to the market for let		
Plan Objective		Plan Objective 3: Support a thriving economy.
Target		Maintain a minimum 10% vacancy rate to provide headroom in the market with appropriate mix of sizes available.
Outcome	2018	12.0% Vacancy Rate.
	2017	10.7% Vacancy Rate.
Target met?		Yes.
Comments (including any risks to delivery)		
Action		None.

Specification & size of unit

Agents' feedback confirmed the key specification requirements for offices remain similar to that reported in 2017 with businesses seeking locations within or around existing office clusters, with good access to parking and flexibility to accommodate changing requirements. New office space needs to have built in flexibility to accommodate company's changing needs and changes in technology. Green credentials are factors considered by tenants but unfortunately are usually compromised in Guernsey due to the lack of choice or requirement to build to these standards. With Guernsey continuing to experience near full employment in 2018, the tight labour market is increasing the influence of factors that attract and retain staff.

Recent and planned refurbishments are changing the internal layout of premises with greater focus on staff areas and facilities for their health and wellbeing. Agents did highlight again the changing nature of the workforce, with increasing numbers working part-time making access to nearby parking more critical (e.g. the certainty a car parking space brings to people that they can arrive on time to start work and leave on time to do pickups from nursery etc). In relation to parking standards, the States did amend the maximum standards for parking in the Supplementary Planning Guidance to allow for additional parking associated with offices. The C*f*ED in its response indicated a desire to work with the DPA to look at all potential options for meeting the access and parking aspirations of office users, while also ensuring that this does not adversely affect other economic activities in the areas concerned. The C*f*ED considers that St Peter Port Harbour Action Area provides opportunities to successfully address access, parking and overall physical enhancement issues. The issue of parking is addressed in the Public and Private Parking Thematic report.

Agents highlighted that changing market conditions and higher costs have placed increasing pressure on viability of office developments in Guernsey. For example the length of lease

terms has markedly reduced from 21 years to 10-15 years. Break clauses are coming earlier as a consequence around the 6 year point, placing pressure to demonstrate a return on the project within this shorter timeframe. Agents advise that there is a divergence between what tenants are wanting and what landlords can provide. Interestingly, there is no speculative office developments being undertaken in Guernsey at present. The developers of the extant permission of Admiral Park have indicated they will not proceed without a significant pre-let. Yet agents reported an unmet demand for large scale high quality office accommodation currently which is being driven by recent mergers and acquisitions of existing businesses on Island rather than pressures from off-island companies.

There appears to be a contradiction between the premises available to the market and the indicated market demand. There is an overall increase in availability of small and mid-sized units (up to 500m^2) and a decrease in the availability of larger scale units (over 1,000m^2). Feedback from the agents suggests this is because some of the stock being marketed is not suitable to upgrade to meet demand, and is left sitting on the market and therefore should be released. Supporting the view that the existing stock is unsuitable, 50 premises have been on the market for more than a year and the majority of these are under 250m^2. The question of whether these properties could be made suitable relates to the assessment of quality but also the viability of office type development in the current climate. In relation to the large scale units, there is consensus there is not sufficient provision on the Island to provide the necessary headroom. This is highlighted by the current unmet demand for large floorplate accommodation. It also points to an issue of viability of office developments, due to higher costs and changing terms/expectations in the market. Agents suggest government intervention or support may be required to stimulate the market, similar to recent developments in Jersey.

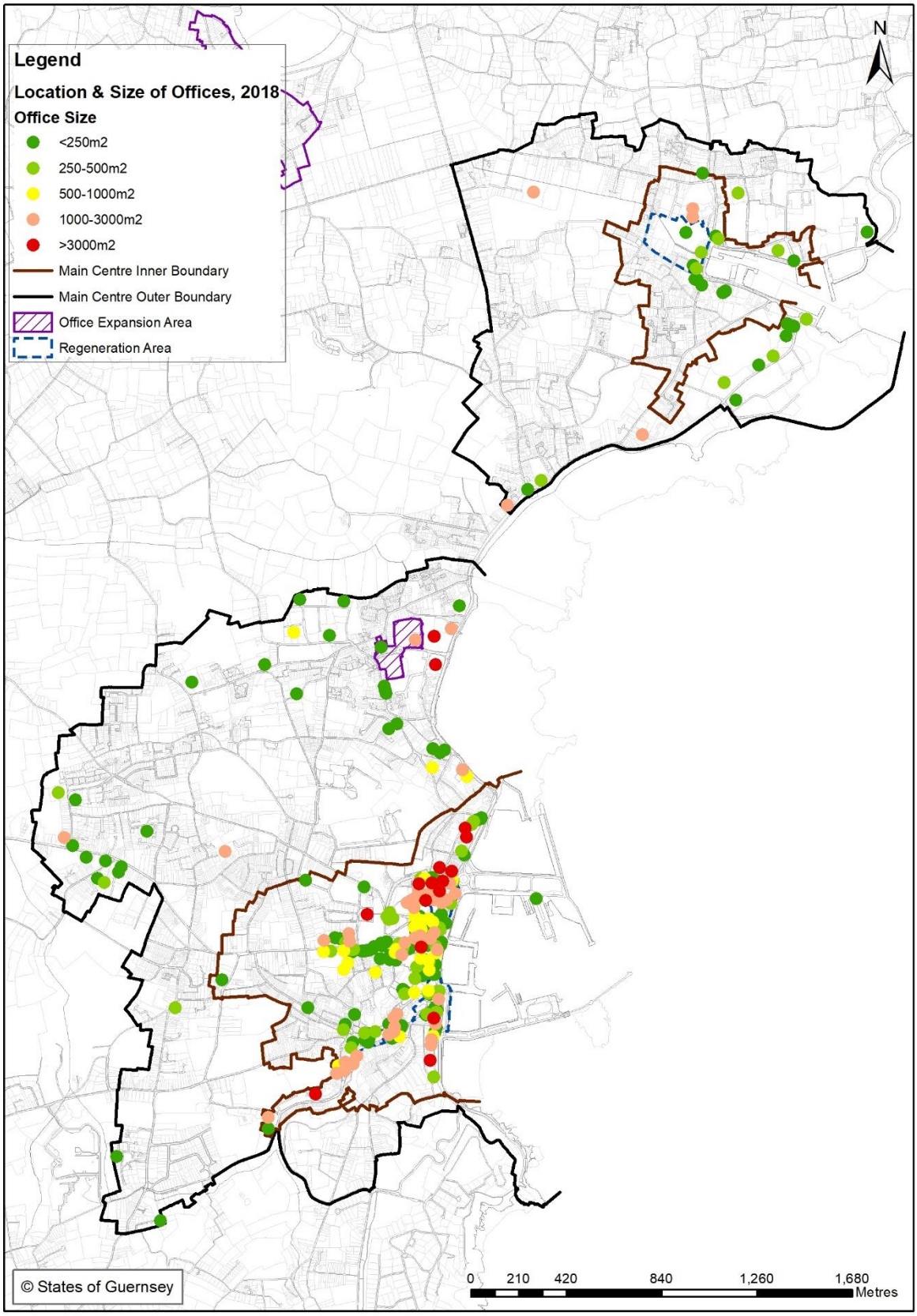


Figure 9: Size and location of existing office accommodation within the Main Centres as at December 2018

2 MONITORING POLICY PERFORMANCE - OFFICES

Research indicates that change in ways of working, which will intensify in the future, like elsewhere, will result in more remote working and the requirement for smaller permanent office suites as a result. There is likely to be a continued demand for high quality office space but for smaller rather than large scale units. For these reasons there may be in the future be more demand for offices which are of very high quality even if the total floor space is small. This would indicate that a review may be required in the future of the current policy provision allowing offices under 250m2 to change use away from office use and a move towards assessment of quality rather than size when allowing flexibility to change use away from office use, to encourage the provision of high quality, small office units if evidence supports this is what is required.

Over the last 6 years, there has been a 9% decrease in overall office stock on the Island, in contrast to the forecast requirement for growth in this sector. Improvements to the capturing of data have been made by the Planning Service from the Cadastre to ensure these changes can be mapped spatially and therefore fully assessed moving forward.

INDICATOR – No. of large scale office premises in the portfolio		
Plan Objective		Plan Objective 3: Support a thriving economy.
Target		Maintain and increase number of premises >1,000m^2.
Outcome	2018	No permissions granted for premises over 1,000m^2; approval was granted for a 1,800m2 reduction in planned office floorspace. 64 office premises in total over 1,000m2.
	2017	No permissions granted for premises over 1,000m^2; 66 office premises in total over 1,000m^2.
Target met?		No - at this time the number of large scale office stock has decreased by 1 premises since 2012.
Comments (including any risks to delivery)		Apart from the 1 application highlighted above, there is no evidence of any loss or sub/division through the planning system. The application within the Office Expansion Area related to a unique situation and not likely to occur on this scale again. Improved data capture and recommended further analysis should give greater detail on these changes. Taking a longer term view on the data, it is showing a relatively stable portfolio in terms of quantum with a shift towards smaller units. The sector is not showing the growth expected.
Action		2017 AMR Action Update – the 2017 AMR included an action for the Development & Planning Authority to monitor the subdivision, vacancy levels and availability to the market of large scale premises. This action is carried forward. 2017 AMR Action Update – the 2017 AMR included an action for the Development & Planning Authority at an officer and political level to seek/encourage delivery of new primary office accommodation in the development of Regeneration Areas and Harbour Action Areas that is adaptable to suit medium to large businesses. This action is carried forward as: Development & Planning Authority at an officer and political level to seek /

	encourage delivery of new high quality office accommodation in the development of the Office Expansion Area, Regeneration Areas and Harbour Action Areas that is adaptable to suit a range of businesses.

Summary

The IDP policies provide for a range of office development in the Main Centres, in particular providing for larger floorplate primary accommodation at the designated Office Expansion Area. The IDP gives protection to the existing stock whilst recognising the accommodation ranges in quality from tertiary to primary accommodation and provides the opportunity for the loss of existing tertiary accommodation where it is demonstrated that it cannot be upgraded to modern standards. The policies provide even greater flexibility for small scale units, with the ability to change out of office use to another suitable Main Centre use in response to market demand.

The IDP policies also provide for opportunities within Local Centres of the appropriate scale to maintain or enhance the character and vitality of that particular Local Centre. Outside of Centres, opportunities are more limited to home based employment or through the appropriate conversion of redundant buildings.

A review of the implementation of the IDP during 2018 indicates the planning policies are delivering the aims and objectives of the SLUP in relation to office accommodation. While the current planning polices reflect the direction of the SLUP, the policy approach seeking existing accommodation to be upgraded to primary quality where feasible may be unrealistic and no longer be appropriate. Instead there is general consensus on the need to provide a range of accommodation of different sizes and quality to meet business needs now and in the future. The current flexibility in planning policies to allow for release of existing stock to alternative uses may no longer be appropriate in light of growing demand for small to medium sized high quality units and the continuing surplus of stock of unsuitable quality. In addition, there is a call to re-examine the continued protection of some existing housing stock that forms part of overall office development in light of the current housing pipeline supply and future requirements.

To this end, a detailed analysis of the existing office stock within the Main Centres against the suggested quality criteria should give an agreed picture on the range and quality of the existing stock. It is recommended that this is prepared in partnership with the industry. Further analysis of whether this is an appropriate range of accommodation to meet business needs can then be undertaken with the C*f*ED. This research should then inform the 5 year review of employment land supply and any requirement to amend planning policies.

It is noted that the continuing surplus of unsuitable stock may also be linked to viability of developments. Agents highlighted that changing market conditions and higher costs have placed increasing pressure on viability of office developments in Guernsey. This view is supported by what is happening in the market. Admiral Park developers have indicated in the past they will not proceed without a significant pre-let of this development. Yet there is some unmet demand for large floorplate accommodation driven by mergers & acquisitions from on island business. Industry is calling for some government intervention, similar to

recent office developments in Jersey. This is a matter for the C*f*ED to lead on and investigate further.

Summary of monitoring requirements

- Development & Planning Authority to continue to monitor delivery of the office accommodation within the Office Expansion Area and review the need to prepare a Development Framework for the Office Expansion Area in 2019;
- Continue to monitor the number of cases where applications for a use similar to office use are permitted as a minor departure to the IDP policies, reflecting the changing nature of businesses requiring office accommodation. If this rises, the Development & Planning Authority will need to reconsider whether an amendment to policy is required;
- Monitor the changing nature of business and appropriateness of use classes and policy; and,
- Monitor the subdivision, vacancy levels and availability to the market of large scale premises.

Summary of actions required

- Development & Planning Authority to continue to liaise with the Committee *for* Economic Development and the Policy & Resources Committee at an officer level in order to support further work that may arise from the implementation of the recently approved States Economic Development Strategy, particularly on the monitoring of our economy;
- Development & Planning Authority to liaise with the Committee *for* Economic Development at officer level and commercial agents and Industry representatives to assess the recommended portfolio set out by the ELS (2014) together with other existing stock within the Main Centres against the criteria for quality. Further analysis of whether this is an appropriate range of accommodation to meet business needs can then be undertaken with the Committee *for* Economic Development. This research should then inform the 5 year review of employment land supply and any requirement to amend planning policies; and,
- Development & Planning Authority at an officer and political level to seek / encourage delivery of new high quality office accommodation in the development of the Office Expansion Area, Regeneration Areas and Harbour Action Areas that is adaptable to suit a range of businesses.

Industry, Storage & Distribution

Introduction

The Island Development Plan (IDP) has an objective to 'support a thriving economy'. The Plan makes policy provision for a range of new employment developments and generally supports existing employment uses throughout the Island where they make a positive contribution to the sustainability of a strong local economy.

This report will consider the policies that cover industry (use classes 24, 25, 26 and 27) and storage/distribution uses (use classes 22 and 23) including homebased employment across all of these use classes. Industry in this context includes traditional activities such as manufacturing and new forms of activity such as data hosting and website development.

The report will analyse the effectiveness of the IDP policies in delivering the requirements of the Strategic Land Use Plan (SLUP) and the objectives of the States and will also highlight any blockages to the delivery of industry, storage, distribution development in relation to the IDP policies.

Strategic context

For industry and storage and distribution, the SLUP requires the IDP to make provision for a comprehensive range of land opportunities for employment uses maintaining the focus of these uses within and around the Main Centres of St. Peter Port and St. Sampson/Vale, specifically including Admiral Park and the Saltpans and recognising that some opportunities may exist in Local Centres. The SLUP directs the IDP to also make provision for certain small-scale businesses outside the Main and Local Centres, typically those in the lower value industrial and service sectors, such as those requiring workshops, secure storage or open yards, who may have a justifiable need to be located Outside of the Centres based on the nature of operation or have difficulty in finding a suitable site in the Centres.

The IDP's approach to industry and storage and distribution reflects the findings of the Employment Land Study 2014 that the Island is now over-provided with industrial, storage and distribution premises. In managing change in this sector it is recognised that there remains a need to specifically protect some land for Industry and Storage and Distribution to ensure suitable land is available that can be readily developed for a range of industrial and storage/distribution purposes. The IDP, therefore, seeks to consolidate industry, storage and distribution uses on 4 designated Key Industrial Areas ("KIA") each with an identified expansion area known as Key Industrial Expansion Areas (KIEAs) located in and around the Main Centres. Longue Hougue KIA is reserved specifically to accommodate a range of heavy and specialist industrial development including waste facilities. There is also a KIEA located Outside of the Centres at La Villiaze to the north of the airport. In addition, the IDP policies require particular criteria to be satisfied before allowing the loss of existing industrial, storage and distribution sites to other uses where these are located outside of the KIAs and are situated along the Inter-harbour route due to their good access.

The IDP policies direct industry, storage and distribution uses toward the KIAs and KIEAs, and also support industrial use (including creative industries) elsewhere within the Main

Centres. Change of use between industry, storage and distribution uses is in principle supported. Existing sites within the KIA should be re-used and redeveloped before consideration is given to development within the KIEAs. Only where there is no suitable alternative site within any of the KIAs or Main Centres will development be considered in the expansion areas and will be subject to the approval of a Development Framework to achieve the effective and efficient use of the land. The KIEAs provide a buffer should the demand for employment floor space unexpectedly rise for industry, storage and distribution uses or should the needs of a particular use not be able to be accommodated. Within the Main Centres and Main Centre Outer Areas new industry and storage and distribution use is also possible through conversion of a redundant building. In addition, due to their particular nature, IDP policy supports provision of new creative industries in Main Centres.

In Local Centres new industrial, storage and distribution uses are also supported where they are of an appropriate scale for the Local Centre concerned, support them as sustainable centres and are not of a scale and cumulative impact that would undermine the vitality of the Main Centres. Outside of the Centres, these uses are supported at the KIEA at La Villiaze, St Saviour, on redundant glasshouse sites and brownfield sites under certain circumstances and providing certain criteria are met and through conversion of redundant buildings.

The IDP policies support, in principle, the continued use, extension, alteration and redevelopment of existing industrial and storage and distribution sites throughout the island and are generally supportive of change of use between these uses. The IDP policies are also generally supportive of change of use away from these uses outside of the KIAs and where sites are not on the container route (the Inter-harbour route).

Economic Development Strategy, 2018

The States' approved Economic Development Strategy[1] is to deliver a strong, sustainable and growing economy and seeks to achieve growth in the economy by focusing on 4 core areas:

- Building on what we do well now (**maintain**);
- Achieving diversification into new areas of economic activity to secure long-term prosperity e.g. digital industry (**diversify and grow**);
- Reaffirming that Guernsey is open for business through the actions we take (**open for business**); and,
- More actively monitoring and reporting on our economy, and use those insights to inform our actions (**monitoring the economy**).

The strategy has identified key areas of work under each of these core headings, which the States hopes to pursue through the Committee *for* Economic Development (C*f*ED) working alongside other States' Committees and with external partners. This work has subsequently been assigned differing levels of priority according to the categories of "critical", "important" and "beneficial".

Of particular interest is the development of monitoring and reporting on our economy and whether any changes or additions to data collection and monitoring of land use and

[1] Billet D'État XVIII 2018

reporting by the Authority could help or support this work or whether the data collected by CfED could inform future AMRs. The C*f*ED recognises the benefits of further data collection in order to provide more accurate and evidence based recommendations on industrial and storage and distribution accommodation requirements, as well as in other areas. However, the C*f*ED has highlighted in its response to consultation on monitoring this year that this will impact upon its ability to carry out work in certain areas, including the collation of data for IDP monitoring purposes. Nevertheless, C*f*ED has advised it will continue to review in the future as and when time and resources allow.

2017 AMR Action Update – The 2017 AMR included an action for the Development & Planning Authority to liaise with the C*f*ED and the Policy & Resources Committee at an officer level in order to support further work that may arise from implementing the recently approved States' approved Economic Development Strategy, particularly on the monitoring of our economy. Production discussions at officer level have taken place and it is recommended that this should continue when time and resources allow, according to the agreed prioritisation of work.

Background to the Industry, Storage & Distribution Sectors

Overall the wider context of the findings of the Employment Land Study (ELS) 2014 is that as a result of the ongoing global decline in manufacturing and the loss of Low Value Consignment Relief on exports, the island is now overprovided with industrial, storage and distribution space and will have a continuing declining need for such over the 10 year life of the IDP. The ELS 2014 forecasts a need for around 2.26ha less industrial, storage and distribution land over this period (sites with or without premises) and recommended the following portfolio of land:

Key Industrial Areas		
Area category	**Area name**	**Area (m2)**
Key Industrial Areas	Pitronnerie Road	60,388
	Northside	169,667
	Saltpans/Braye Road	107,911
	Longue Hougue	194,849
	Total	**532,815**
Future reserves		
Light Industrial Areas	La Villiaze	11,548
General Industrial Areas	Pitronnerie Road expansion	7,288
	Saltpans/Braye Road expansion	1,567
	Northside expansion	36,333
Sub total		**+56,736**
Specialist Industry	Longue Hougue	121,945
	Chouet Headland	78,781
Sub total		**+200,726**
Total		**+257,462**
Planning Requirement		**-22,600.**

Figure 1: ELS 2014 recommended portfolio of land for industry, storage & distribution

As part of the qualitative and quantitative research for the Annual Monitoring Report, the Planning Service has updated the findings of the ELS 2014 by reviewing the changes over the last 6 years since the baseline date of 2012 to the profile of the existing accommodation and the recommended portfolio. The details of these changes are provided in the 2018 Update Report to the ELS. It is intended to publish an annual update report to the ELS, with more comprehensive review when the IDP reaches its halfway point (5 years). The summary of the changes for industry, storage and distribution between 2012 and 2018 are set out below:

- 221,598m^2 industrial accommodation in 457 premises, located on 1,564,267m^2 of land. This represents approx. 4.63% decrease in industrial premises since 2012 but represents a gain of 0.64% of industrial land;
- 197,566 m^2 storage and distribution accommodation in 250 premises, located on 409,445m^2 of land. This represents approx. 7.5% increase in storage premises since 2012 together with a notable gain of 21.05% of land;
- Majority of the industrial premises are under 250m^2 (61%), with an increase in the number of small and medium sized units since 2012. Majority of storage and distribution premises has changed from 2012 from units under 250m^2 to units between 250m^2 – 500m^2;
- Majority of the industrial, storage and distribution accommodation remains located within and around the Bridge Main Centre (c.46%), followed by significant provision within and around St Peter Port Main Centre (c.27%). Overall the majority of the floorspace is located within designated Key Industrial Areas in the Main Centres. There is limited provision of these sectors within the Local Centres (c.3%). Provision Outside of the Centres is in the majority small scale in nature with some large standalone sites;
- The construction industry remains an important sector for the island, and while it has been in decline over the last 6 years, there are recent signs of recovery;
- Future demand for industrial and storage type premises is expected to come from premises displaced by development through the consolidation strategy in the IDP and may also come from growth in creative industries and digital industries (e.g. data storage) or future States' projects (e.g. Hydrocarbon Supply Programme);
- Vacancy rates for industrial premises increased from 2.7% of stock in 2012 to a peak of 5.1% in 2014 falling down to 3.9% of stock in 2017 and continued falling in 2018 to 1.7%. Vacancy rates for storage and distribution premises increased from 8.9% in 2012 to a peak of 15% in 2014 steadily falling over 2 years to drop significantly down to 1.4% at the end of 2017 and increased back to 6.7% in 2018;
- The range of size of industrial, storage and distribution premises available to the market in 2018 is similar to the baseline year of 2012, with the availability of large scale premises for both sectors in contrast to 2017. One notable difference however, while the majority of industrial premises 'to let' remains under 250m^2, the majority of storage and distribution premises being marketed in 2018 changed away from small scale (<250m^2) to 250-500m^2 size category;
- Overall, at the end of 2018, there was very little on the market for industrial uses and moderate availability for industrial storage and distribution uses. Monitoring supply of units for sale and for let, further shows a lack of units for sale. Whilst overall demand is low, those seeking industrial, storage and distribution premises

may find there is limited choice of property within their price range or specification, albeit improved opportunities since last year;
- Key requirements for industrial, storage and distribution premises remain similar to those identified in 2012, although questions have been raised over the importance of access to the Inter-harbour Route and whether the current policy test of 12 months of marketing remains appropriate.

The full 2018 ELS Update Report can be downloaded from the States' website (www.gov.gg/planningpolicy).

As part of this work, on 5th March 2019, the Planning Service together with Business Innovation & Skills hosted a workshop with representatives from commercial agents and commercial organisations on Island, to gain qualitative feedback on the performance and effectiveness of the IDP policies relating to the office, industry and storage/distribution sectors. The workshop examined the current data on these sectors and discussed the drivers behind the changes and trends as well as appropriateness of the employment land portfolio. The feedback received from the Agents is fully incorporated into the 2018 Update Report on the ELS and is referred to in this report as appropriate.

Despite the wider context of managing decline, the IDP makes provision for small scale businesses Outside of the Centres in accordance with the direction of the SLUP. Provision is made to accommodate those businesses which may have special requirements due to the nature of their operations, such as those requiring workshops, secure storage or open yards, who may have a justifiable need to be located Outside of the Centres based on the nature of operation or have difficulty in finding a suitable site. During the debate on the IDP, the States resolved[2] to investigate bringing forward States' owned land to meet this need. These investigations culminated in the C*f*ED bringing forward a policy letter proposing the States should facilitate the use of any of the following areas of land owned by the States of Guernsey for industrial and storage purposes:

- Mont Crevelt/the Longue Hougue reclamation site (c.134,760m^2);
- Griffith's Yard (c.15,160m^2);
- Brickfield House industrial area (c.7,120m^2); and/or,
- Pitronnerie Road (1.8acres).

These areas of land could provide for the 2 categories of need identified by the C*f*ED:
- Category 1: basic open yard facilities for the purposes of open storage of plant; materials, and equipment principally for the construction industry; and,
- Category 2: land for heavy industrial purposes.

Whilst the C*f*ED recognised that the IDP now provides much greater flexibility for the private sector to bring forward sites for industrial and storage uses, these policies are yet to fully deliver in terms of meeting the immediate commercial premises needs of 2 broad categories of business as described above. In proposing the sites, the C*f*ED outlined its ultimate desire

[2] Billet d'État XXV & XXVII - P.2016/25 Amdt 32 Proposed by Deputy Laurie B Queripel, Seconded by Deputy M Fallaize

for the delivery of commercial premises to be left to market forces. It considered the States is in a position to increase the availability of premises suitable for these types of business in the short term but the provision of these sites should be made available on commercial terms and with no form of subsidy and no preference for any business. In addition, any land set aside for heavy industrial purposes should be limited to businesses able to demonstrate a genuine need for such premises. The C*f*ED proposed the continuing provision of these sites should be subject to review.

The States decided[3] to direct the States Trading and Supervisory Board (STSB) to make the first 3 sites available, discounting Pitronnerie Road, on the commercial basis proposed by the C*f*ED subject to a review no later than 13th November, 2022.

In preparing the IDP, research into the demand for small scale businesses that may need to be located Outside of the Centres as identified by the SLUP found that Fontaine Vinery and the approved temporary use at Les Osmonds Lane and Saltpans Housing Allocation provided the only firm demonstration of demand. The 3 States' owned sites identified by the States for such uses would provide over 157,000m^2 (39 acres) 6.5 times this identified demand. Delivery of this potential supply is reported on in the section entitled 'Key Industrial Areas and Key Industrial Expansion Areas' below.

Planning Permissions in 2018

During 2018 a total of 34 planning applications were received relating to industry, storage and distribution uses. Of the 34 applications, 28 were granted planning permission, 6 applications were refused.

Of the 28 applications that were granted planning permission:

- 2 applications were for works/alterations to existing premises;
- 2 applications were for homeworking;
- 4 were for temporary uses ;
- 9 proposals resulted in a gain in accommodation/land;
- 5 proposals resulted in the loss of accommodation/land to other uses; and,
- 6 proposals were for changes between the sectors (resulting in no net gain or loss).

With regard to the temporary permissions granted, 1 application concerned the continuation of temporary storage uses at the Fontaine Vinery site and another proposal concerned the continuation of a temporary storage use on land within the designated Saltpans Housing Allocation. There was a temporary permission granted for a storage compound in connection with a particular construction project which has since been removed. Of interest, a proposal was granted a temporary change of use to allow the Authority to monitor the impacts of the proposal on the surrounding area. The proposal involved the change of use from a redundant glasshouse site (over 7,000m^2 and c.1 hectare of land) to processing of seaweed.

Of the proposals granted planning permission that resulted in a net gain in land/premises for storage/industry/distribution uses, 6 applications concerned change of use into storage

[3] Billet D'Etat II, 2018

or industry from agriculture, with 2 of these applications involving the provision of large scale self-storage facilities (980m^2 and 1115m^2 respectively). One application involved the change of use from retail to storage. Two applications involved the extension of existing premises. Aside from the self-storage developments, the proposals all concerned small scale provision of units or open storage.

22% of the applications granted planning permission involved a change of use between the sectors. The data shows a clear trend out of General Industry (Use Class 25) into either General Storage or Distribution Use (Use Class 22) or waste facilities (Use Class 27). This is a reversal of the trends last year to move from storage to industry/waste. The majority of these planning permissions involved greater than 500m^2 of floorspace.

The planning permissions involving the loss of industrial, storage and distribution floorspace all related to standalone sites outside of the designated KIAs within the Centres, as intended by planning policies.

A review of 2018 planning applications shows spatially there is a net gain Outside of the Centres that is counteracting any losses within the Centres. Similar to 2017, there is also a notable gain during 2018 in the waste storage, processing and facilities sector (Use Class 27). This type of use has only been monitored since the introduction of the new Use Class Ordinance in March of 2017 resulting in no comparable data prior to this. It is considered the activity for this type of use is being driven by the implementation of the Island's waste strategy.

Use Class / Location	General storage or distribution (22)	Special storage (23)	Light industry (24)	General industry (25)	Special industry (26)	Waste (27)	Total
Main Centres	2,366	0	106	-6,483	0	3,351	**-660**
Local Centres	0	0	-173	0	0	0	**-173**
Outside of the Centres	2,024	0	340	**6,639**	0	0	**9,003**
Total	**4,390**	**0**	**273**	**156**	**0**	**3,351**	**8,170**

Figure 2: Net change in floor space (m^2) by Use Class granted planning consent during 2018

During 2018, there was a notable net gain of 2.53hectares of industrial, storage and distribution land. The majority of this land is located Outside of the Centres.

	Net change over 1st quarter 2018	Net change over 2nd quarter 2018	Net change over 3rd quarter 2018	Net change over 4th quarter 2018	Net Change over 2018
Industrial Land	0.0223	-0.052	1.0064	--0.12	0.8567

	Net change over 1st quarter 2018	Net change over 2nd quarter 2018	Net change over 3rd quarter 2018	Net change over 4th quarter 2018	Net Change over 2018
Storage & Distribution Land	0.5771	0.271	0.4	0.4226	1.67.7
Total	-0.5994	0.219	1.4064	0.3025	2.527

Figure 3: Net change in industrial and storage & distribution land during 2018(hectares)

In relation to designated industrial/storage land, the review of 2018 planning applications shows there were 7 planning applications received for sites within designated KIAs with only one proposal relating to a gain in storage accommodation and all the others were change of use away from General Industry to either storage or waste facilities.

No proposal resulted in loss or gain of industrial or storage/distribution premises within KIEAs. There were 2 applications received within KIEAs, both of which concerned minor alterations to existing storage land at Griffith's yard and therefore considered not to prejudice future comprehensive planning of the site.

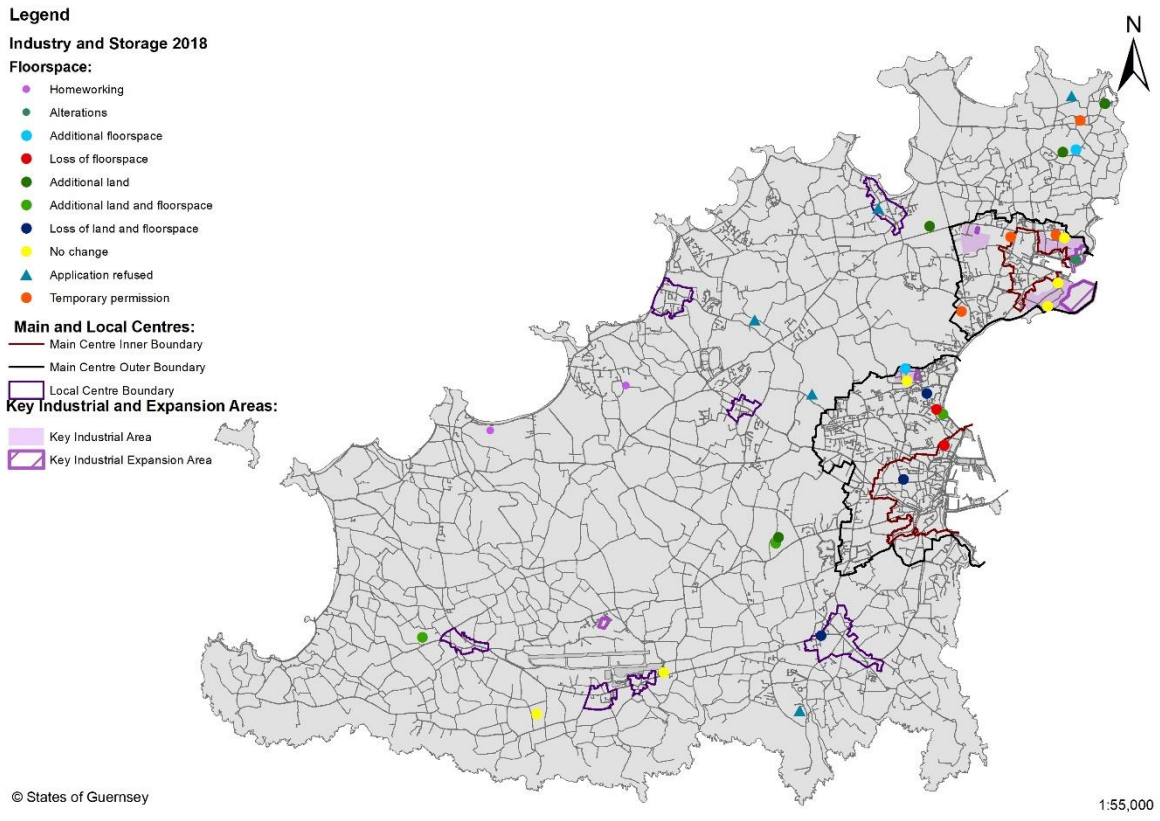


Figure 4: Applications received relating to industry, storage and distribution during 2018

Of the 6 applications refused planning permission, 5 were for proposals located on sites Outside of the Centres. 3 related to redundant glasshouse sites and were considered not to

meet IDP policy requirements by not demonstrating justifiable need for their use to be located Outside of the Centres and adequately making the case for the loss of agricultural land or the site was considered to make an important contribution to the wider open landscape. 1 proposal was considered to be contrary to Policy OC3 (a), having not demonstrated a justifiable need to be located Outside of the Centre and due to concerns about the scale of the proposal. Lastly 1 proposal located within a Local Centre was refused because of substandard residential amenity for future occupiers and not related to the loss of employment land.

Policy Performance

Key Industrial Areas and Key Industrial Expansion Areas

During 2018 there was a level of activity within the KIAs that indicates positive investment is occurring within the KIA's to enhance and improve their accommodation offering and demonstrates flexibility between uses in accordance with the intentions of IDP policy.

The IDP policies are also intended to offer sufficient flexibility to enable the KIAs to accommodate a range of uses from start-ups and incubator units to larger businesses, so that the island can accommodate any new industrial sectors that emerge over the lifetime of the IDP and respond appropriately to changing economic conditions. Looking to the future, the C*f*ED considers several upcoming States' projects are likely to lead to changes in industrial accommodation requirements in the coming years. This includes the delivery of the Hydrocarbon Supply Programme and Energy Policy. The future requirements from upcoming States' projects and the creative industries highlighted by the C*f*ED last year as an emerging sector should be discussed in more detail as they emerge.

2017 AMR Action Update - the 2017 AMR included an action to open up a regular dialogue with the C*f*ED to discuss the needs of creative industries and other emerging sectors through creation of an officer level working group. Discussions at officer level have been held and it is recommended that there is a continued dialogue with the Committee *for* Economic Development to discuss the needs of creative industries and other emerging sectors through creation of an officer level working group.

The greater flexibility introduced by the IDP to allow for storage and distribution uses on KIAs has already had a positive impact, supporting change of use between industry and storage or waste facilities during 2018.

Overall, there were no losses of industrial, storage and distribution premises on land within the designated KIAs or from sites along the inter-harbour route indicating the IDP policies are giving a suitable level of protection to these uses as intended. However, the rationale for this policy approach is being questioned by feedback received from commercial agents, which is discussed further in the section entitled 'Type, specification and size' below.

In relation to the capacity of the KIAs, there remains a large undeveloped area at Saltpans KIA. This requires a Development Framework to be prepared to guide the development proposals on this site and to date there has been little interest from the private sector to bring this site forward.

As existing sites within the KIA should be re-used and redeveloped before consideration is given to development within the Key Industrial Expansion Areas, during 2018, in accordance with policy, only alterations to existing uses came forward that would not prejudice the comprehensive development of these sites. 2 of these proposals granted planning permission were for alterations to facilitate the use of States' owned land (5,000m^2) for open storage compounds by the private sector in line with a States' direction referred to earlier in this report.

In providing States' owned land for such purposes, the States did recognise the potential for a greater number of suitable sites than at present to be provided by private landowners to come forward over time under the new enabling policies of the IDP. Therefore, to ensure that the provision of such facilities by the States does not have a detrimental effect on the commercial marketplace, either as a result of stymieing new developments coming on-stream or by undermining the commercial viability of existing sites, the decision to provide States'-owned land for industrial/storage purposes is an interim measure and will be reviewed again by the States in 2022.

STSB indicated that all the existing Fontaine Vinery tenants except for a couple of tenants with specialised requirements have now been relocated to Griffiths Yards. STSB has highlighted that provision and marketing of the remaining part of the Griffiths Yard site will provide the opportunity to test the need for further open storage. It is agreed that marketing would provide useful feedback and would help inform an action agreed last year to monitor the supply of States' owned land for such uses and any associated impacts. The following is the status of the States' owned sites identified:

Name of site	Potential total area of land	Area in industrial/storage use	Comments
Mont Crevelt/the Longue Hougue reclamation site	c.134,760m^2	0	
Griffith's Yard	c.15,160m^2	5,000m^2	In 2017, the STSB brought forward part of the Griffths Yard site to provide 11 open storage compounds, over 5,000m^2. During 2018, planning permission was granted to add another container within the approved 5,000m^2 compound and other minor alterations.
Brickfield House industrial area	c.7,120m^2	0	
Pitronnerie Road	c.7,200m^2	0	No activity on this site.

Figure 5: List of States' owned sites and their current use

2017 AMR Action Update - the 2017 AMR included an action to incorporate the supply of States' owned land for such uses into future monitoring. This has been undertaken and will be monitored and reported on moving forward.

Main Centres & Main Centre Outer Areas (other than KIAs and KIEAs)
There were no proposals for new creative industries within Main Centres or Main Centre Outer Areas in 2018 and it is therefore not possible to assess the performance of this aspect of policy.

There were 8 successful planning applications on sites within the Main Centres for alterations or extensions to existing uses to allow them to continue to operate (1 application), and for temporary storage uses (3 applications). There were 4 planning applications involving the loss of industry or storage/distribution to other suitable Main Centre uses (residential, public amenity and office).

As part of the consolidation strategy onto the KIAs, the change of use of existing industrial, storage and distribution accommodation to other suitable uses is supported elsewhere within the Main Centres and Main Centre Outer Areas. For 2018, there was a net loss of 660m^2 of existing industry or storage/distribution accommodation to other uses mainly residential.

The review of planning applications in 2018 indicates the Industry and storage and distribution policies for Main Centres and Main Centre Outer Areas appears to be working as intended.

Local Centres
The policies for the provision of employment uses within Local Centres are performing as intended, retaining existing accommodation where appropriate or allowing their release to other suitable alternative uses to maintain the Local Centres' range of services and facilities and reinforcing them as sustainable centres.

Outside of the Centres
In accordance with the direction given by the SLUP the IDP introduced a significant change to planning policies by providing an enabling policy for small scale business to locate Outside of the Centres subject to certain criteria. During 2018 there have been a number of planning applications relating to this new policy approach, resulting in a gain of 1.89 hectares of new industrial, storage and distribution land located Outside of the Centres. The policies provide for new industrial, storage and distribution accommodation in certain circumstances and support for extensions, alterations and redevelopment of existing accommodation.

A number of the planning applications received during 2018 for new industrial, storage and distribution accommodation Outside of the Centres were speculative developments with no specific end occupier and range in scale in terms of development. In view of the Spatial Policy which generally concentrates such uses within the Centres the IDP Policy OC3 requires demonstration that there is a justifiable need for a business to be located Outside of the Main or Local Centres due to the special nature or requirements of the business operation or it being demonstrated that there is a lack of suitable sites in the Centres. A specific end user

therefore needs to be identified in order to satisfy the policy test of justifiable need and a planning condition should be attached to ensure the accommodation remains available for use by small scale business as intended. Proposals for extensions to existing uses Outside of the Centres raises issues over the scale of extensions and at what point such extensions would be considered significant enough to activate the policy expectation that larger scale businesses of this kind should relocate to a suitable site within one of the Centres. Feedback from the C*f*ED to the 2017 AMR highlighted that there appeared to be some general misunderstanding about what is permissible under the IDP policies in this respect. Therefore it was agreed that the C*f*ED work with the Authority to promote the wider understanding of what may be achieved under the IDP policies, particularly on sites located Outside of the Centres.

2017 AMR Action Update - the 2017 AMR included an action for the Development & Planning Authority to work with the C*f*ED at an officer level to engage with industry representatives and agents to promote better awareness and understanding of policies for provision of all employment uses within the IDP, in particular focusing on those relevant to Outside of the Centres. There was no specific feedback from C*f*ED this year on this issue or following the agent's workshop. An internal review of the cases is recommended to ensure consistency of approach.

Home based employment policy appears to be performing well. 2 applications were received during 2018 for home based employment related to industry, storage and distribution uses and all were granted planning permission. It is noted that 1 of the 2 applications involved creative industries.

Overall supply

Overall the IDP polices generally focus industry, storage and distribution uses within and around the Main Centres and ensures that Local Centres may also provide some limited opportunities in accordance with the direction by the SLUP. During 2018, there was a significant net gain of 9,003m^2 of floorspace and a 1.89 hectare gain in industry, storage and distribution land located Outside of the Centres. Within the Main Centres, there was a net loss of floorspace (-660m^2) and land (-0.12Ha) from sites in the Main centre inner areas (none of which was from sites in KIAs, KIEAs or on the inter-harbour route), and a number of temporary permissions were granted for sites which are not expected to continue in the future. There were a number of planning applications for sites within the identified KIAs, largely for change of use from general industrial to storage type uses or specific waste related proposals (representing a net gain of 117m^2 and no change in the land area). This is in contrast to the forecasted decline of 2.26 hectares in these uses over the lifetime of the IDP.

The majority of the increase Outside of the Centres stems from one temporary planning permission for change of use of a redundant glasshouse (over 7,000m^2 and c.1 hectare of industrial land) to processing of seaweed to allow the authority to monitor the impacts of this proposal on the surrounding area. Remaining increase relates to two significant applications for self-storage facilities amounting to over 2,000m^2 of floorspace. Whilst there was a loss of floorspace from the Main Centres (outside of the KIAs and KIEAs) and Local Centres and the flexibiliy to achieve this is as intended by the policies IDP, there was a

greater increase of industrial,storage and distribution premises (both floorspace and land) granted planning permission Outside of the Centres than was expected for the second year in a row. Whilst some of these proposals also positively contributed to other aims of the IDP such as reuse of redundant buildings and clearance of redundant glasshouse sites the overall distribution of development should continue to be monitored closely to ensure the IDP policies are delivering the States' approved spatial strategy. Further investigation into the operation of the employment polices controlling development Outside of the Centres should be undertaken to inform the 5 year review of employment land supply.

Action - further investigation into the extent and nature of employment development occurring Outside of the Centres to ensure that policies continue to deliver the Spatial Strategy. This should form part of the scheduled 5 year employment land supply review.

The 2018 ELS Update Report indicates a fluctuation in industrial premises and storage and distribution premises over the last 6 years, with increases in previous years counteracted by losses in following years eventually returning to a similar position as the baseline year for each type. Review of the planning supply confirms this trend and indicates the main cause for losses or gains tends to come, with the exception of some specific waste related projects, from change of use between the two use classes and not ongoing growth in this sector. Of interest, both the 6 year trends and the review of the 2018 planning applications show a notable increase in land for industry, storage or distribution.

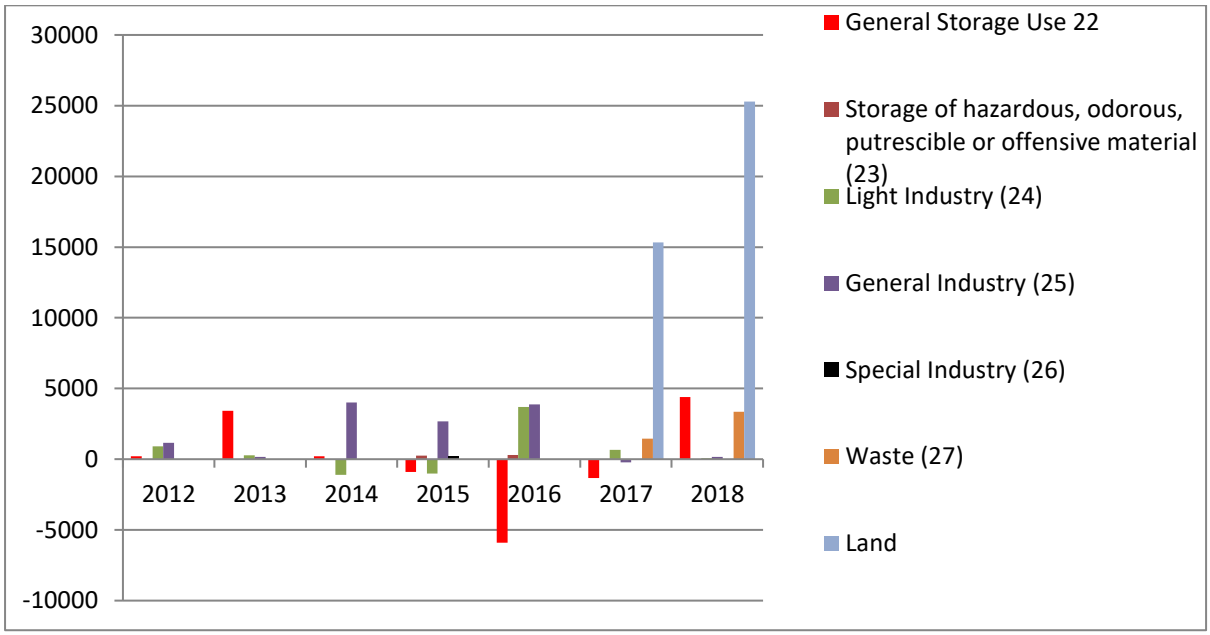


Figure 6: Supply of industry, storage & distribution through the planning system between 2012 and 2018, amended to show in accordance with revised use classes in 2017.

Agents and industry representative's feedback regarding the change in use classes for industry and storage is very positive but they are seeking further flexibility by increasing the extent of exemptions for change of use between industry and storage and distribution, suggesting increasing the threshold from 250m^2 to 500m^2, to increase responsiveness to the market and reduce bureaucracy. The impacts of increasing the threshold should be considered alongside a review of the full impact and benefits of any changes to the

exemptions and the rationalisation of uses within the Use Class Ordinance, 2017 to inform the 5 year review of employment land supply.

Action: The Development & Planning Authority should consider the impacts of increasing the threshold for such exemptions alongside a review of the full impact and benefits of the changes to the exemptions and the rationalisation of uses within the Use Class Ordinance, 2017 to inform the 5 year review of employment land supply.

INDICATOR – Supply of Industry, Storage & Distribution		
Plan Objective		Plan Objective 3: Support a thriving economy.
Target		2.26 Ha less land over the plan period. Majority of new development within Centres.
Outcome	2018	8,170m^2 net gain of industry and storage premises; 2.53 Ha net gain of industry and storage land. Majority of new development located Outside of the Centres.
	2017	47m^2 net gain of industry and storage premises; 1.35Ha net gain of industry and storage land. Majority of new development located Outside of the Centres.
Target met?		No.
Comments (including any risks to delivery)		The majority of the increase Outside of the Centres stems from one temporary grant of planning permission for change of use of a redundant glasshouse (over 7,000m^2 and c.1 hectare of industrial land) to processing of seaweed to allow the authority to monitor the impacts of this proposal on the surrounding area. Remaining increase relates to two significant applications for self-storage facilities amounting to over 2,000m^2 of floorspace. While there was a loss of floorspace from the Main Centres (outside of the KIAs and KIEAs) and Local Centres as intended by the IDP, there was a greater increase of industrial,storage and distribution premises granted planning permission Outside of the Centres than was expected for the second year in a row.
Action		The Development & Planning Authority to continue dialogue with the Committee *for* Economic Development to discuss the needs of creative industries and other emerging sectors through creation of an officer level working group. 2017 AMR Action Update – the 2017 AMR include an action for further investigation into the operation of the relevant policies controlling industry, storage and distribution Outside of the Centres. This action is carried forward as: Further investigation into the extent and nature of employment development occurring Outside

	of the Centres to ensure that policies continue to deliver the Spatial Strategy. This should form part of the scheduled 5 year employment land supply review.

Availability of industrial, storage & distribution premises

The research shows there has been a decrease in the availability of storage and distribution premises between 2012 -2017, indicating the impact of losing LVCR has played out and surplus accommodation has been taken up either by other storage or industry uses or lost from the portfolio.

This created a tight market place, with limited availability or choice for businesses in terms of premises. The 2018 data indicates a freeing up of the market at 4% accommodation available compared to 2% in 2017, with storage type premises representing the majority of these premises (c.78%) (see Figure 7 below). Monitoring supply of units for sale and for let, further shows a lack of units for sale compared to let with 21.3% of premises available to the market for sale in 2012 compared to only 5.4% available for sale in 2018 (representing only 3 premises being marketed for sale). Whilst overall demand is low, those seeking industrial, storage and distribution premises may find there is limited choice of property within their price range or specification, albeit improved opportunities since last year.

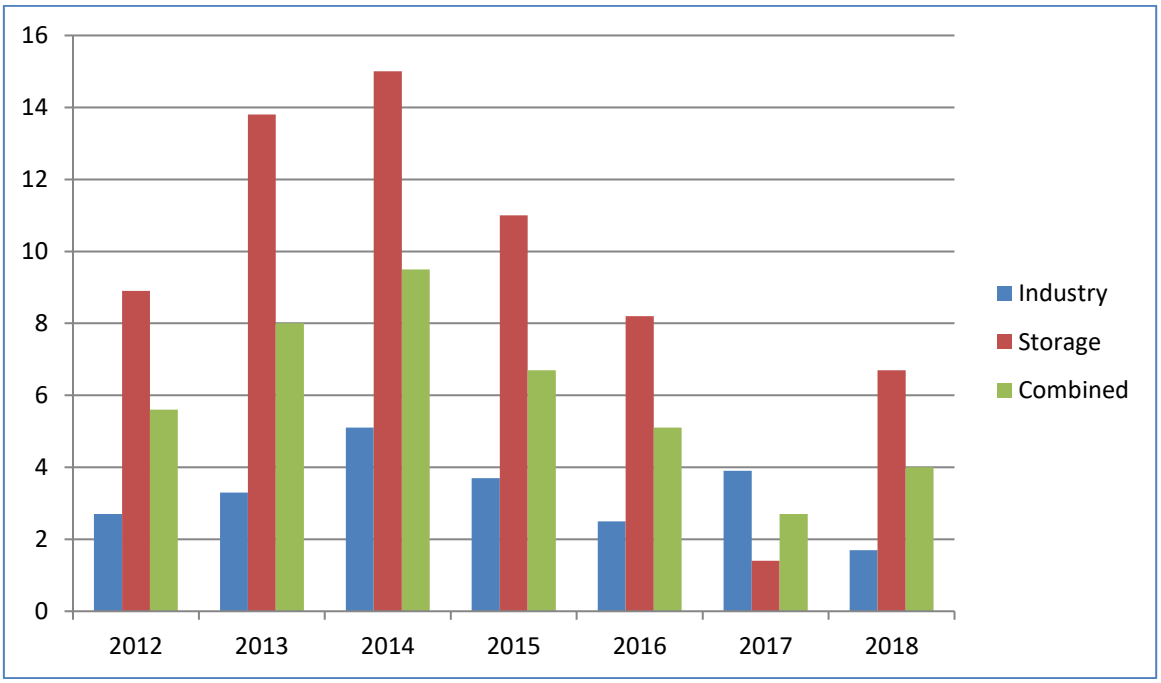
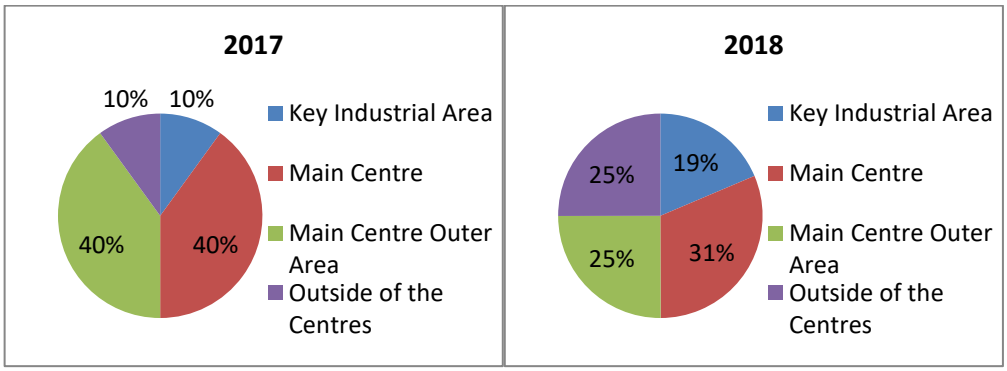
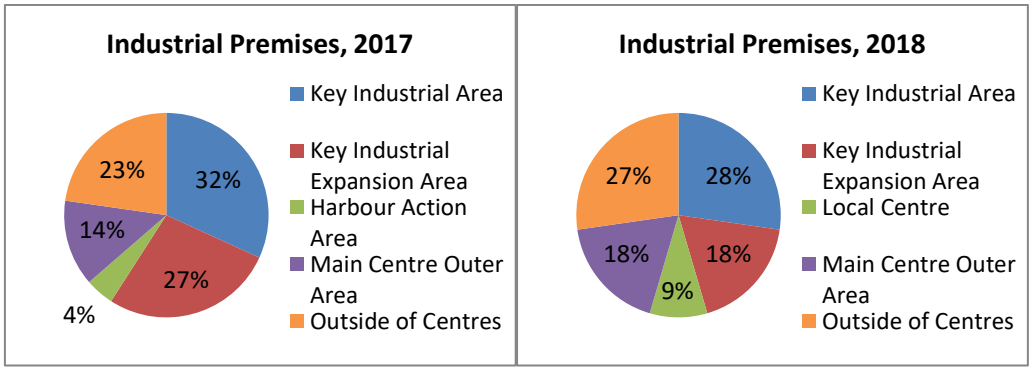


Figure 7: Vacancy rates for industry, storage & distribution marketed premises 2012 to 2018

2017 AMR Action Update – the 2017 AMR included an action to continue to monitor availability with Key Industrial Areas both 'for sale' and 'for let'. This action is carried forward. Analysis of the location of available industrial, storage and distribution premises reveals that 25% of marketed premises are located within a designated KIA and further c.8% are located within a Key Industrial Expansion Area. A further locational breakdown for industrial and storage and distribution uses is show in Figures 8 to 11 below.

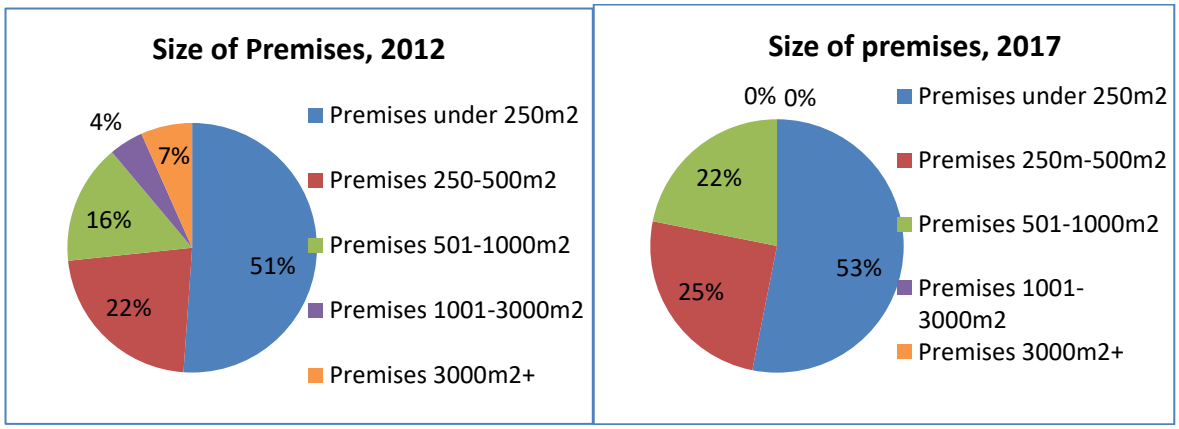


Figures 8 & 9: Location of storage & distribution premises available to the market, 2017 & 2018



Figures 10 & 11: Location of industrial premises available to the market, 2017 & 2018

The range of size of premises available to the market has returned in 2018 to be similar to the baseline year of 2012, with the availability of large scale premises. In contrast, the majority of premises being marketed in 2018 changed away from small scale (<250m^2) to 250-500m^2 size category, although small scale units remain a significant proportion (37%).



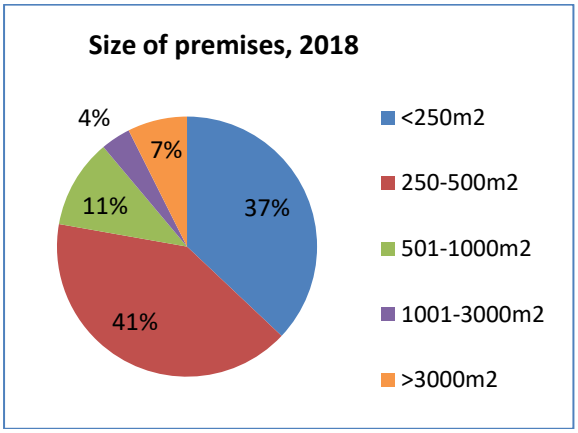


Figure 12, 13 & 14: Size of premises on the market in 2012, 2017 and 2018 (respectively)

Taking into account the wider context of managing decline and contraction of these land uses, the availability of premises within KIAs together with the provision of undeveloped land allocated to come forward for such uses if needed through the designated Saltpans KIA and the KIEAs for each of the other KIAs, the overall vacancy rates are not a major concern. However, given the tight market place, particularly within industrial premises, monitoring of the supply for sale and to let should continue and should there be no availability of premises within KIAs, this should trigger action by the Authority to positively bring forward a Development Framework for the Saltpans KIA and for one or more of the most appropriate KIEAs. The assessment of the most appropriate one to bring forward needs to be based on what market demand is at the time.

INDICATOR – Availability to the market within KIAs		
Plan Objective		Plan Objective 3: Support a thriving economy.
Target		Availability within identified Key Industrial Areas.
Outcome	2018	3 industrial/storage/distribution premises available within identified Key Industrial Areas
	2017	8 industrial/storage/distribution premises available within identified Key Industrial Areas.
Target met?		Yes.
Comments (including any risks to delivery)		
Action		None.

Type, specifications and size

Agent's feedback confirmed the key specification requirements for industry, storage and distribution remain unchanged from 2012 with businesses seeking:

- Adaptable space capable of sub-division;
- Access to the inter-harbour route or other appropriate road access; and,
- Appropriate floor to ceiling heights.

The IDP policies give a level of protection to existing premises located on the inter-harbour route, allowing change of use only in exceptional circumstances where it can be demonstrated:

- The premises no longer meets user requirements due to its age and condition and is incapable of being upgraded to meet modern standards in a manner that is viable; and,
- The property has remained empty or vacant, despite being actively and appropriately marketed for 12 consecutive months.

Given that access remains an important criterion for these types of uses, the higher level of protection offered by the IDP policy for such sites remains appropriate at present. There was a mixed response from agents on the importance of location and access to the Inter-Harbour Route for these sectors with some recognising its importance and others claiming it is no longer relevant. Whilst generally it was accepted that it was appropriate to apply a higher test for change of use of such sites on the Inter-Harbour route, the appropriateness of using marketing as the test in such cases and its usefulness was challenged and agents suggested this should be changed to an alternative test. However, no clear alternative test was suggested. In its response to consultation, the C*f*ED considered there is "a consensus that the manufacturing and industrial sector is unlikely to grow significantly in the future and should be concentrated in the previously identified Key Industrial Areas ("KIAs"). As such, it was suggested that there should be room for greater leeway in allowing more former industrial units to be converted to other uses." Further flexibility would require a formal change in the existing policies. As such, further research should be undertaken to inform this issue and should be considered as part of the 5 year review of employment land supply.

Future demand for industrial and storage type premises is expected to come from premises displaced by development within the Main Centres through the consolidation strategy in the IDP and may also come from growth in creative industries and digital industries (e.g. data storage). In moving forward it is noted that the C*f*ED recognises the benefits of further data collection in order to provide more accurate and evidence based recommendations on industrial and storage premises requirements but as it will continue to be mainly engaged with the higher priorities identified by the States' Economic Development Strategy and there are currently insufficient resources available within P&R, further work or research support on these matters will not progress further until time and resources allow. This will impact on the ability to assess policy performance and review policy approaches going forward.

2017 AMR Action Update: The Development & Planning Authority to open up a regular dialogue with the Committee *for* Economic Development to discuss the needs of creative industries and other emerging sectors through creation of an officer level working group. Discussions have been held at officer level and are recommended to continue.

Summary

The review of 2018 planning applications demonstrates that policies are flexible to allow for a range of new industrial, storage and distribution uses including creative industries throughout the island and also provide appropriate support to existing uses. The high level of planning approvals is evidence of the flexibility of the policies. In particular, the IDP's increased flexibility within identified KIAs of allowing storage and distribution uses has already had a positive impact.

The policy approach of designating KIEAs provides a buffer of land so the island can respond to new and emerging industries in the future. The policies currently in place will also allow in principle, delivery of the economic vision of the C*f*ED in terms of employment uses as far as they are set out in the States' Economic Development Strategy. There remains the need for the Authority to work closely with the C*f*ED particularly regarding monitoring and data collection.

The policies in place provide for small scale businesses Outside of the Centres in accordance with the directions of the SLUP and in both 2017 and 2018 have delivered significant additional industrial, storage and distribution land. This trend of supply Outside of the Centres as opposed to within the Main Centres may be an initial response to the change in policies brought in by the IDP and may not continue. Overall, the IDP policies are generally delivering in relation to the Spatial Strategy by concentrating development in the Centres but the analysis highlights the need to continue to monitor and review the extent and nature of employment development occurring Outside of the Centres to ensure that policies continue to deliver the Spatial Strategy.

In summary, monitoring research indicates that the IDP policies for industry, storage and distribution are still relevant and effective in delivering the requirements of the SLUP and the priorities of the States. There is a need to review the extent and nature of employment development occurring Outside of the Centres to ensure that policies continue to deliver the Spatial Strategy. This should form part of the scheduled 5 year employment land supply review.

Summary of monitoring requirements

- Continue to incorporate the supply of States' owned land for such uses into monitoring; and,
- Continue to monitor availability with Key Industrial Areas both 'for sale' and 'for let'.

Summary of actions required

- The Development & Planning Authority to continue to liaise with the Committee *for* Economic Development and Policy & Resources Committee at an officer level in order to support further work that may arise from implementing the approved States' Economic Development Strategy, particularly on the monitoring of our economy;
- The Development & Planning Authority to continue dialogue with the Committee *for* Economic Development to discuss the needs of creative industries and other emerging sectors through creation of an officer level working group;
- Further investigation into the extent and nature of employment development occurring Outside of the Centres to ensure that policies continue to deliver the Spatial Strategy. This should form part of the scheduled 5 year employment land supply review; and,
- The Development & Planning Authority should consider the impacts of increasing the threshold for exemptions from planning permission, particularly for change of use of such premises, alongside a review of the full impact and benefits of the changes to the exemptions and the rationalisation of uses within the Use Class Ordinance, 2017 to inform the 5 year review of employment land supply.

Visitor Accommodation

Introduction

Strategic Land Use Plan Policy SLP7 states that: *The Development Plans will seek to enable economically beneficial tourist-related development, especially where this improves quality and choice of facilities at all accommodation grades, whilst maintaining an adequate stock of visitor accommodation to support the future viability and growth of the industry.*

The Island Development Plan (IDP) policies for visitor accommodation seek to support existing establishments with flexibility for proposals to enhance the quality and marketability of accommodation and to change the type of accommodation between hotel, guest accommodation, self-catering and other similar visitor accommodation. IDP policies support the development of new visitor accommodation in Main and Local Centres, and also Outside of the Centres through a change of use of an existing building or conversion of a redundant building – the former being an option only open to visitor accommodation. Outside of the Centres the IDP policies also provide opportunities for visitor accommodation where this would be ancillary to an existing agricultural use where limited diversification would support that agricultural use. There is also potential for new visitor accommodation through the development of the Harbour Action Areas and Regeneration Areas.

The IDP policies for change of use of visitor accommodation aim to retain the stock of accommodation other than in exceptional circumstances. The Strategic Land Use Plan (SLUP) states that: *It is essential that sufficient, good quality visitor accommodation across all types and grades is available to meet demand and to allow growth of the visitor economy* and that *whilst in exceptional circumstances the release of properties and sites that are no longer suitable for tourism purposes may be allowed, in general terms, almost all such properties have already left the sector*.

The IDP policies are informed by advice from the former Commerce & Employment Department that the process of rationalisation of the Island's stock of visitor accommodation sought under previous development plan policies was complete and had achieved their goal of stimulating investment and establishing a sustainable level of accommodation. Moving forward, in order to ensure that the Island retains a sufficient level of accommodation to support the visitor economy, meet forecast demand and ensure a range of types of accommodation, there would be a need to resist the further loss of visitor accommodation establishments other than in exceptional circumstances.

This approach was on the basis of the aspirations for growth in visitor numbers set out in the 2015 document 'Visit Guernsey and Chamber of Commerce Tourism Group Strategic Plan 2015-2025'.

In addition, the IDP policies for change of use of visitor accommodation allow for smaller establishments to change use away from visitor accommodation use. These smaller establishments are able to move in and out of the visitor accommodation sector without adverse impact on the portfolio and the intention of this approach is to be able to apply

reasonableness so that operators of small establishments do not have to leave their home when the business ceases to operate.

In all other instances the IDP policies for visitor accommodation only support a change of use of visitor accommodation to another use where the applicant demonstrates exceptional circumstances. The policy tests are intentionally strict to ensure that loss of visitor accommodation to another use only occurs in exceptional circumstances in accordance with the requirements of the SLUP. Before a change of use can be considered, an establishment would need to demonstrate works are required to the establishment to meet the standard for the type of accommodation and that those works are either technically unfeasible or the works are both unviable and the premises have been marketed for sale and lease unsuccessfully.

The IDP policies for change of use of visitor accommodation to an alternative use - Policies MC8, LC6(B) and OC8(C) – were amended[15] by the States in approving the IDP in November 2016. These changes made the policy tests more onerous by requiring an applicant to demonstrate both that the works required to the establishment are financially unviable and that marketing has taken place. The draft Plan policies allowed for change of use under either criterion. In addition, further changes brought about by the amendment required marketing for sale and for lease, as opposed to either, and increased the period required for marketing from 12 months to 24.

The independent Planning Inspectors, who carried out the public Planning Inquiry into the draft Island Development Plan, recommended that trends in visitor numbers and accommodation occupancy are monitored to assess the continued appropriateness of the visitor accommodation policies in the IDP. Both trends were in decline at the time of the Planning Inquiry hearings. Given the uncertainty about future demand, and the problems arising from a mismatch between supply and demand, the Inspectors considered that keeping the matter under review was very important.

A Supplementary Planning Guidance document was produced alongside the IDP to help with interpretation of the IDP policy requirements for change of use of visitor accommodation to an alternative use.

Tourism Strategy and the 'Potential Economic Benefits of Adopting a More Flexible Approach'

The States resolved[16], in approving the IDP, to direct the Committee *for* Economic Development (C*f*ED) to submit a policy letter to the States of Deliberation setting out a Tourism Strategy for approval by the States by 31 October 2018. Such policy letter was to include:

(a) a review of the Visit Guernsey and Chamber of Commerce Strategic Plan 2015-2025; and,

(b) an assessment of the current stock of visitor accommodation and the stock of visitor accommodation necessary to support the future viability and growth of the industry.

[15] Billet D'Etat XXV & XXVII P.2016/25 Amdt 20 Proposed by Deputy H Soulsby, Seconded by Deputy R Prow

[16] Billet D'Etat XXV & XXVII P.2016/25 Amdt 21 Proposed by Deputy H Soulsby, Seconded by Deputy R Prow

The C*f*ED in its response to consultation as part of the Annual Monitoring Report (AMR) process for the 2017 AMR advised that "the Committee is keen to further investigate the potential economic benefits of adopting a more flexible approach to the change of use of sites to and from visitor accommodation use, but recognises that these must be considered alongside other potential impacts of any proposed policy revision. As directed by the States, the Committee will submit a revised Tourism Strategy to the States by 31st October 2018, which will provide an opportunity to review the appropriateness of these policies".

The C*f*ED, in its Policy Letter "Implementing the States of Guernsey's Economic Development Strategy" in November 2018, gave a commitment to bring a Policy Letter to the States in Q1 2019 with a new tourism strategy, revised to Q2 during the debate, and that the strategy would take account of the strategic review of air and sea links infrastructure that was being co-ordinated by the Policy & Resources Committee (P&RC). Further to this, in February 2019 the Committee President made a statement to the States that "as the recommendations of the [air and sea links] review may fundamentally alter the nature of our visitor market, the review of the tourism strategy was put on hold until we saw the recommendations and outcomes of P&R's review. To the disappointment of the Committee, we have not yet seen that review". A further statement from the Committee President in April 2019 confirmed that "Industry has made it clear that it wants actions and not another strategy, and for that reason the Committee will publish its action plan in Q2 of this year. This action plan will be distilled from the 10-year tourism strategy that was agreed in 2015 with the Chamber of Commerce, and will also include development of new opportunities such as edu-tourism, medical tourism and working with Alderney and Sark".

Also during the States debate in April 2019 the States agreed that the C*f*ED will have responsibility to commission further work on the technical, regulatory, environmental and economic business case for the extension of the airport runway, although the States did not agree to the commissioning of the work. A Policy Letter from the Policy & Resources Committee 'Policy & Resource Plan – 2018 Review and 2019 Updates' will be debated by the States in June 2019. The Policy Letter includes a further update that "a draft review of the Guernsey Tourism Strategic Plan is being developed with the tourism and hospitality industry and will be considered by the Committee during Q2/3 2019. The review of the Tourism Strategic Plan has been put on hold until the recommendations and outcomes of the Policy & Resources Committee's review of sea and air links infrastructure are known".

In its response to the consultation for the AMR the Committee state that "this policy letter has yet to be finalised and Marketing & Tourism has been advised by officers of the DPA that the most likely opportunity for revising the policies of the IDP to take account of any implications of the new Tourism Strategy, when it has been approved, will be at the scheduled mid-term review of the Plan".

The Committee go on to state that "Marketing & Tourism continues to work with stakeholders to explore the potential viability of ideas that might lead to a more "flexible" approach to change of use, both away from and into the visitor accommodation sector. Whilst some of the many ideas mooted have fallen out of consideration as inequitable, impractical or unworkable, this work has identified one mechanism that could facilitate a

more pragmatic and flexible approach to a range of applications. Modification of the Supplementary Planning Guidance published in relation to applications for change of use of visitor accommodation could encompass a new approach to the consideration of viability matters in certain instances. The Guidance interprets how an applicant may go about meeting the requirements of the policy criteria, and clearly any modifications would still need to be compliant with the overall aims of the Plan, and of the policies".

The implications for the policies of the IDP of the propositions in the C*f*ED's policy letter will be considered once it has been debated by the States. Although the IDP only requires a review of housing land supply and employment land supply within 5 years of adoption, the Authority may choose to update other policy areas if monitoring identifies a requirement to do so at the same time. Therefore if any policy changes are required as a result of the States debate then there would be an opportunity at that point to revise policies subject to the evidence available in support of any proposed changes, the findings of Planning Inspectors following the Public Inquiry and approval of the States.

2017 AMR Action Update – the 2017 AMR included an action for the Development & Planning Authority to liaise with the Committee *for* Economic Development at both officer and political levels in the analysis of the implications of a potential change to IDP visitor accommodation policies introducing a more flexible approach. This action continues to be relevant.

Action - the Development & Authority will liaise with the Committee *for* Economic Development at officer level to review the potential and need to amend the Supplementary Planning Guidance where this is possible within the context of the IDP policies.

During the Public Inquiry into the draft IDP a number of owners of visitor accommodation establishments commented that the restriction on change of use under the IDP policies would discourage new investment in their establishments because it limited access to finance. There has been no evidence available to confirm this. In view of this and the comments of the Planning Inquiry Inspectors in their report, the former Environment Department undertook to keep the matter under review, including trends in visitor numbers, and to amend the policy criteria if circumstances change.

The overall trend in staying visitor numbers over the period 2003-2018 is a decrease then a levelling off - see Figure 1 below – with a small decrease in 2018 compared to 2017.

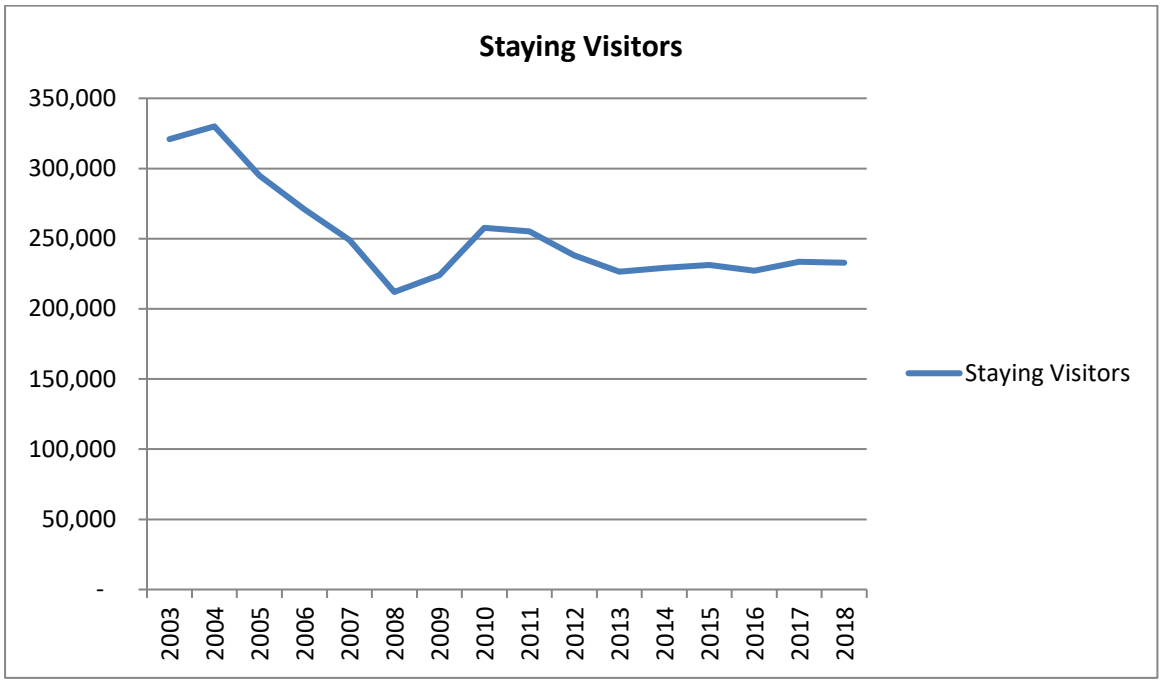


Figure 1: Staying Visitors 2003-2018

2017 AMR Action Update – the 2017 AMR included an action to include trends in occupancy levels of visitor accommodation in future AMRs. These have not been reviewed for this AMR given that this will be pertinent to the States' consideration of the new Tourism Strategy. This may be included in future AMRs depending on the outcome of the States' debate on the Tourism Strategy. For example, significant decreases in both occupancy levels and staying visitor numbers could suggest that the IDP approach of restricting loss of accommodation may be too onerous.

Stock of Visitor Accommodation

The C*f*ED policy letter is also required to include an assessment of the current stock of visitor accommodation and the stock necessary to support the future viability and growth of the industry. The current stock (December 2018) is shown in Figure 2 below. The stock has increased by 7 from May 2018 (reported in the 2017 AMR), with the addition of 1 guest accommodation, 3 self-catering and 3 private dwellings. Private dwellings can operate as bed and breakfast or as a holiday let without requiring planning permission for change of use subject to criteria including use for a maximum of ten weeks over the course of a single year on the proviso that no single let shall exceed 28 days' duration. A permit is required under the Tourist Law. This is a more flexible approach to the use of private dwellings to accommodate visitors introduced in 2018 following discussions between the Authority and C*f*ED.

Type of accommodation	Rating	Number Sites / Establishments	Beds
Guest Accommodation	2 Star	4	65
	3 Star	10	304
	4 Star	14	158
	Waiting Grading	1	**2**
	Total	**29**	**529**
Hotel	2 Star	6	348
	3 Star	21	1546
	4 Star	8	789
	5 Star	1	124
	Waiting Grading	0	**0**
	Total	**36**	**2807**
Self- Catering Accommodation	2 Star	1	4
	3 Star	15	184
	4 Star	40	916
	5 Star	2	10
	Mixed	13	422
	Waiting Grading	1	4
	Total	**72**	**1540**
Private Dwelling	3 Star	1	4
	4 Star	1	2
	States of Guernsey Approved	32	158
	Total	**34**	**164**
Camping	Not regulated by permit under Tourist Law	5	-
	Total	**5**	-
Group Accommodation	Waiting Grading	1	**32**
	Total	**1**	**32**

Figure 2: Stock of Visitor Accommodation

The majority of accommodation of all types is located Outside of the Centres as shown in Figure 3 below.

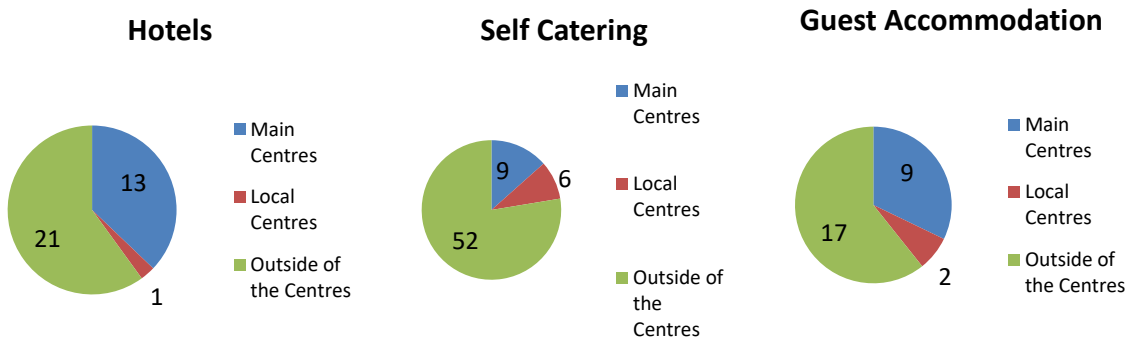


Figure 3: Location of the Stock of Visitor Accommodation

In addition to the active stock of accommodation there are a number of establishments that have closed but have not received planning permission for a change of use. There are 4 hotels from the current stock that are vacant.

Hotel	Beds
Bon Port	38
Captain Cook	55
Le Chalet	80
St Margaret's Lodge	76
Total	**249**

Figure 4: Vacant Visitor Accommodation

The IDP policies allow for smaller establishments to change use away from visitor accommodation. This is where the establishment comprises a single dwelling house with less than 3 self-catering units attached to it or located within its domestic curtilage or a guest accommodation establishment of less than 6 bedspaces that also comprises a single dwelling house where this will revert to a single dwelling house.

Of the current stock of accommodation, 34 self-catering establishments have less than 3 units and 13 guest accommodation establishments are of less than 6 bedspaces and could potentially, if they are a single dwelling, change use away from visitor accommodation, under the terms of the IDP policies.

Planning permissions in 2018
In 2018 there were 39 planning applications relating to visitor accommodation establishments. All were approved.

Hotels: There were no planning applications for new hotels in 2018. There was 1 application determined relating to a change of use of a hotel away from visitor accommodation use. In this case permission was given for the change of use of an annexe and basement to a former hotel to a house in multiple occupation. In normal circumstances such an application would be determined against the relevant policy for visitor accommodation and the associated SPG. However, given the particular history of the property and the fact that the ground and upper floors of the property were legitimately no longer part of the hotel, so that any hotel use would only be within the basement and annexe of the property, it became apparent that using the full force of the Policy to maintain a hotel of such limited quality would not be consistent with the intentions of the policy. On that basis, in this specific case, it was considered that the loss of the hotel use would only represent a minor departure from the IDP, within the terms of Part IV, Section 12(2) of The Land Planning and Development (General Provisions) Ordinance, 2007. The change of use of visitor accommodation policies in the IDP and the associated SPG have not yet therefore been fully tested by planning applications received.

Outline planning permission was granted in 2018 for a development at Admiral Park to vary the conditions of the previous outline approval. The permission includes an increase to the

total permissible gross internal floor area for hotel use from 2000m^2 to 4000m^2, with an associated reduction in floor areas for other uses, primarily office space.

19 planning permissions were granted for works to existing hotels relating to 15 establishments; 3 in St Peter Port Main Centre and the remainder Outside of the Centres. This includes the installation of Occupation Trail interpretation boards at 3 hotels.

Self-catering: There were 5 planning permissions granted in 2018 to create new self-catering accommodation - through conversion of residential outbuildings in 3 cases, conversion of part of a dwelling and conversion of part of hotel. There were 2 permissions to change use away from self-catering, to residential use in both cases. There were 5 planning permissions granted for works to support existing self-catering establishments. All of these sites are Outside of the Centres.

Guest accommodation: There was 1 planning permission relating to guest accommodation in 2018. This was to change the use of part of a dwelling to provide 1 room. The site is Outside of the Centres.

Camping: There were 6 planning permissions granted in 2018 that related to 3 existing and 2 new camping sites – all Outside of the Centres. The 2 new sites are intended to offer "glamping" with 1 operational in 2018. The 3 existing sites all received permission to accommodate motorhomes or touring caravans.

Overall the levels of permissions for the different categories of accommodation is broadly similar to 2017.

INDICATOR – change in the stock of visitor accommodation through planning permissions		
Plan Objective		Plan Objective 3: Support a thriving economy.
Target		No loss of visitor accommodation.
Outcome	2018	Hotels: no change. Self-catering: net increase of 3 establishments. Guest Accommodation: addition of 1 establishment.
	2017	Hotels: no change. Self-catering: net increase of 1 establishment. Guest Accommodation: no change.
Target met?		Yes.
Comments (including any risks to delivery)		There have been no planning applications to date to change use away from visitor accommodation that have triggered use of the SPG, other than some unique circumstances and for small premises below the threshold set in the policies.
Action		None.

Performance of Policies

The IDP policies for change of use away from visitor accommodation use (and the associated SPG) have not yet been tested in part due to the requirement for 24 months active and

appropriate marketing for sale and for lease. The Visitor Accommodation SPG sets out guidance about what the Planning Service generally considers to be appropriate marketing. This would involve:

i. placement for sale and for lease with more than two estate agents including at least one in Guernsey and one in the UK;
ii. active approaches to potential operators; and,
iii. an asking price/rate that is a realistic market rate.

There are currently (as at April 2019) 5 hotels and 4 self-catering establishments on the market. Only 1 establishment appears to be marketed both on Island and in the UK. 4 of the hotels and 2 of the self-catering establishments form part of the active stock of visitor accommodation. This compares to 4 hotels and 8 self-catering establishments on the market in June 2018.

In its response to the consultation for the AMR the Guernsey Society of Architects comments that the requirement to advertise an establishment for sale or lease for a period of at least 24 months is unrealistic and that it is difficult for businesses to obtain finance to invest in the visitor accommodation, especially where there is not a strong balance sheet. Without the potential to change to another use, the underlying assets - primarily the property - cannot be valued on the basis of hypothetical change of use. They suggest "the abandonment of a fixed time period which imposes artificial restrictions that impede an efficient and timely reassignment of land uses. A rational approach could be applied that uses existing and historic evidence to demonstrate the property is not financially viable". This evidence is anecdotal however and the policy requirements will be more appropriately tested through the C*f*ED's consideration of these matters as part of a new tourism strategy.

The IDP policies for change of use of visitor accommodation are intentionally very restrictive and particularly given the changes made by the States through amendment. The C*f*ED noted in response to the 2017 AMR concerns that this is discouraging investment and is considering the implications for a more flexible approach as part of its new Tourism Strategy.

Concerns had been raised previously that policies were discouraging investment. The planning permissions granted in 2018 do indicate that there is some continuing investment in premises - 11 hotels received permission to enhance the facilities they offer, there was permission to create 4 new self-catering establishments and permissions for works to 7 others. In its response to the consultation for the AMR the C*f*ED state that there are ongoing enquiries from potential investors in the sector and these continue to propose ideas for new, alternative and sometimes radical tourism accommodation products that have been launched successfully in other jurisdictions. The Committee note that "these indicate not only a potential appetite for investment, but also that the increased flexibility necessary for them to come to fruition requires a more holistic approach from the States and not one solely based on planning or tourism considerations".

The C*f*ED will need to consider an appropriate range of accommodation to meet the needs of the new Tourism Strategy. It will be important for the C*f*ED to liaise with the Authority at an officer and political level on options for and the implications of, a more flexible policy

approach to the change of use of visitor accommodation and appropriate criteria taking account of the wider objectives of the IDP. The SLUP requires policies to maintain an adequate stock of visitor accommodation to support the future viability and growth of the industry. If the new Tourism Strategy requires amendments to the IDP policy those amendments would be required to be based on sound and robust evidence and would have to be consistent with the SLUP.

A SPG document was produced alongside the IDP to explain in detail the requirements of the IDP policies for change of use of visitor accommodation to an alternative use. No planning applications have been submitted to date that have required the submission of supporting information as referred to in the SPG. The SPG would also be subject to review should the IDP policies be amended.

In all other respects the IDP policies in relation to visitor accommodation are performing as intended and give positive support to existing businesses to adapt or expand their premises as demonstrated by the approval of all 39 applications submitted. The policies allow for smaller premises to leave the industry and there have been some instances of that in 2018.

In the 2017 AMR, the *Cf*ED noted in its response to the Authority that it "is pleased to note that policy OC8(B) concerning the development of campsites has enabled several new initiatives to progress in this area". In 2018 permissions were granted for 2 new campsites, both intended for "glamping", providing the potential for more diversity in the Guernsey offer. IDP Policy OC8(B): Visitor Accommodation Outside of the Centres – Campsites has also continued to provide the flexibility for existing campsites to amend their offer. 3 existing campsites have expanded the capacity to accommodate motorhomes and touring caravans in the Island.

Summary

In conclusion, the IDP policies provide support for a range of new accommodation in Centres and Outside of the Centres and in 2018 planning applications have been received for new self-catering and guest accommodation premises. Until such time as the States has debated the Policy Letter for the new Tourism Strategy, the policies of the IDP effectively deliver the requirements of the SLUP and remain relevant.

Summary of monitoring requirements

- Trends in occupancy levels of visitor accommodation may be included in future AMRs depending on the outcome of the States' debate on the Tourism Strategy.

Summary of action required

- The Development & Authority to liaise with the Committee *for* Economic Development at both officer and political levels in the analysis of the implications of a potential change to IDP visitor accommodation policies introducing a more flexible approach; and,
- The Development & Authority will liaise with the Committee *for* Economic Development at officer level to review the potential and need to amend the Supplementary Planning Guidance where this is possible within the context of the IDP policies.

Social, Community, Leisure and Recreation

Introduction

Guernsey has a wide variety of services and facilities relating to social, community, leisure and recreation uses. This includes medical facilities, churches, community centres, and pre-schools as well as public realm and access to public art and various types of formal and informal recreation and leisure uses. As part of the Annual Monitoring Report (AMR) it is important to monitor any changes within social, community, leisure and recreation uses to ensure the Island Development Plan (IDP) policies are performing as intended and that they remain robust and effective in delivering the land use aims of the States as expressed in the Strategic Land Use Plan (SLUP), and also that an appropriate level of provision is maintained.

Policy Context

The key purpose of the SLUP is to positively contribute to maintaining Guernsey as a desirable place to live, work and enjoy leisure time. This is reflected specifically in Policy SLP10 which states; '*Provision should be made in the Development Plans to enable the provision of an adequate range of community, social and leisure facilities to be developed according to need and demand whilst maximising the use of existing sites*'. The SLUP recognises the importance of leisure and recreation and access to a range of social and community facilities to the quality of life for Islanders and the importance of these aspects are acknowledged by the States in several of its 22 priorities as well as the 20 year vision of the Future Guernsey Plan. The SLUP directed and informed IDP Policies.

There are six Plan objectives of the IDP which together deliver its Principal Aim. IDP Objective 4: Support a healthy and inclusive society highlights that an important aspect of a high quality of life is access to a range of social, community, leisure and recreation services and facilities, recognising that provision of adequate facilities is fundamental to the health and well-being of the Island community. There are 12 policies within the IDP which are directly applicable to social, community, leisure and recreation uses[1]. These are policies; MC3, MC9 (A) MC9 (B), LC3(A), LC3(B), LC7(A), LC7(B), OC2, OC4, OC7, OC9 and GP18. The IDP policies reflect the spatial strategy, as set out in the SLUP and there are therefore different policies for proposals in the Main Centres, Local Centres and Outside of the Centres, as well as a general policy which is not linked specifically to spatial designation.

There is general policy support for providing new and maintaining and enhancing existing services and facilities as well as making the best use of existing sites in and around the Main Centres for social, community, leisure and recreation uses. If an existing social, community, leisure or recreation use wishes to change to an alternative use, the proposal would be supported providing that the existing facility can be adequately replaced on an appropriate site within or around the Main Centres concerned or that it is demonstrated that it is no longer required and that there would be no significant detrimental impact on the vitality of the Main Centre or Main Centre Outer Area as a result of the change of use.

[1] Definitions are provided at the end of this thematic report.

Development proposals for providing new, maintaining and enhancing existing services and facilities as well as making best use of existing sites in and around Local Centres for social, community, leisure and recreation uses will generally be supported providing that development is of an appropriate scale and would not undermine the vitality of the Main Centres. Change of use is also supported when it is demonstrated that the existing facility can be adequately replaced in the Local Centre concerned, or that it is no longer required and there is no unacceptable impact on the vitality of the Local Centre.

Applications for new social and community facilities Outside of the Centres will only be permitted in accordance with policy GP16(A) and GP16 (B), the conversion of a redundant building. Alterations and redevelopment of existing social and community facilities will be supported where proposals do not undermine the vitality of the Centres. Change of use away from social and community uses will be supported where it can be demonstrated that the facility is no longer required.

To support the spatial strategy approved through the SLUP, Outside of the Centres, development providing new formal leisure or indoor formal recreation will be supported only when it can be demonstrated that there is demand for the facility and there are specific operational or locational requirements that would prevent the use of a site within a Centre and the proposal would not negatively impact on the vitality of a Centre. Proposals to extend or redevelop existing formal leisure or indoor formal recreation will be supported depending on scale and impacts on the vitality of a Centre.

Development to provide new facilities or to extend, alter or redevelop existing facilities for outdoor formal recreation or informal leisure and recreation will be supported providing that proposals are proportionate, respect the character of the locality and the site could not positively contribute to agricultural use (in the Agriculture Priority Area). Change of use of existing leisure and recreation facilities to other uses will be supported where it is demonstrated that the existing facility can be adequately replaced on an appropriate site or that it is no longer required.

For redundant glasshouse sites Outside of the Centres, proposals for outdoor formal recreation or informal leisure and recreation will be supported in principle if proposals are in accordance with Policy OC9: Leisure and Recreation Outside of the Centres and meet the criteria in Policy OC7: Redundant Glasshouse Sites Outside of the Centres. Proposals must also accord with all relevant policies of the IDP.

In regards to Public Realm and Public Art, it is expected that applicants consider the relationship of a proposed development with the public realm and where appropriate, proposals will be encouraged to contribute to the enhancement of the public realm adjoining a development site. Developments within areas of the public realm will be expected to enhance the character and functionality of a locality for the public benefit. The inclusion of public art is encouraged under the policies of the IDP.

Planning Permissions

In 2018, there were a total of 67 planning decisions which related to social, community, leisure and recreational uses. In 2017 there were 39 planning decisions relating to social, community, leisure and recreation uses, which is considerably lower than in 2018.

There were a total of 32 planning decisions which, for monitoring purposes, related to social and community uses. This includes 1 refusal. There were no decisions which resulted in the loss of social and community uses but which met the tests of the relevant IDP polices. Comparing this with data from 2017, where there were 17 planning decisions related to social and community uses, including 2 refusals and 3 decisions which resulted in the loss of social and community uses.

In 2018 there was one planning permission granted which was considered as both social, community, leisure and recreation use.

There were 34 planning decisions that related to leisure and recreation facilities in Guernsey, all of which were granted planning permission. There were no refusals and there was 1 loss of leisure and recreation facilities which met the tests of the relevant IDP policies.

There were 4 planning permissions granted relating to public art, which is encouraged through Policy GP18: Public Realm and Public Art.

The majority of planning permissions granted were for minor development and therefore there are no further conclusions to be drawn regarding these application statistics.

There were no applications for leisure or recreation uses relating to Policy OC7: Redundant Glasshouse Sites Outside of the Centres.

Temporary Planning Permissions

A number of temporary permissions were granted in 2017 for leisure and recreation and public art uses, with no temporary permissions for social and community uses. Around half of the leisure and recreation permissions were annually recurring permissions. However in 2018 there were very few temporary permissions granted, 5 in total. This is an indication that there is not a trend for temporary planning permissions relating to leisure and recreation and public art.

Losses of Social, Community, Leisure and Recreation Facilities

There was only one loss of leisure and recreation facilities in 2018. This was the change of use of a site from a putting green, to domestic use. It was accepted that this leisure and recreation use was no longer required. There were no losses of social or community uses in 2018.

The IDP policies for social, community, leisure and recreation uses appear to be performing as intended, allowing for new developments whist supporting existing facilities; however, the number of planning applications received in relation to these uses is not significant enough to be able to fully determine the effectiveness of the IDP Policies. With further

monitoring, trends can be identified and the effectiveness of policies can be assessed more comprehensively.

The IDP seeks to protect social, community, leisure and recreation uses and facilities, and a change of use resulting in the loss of these uses will only be supported where it can be demonstrated that a facility is no longer required and that there would be no unacceptable impacts on the vitality of the Main Centres. Paragraph 8.1.8 of the IDP states that further guidance on how to demonstrate the re-provision of a facility and how to demonstrate that a facility is no longer required will be provided by the Authority and this is achieved through the pre-application advice the planning service offers.

2017 AMR Action Update – the 2017 AMR had an action for guidance to be published in order to provide further information on the supporting evidence required to demonstrate re-provision of a facility or that a facility is no longer required. The Planning Service provides this guidance through the pre-application process which is proportionate to the limited number of applications received and further published guidance is not necessary at this time.

Public Realm and Public Art

There were 4 planning permissions granted in 2018 for public art. This included 2 temporary exhibitions, a memorial stone and the display of a donkey statue.

The importance of Policy GP18: Public Realm and Public Art, has been highlighted in published Development Frameworks. In 2018 there were 2 planning permissions for sites with a Development Framework. Neither of the developments subsequently approved included public art as encouraged by the approved Development Framework. The inclusion of public art is a mechanism to ensure the delivery of public benefits through the development of the site.

The levels of provision of public art in development approved on sites with Development Frameworks will be monitored and there is likely to be increased opportunity for public art and public realm improvements particularly through any local development strategy for the Harbour Action Areas and Development Frameworks for Regeneration Areas.

Action – monitor the level of provision of public art in development approved on sites with Development Frameworks.

Health & Social Care

The Committee *for* Health & Social Care's (C*f*H&SC) highlighted support of IDP Policies which help to maintain and create a socially inclusive , healthy and economically strong Island.

The Hospital Modernisation Programme for the Princess Elizabeth Hospital (PEH) site was approved by the States of Deliberation in March 2019. This is a ten year phased project to modernise the PEH, in support of the Partnership of Purpose.

In regards to Community Hubs, the programme has undergone a redesign and the previous Programme Business Case will undergo significant rework, and a new board is being formed

to assure this. The aim is to consolidate the C*f*H&SC community services to a single site and move staff out of several other properties which are no longer suitable for the types of services now being offered and could be released to raise further capital.

The Authority will continue to work in partnership with the C*f*H&SC in regards to the land use requirements for the modernisation of the PEH and any other relevant projects.

Education

During 2017 there were calls for the secondary and post 16 education system to be restructured. In January 2018 the States agreed that the 'Alternative Model' would be the best approach. The outcome of the debate was that, from the earliest practicable date, secondary and post 16 education should be as follows:

- Two 11 to 18 colleges or campuses, operating as one organisation, each with a principal but led by an Executive Head Teacher and a single Board of Governors;
- The College of Further Education operating as one organisation providing vocational, professional and technical education for full-time and part-time students, including apprentices, with the objective of integrating with the Institute of Health and Social Care Studies and the GTA University Centre as soon as practicable;
- St. Anne's School in Alderney; and,
- Le Murier School and Les Voies School operating as Special Schools for students with special educational needs.

The restructuring of the secondary and post 16 education system could have wide implications for the Island including land use. The policies in the IDP allow for the principle of education related development either through the policies relating to social and community facilities or through Policy S5: Development of Strategic Importance or S6: Strategic Development Opportunity Sites. Nevertheless it is important to closely monitor the implementation of the new system and engage in early dialogue between the Authority and the Committee *for* Education, Sport & Culture (C*f*ES&C) with regards to land use requirements and to monitor the effect that this could have in regards to the effectiveness of social and community policies in the IDP to deliver the directives of the States.

In its response to consultation for the AMR the C*f*ES&C noted that the work on the new school structure is being progressed. In October 2018 the C*f*ES&C announced that St Sampson's and Les Beaucamps school sites will be used for the new 11-18 colleges. The Authority will continue to communicate with C*f*ES&C regarding the progression of the new education system.

Sports Strategy

In Q2 of 2018 a consultation regarding the Sports Strategy was opened by the C*f*ES&C. In Q3 2018 an overview of the consultation on 'A Plan for Sport' was published. The C*f*ES&C aim to take the Sports Strategy to the States of Deliberation for approval in 2019. The outcomes of the States debate will be considered in relation to any implications for land use policy and for future monitoring.

Harbour Action Areas

There are Harbour Action Areas (HAA) in both St Peter Port and St Sampson/Vale. Both HAAs fall within the Seafront Enhancement Area with a focus on St Peter Port HAA through the priorities set out in the Future Guernsey Plan. The principal aim of the Harbour Action Areas is to make the most of two of the Island's strongest natural assets, providing for the safe functioning of the commercial ports to modern standards whilst drawing in economic contributions which in turn will secure improved infrastructure, commercial, leisure and recreation opportunities, enhancing the environment and reducing the negative impacts of traffic. From a strategic perspective, the Harbour Action Areas are discussed in the Strategic Development and Infrastructure report.

Any developments within the Harbour Action Areas will be monitored and any changes to provision of leisure and recreation facilities will be assessed.

Coastal Areas

The SLUP notes that the coast provides livelihoods to many who operate coastal restaurants, outdoor recreation facilities and informal leisure. The SLUP requires the IDP to give particular regard to maintaining the coastline as an environmental, economic and recreational resource whilst responding to certain issues. The IDP supports the use of coastal areas in policies OC4 and OC9. Policy OC4 recognises that convenience retail can support the recreational enjoyment of a coastal location, whilst Policy OC9 recognises that the coast provides important leisure and recreational areas. In 2018, planning permission was granted for temporary leisure and recreation uses in coastal areas. Given the limited number of applications to date, further monitoring is required to assess the effectiveness of IDP policies to support the recreational use of coastal areas while ensuring the attractive character and important natural environment of the coastal areas is protected and, where appropriate, enhanced.

Summary

There is insufficient data at this stage to assess any trends in the level of provision for the range of social, community, leisure and recreation uses considered in this report. Continued monitoring is needed over a longer period of time to be able to assess how the policies of the IDP are performing and to fully assess how effective they are at delivering the SLUP requirements and States' priorities.

The SLUP states that community, social and leisure facilities should be developed according to need and demand whilst maximising the use of existing sites. Whilst the planning applications submitted in 2018 relating to social, community, leisure and recreation facilities do not show a significant rise in demand and do not suggest that the IDP policies are not effective, there is limited evidence regarding the level of need and demand for these facilities and uses.

Action - Further research is required to establish a detailed baseline of the current provision of social, community, leisure and recreation facilities throughout Guernsey and further dialogue with the C*f*ES&C and C*f*H&SC to establish levels of need and demand.

This action will allow assessment of the future requirement for these uses in terms of land use and provide evidence on the effectiveness of the IDP policies to deliver development to address identified needs and demands.

For future monitoring of the effectiveness of policies to provide social and community and leisure & recreation facilities in Guernsey it would be informative to talk to local communities in order to establish more qualitative data. This would provide greater insight into the performance of the policies whilst also giving us a greater understanding of the public's view point.

Action – Development & Planning Authority to investigate options to talk to local communities in order to establish more qualitative data regarding social and community and leisure & recreation facilities in Guernsey.

The Committee *for* Economic Development are working on an action plan for tourism. The implications of this for IDP policies for social, community, leisure and recreation uses will be considered if appropriate in future monitoring.

Notwithstanding the above and the lack of data at this time the IDP policies generally appear to be effective in delivering the aims of the SLUP and research has not identified that IDP policies are hindering any development required to address the strategic priorities of the States.

In regards to the public art aspect of Policy GP18, it appears that the policy may not have been applied as it should and the implementation of the policy requires further monitoring.

Summary of monitoring requirements

- Monitor the level of provision of public art in development approved for sites with Development Frameworks;
- Further research is required to establish a detailed baseline of the current provision of social, community, leisure and recreation facilities throughout Guernsey and further dialogue with the C*f*ES&C and C*f*H&SC to establish levels of need and demand; and,
- Development & Planning Authority to investigate options to talk to local communities in order to establish more qualitative data regarding social and community and leisure & recreation facilities in Guernsey.

[1] Social & Community uses include: medical centres, hospital, surgeries, clinics, churches, community centres, clubs, public meeting rooms, premises relating to the provision of emergency services, schools, pre-schools.

- Outdoor formal recreation uses include: sports pitches, outdoor activity centres, equestrian related activities, motor sports, La Vallette bathing pools, outdoor bowls, rifle ranges, play areas- including outdoor facilities provided at Beau Sejour and Delancey Park.
- Informal leisure & recreation uses include: civic spaces, informal event spaces, nature walks, woodlands, cliff paths, parks and formal gardens, allotments and development ancillary to beaches and the coast.
- Indoor formal recreation uses include: leisure centres, sports halls, swimming pools, indoor equestrian centres, gymnasiums and recreational facilities.
- Formal leisure uses include: cinemas, museums, formal events/performance spaces, theatres, conference facilities and casinos.

Main Centres

Introduction

The spatial strategy of the Strategic Land Use Plan (SLUP) is to concentrate development within and around the edges of the urban centres of St Peter Port and St Sampson/Vale. As such, Town and the Bridge are to be maintained as the Island's main economic centres and as attractive places to live, work and spend leisure time (policies LP6: Main Centre Vitality and Viability – Business; LP7: Main Centre Vitality and Viability – Living; LP8: Main Centre Vitality and Viability – Leisure) with Town as the principal centre.

The main centre policies in the SLUP focus on enhancing vitality and viability of Town and the Bridge by encouraging a wide range of retail, commercial, leisure, business, culture and arts facilities, as well as residential uses. Emphasis is placed on respecting the historic character as well as on improving public space, balanced with making provision for appropriate development to ensure the main centres are able to accommodate the needs of modern commercial operations. Re-use of vacant buildings and improving pedestrian and cycle access are also policy objectives (LP9: Main Centre Vitality and Viability – Delivery).

The majority of new housing development on the island is to be within and around the main centres of St Peter Port and St Sampson/Vale and there is a requirement for provision to be made for new large floorplate comparison retail development within Town and the Bridge (policies SLP15: Building sustainable communities (location of development); SLP5: Retail Development). Policies also encourage the refurbishment and reuse of office stock in the main centres (SLP2: Office Development) with new office development also supported at Admiral Park (SLP1: Office Development).

These themes are reflected in the Island Development Plan (IDP) where policies seek to concentrate the majority of new development in the Main Centres and Main Centre Outer Areas, placing an emphasis on maintaining and enhancing the vitality and viability of these two Main Centres. Generally development which supports these Centres as vibrant mixed-use areas is supported whilst there is a presumption against development which would negatively affect their vitality and viability.

The main spatial emphasis of the IDP is to focus development within the Main Centres, although development will generally be supported in the Main Centre Outer Areas where it would not detract from the objective of ensuring the Main Centres remain the core focus for economic and social growth. Policies promote a diverse mix of uses, retention of social and community facilities, and the most effective and efficient use of land to accord with Plan Objectives 1, 2, 3, 4, 5 and 6. In accordance with the SLUP, the two Main Centres are St Peter Port and St Sampson/Vale (Town and the Bridge).

Returning to the theme of vitality and viability, the IDP states that the concept of vitality and viability is central to maintaining and enhancing town centres. It will depend on many factors, including the range and quality of activities in a centre, its mix of uses, its accessibility to people living and working in the area and its general amenity, appearance and safety. Generally speaking, vitality is considered to be a measure of how busy a centre

is, whereas viability is a measure of its capacity to attract ongoing investment, its importance, and the ability to adapt to changing needs.

Both vitality and viability will depend on factors such as:

- The diversity of uses and purposes within the centre;
- The level of footfall and the accessibility of the centre;
- The level of occupied versus vacant space;
- The quality of buildings and space; and,
- The popularity of the centre with those who live, work or visit there.

Monitoring of vitality and viability should ideally therefore encompass both quantitative and qualitative data.

A survey is undertaken annually to record information within the Main Centres and Main Centre Outer Areas, and the 2018 survey data has informed this report along with information on planning approvals and other relevant data. This survey was published in full in May 2019[1]. The survey includes gathering information on different uses, building conditions and opening hours and is used to record change in the Main Centres and Main Centre Outer Areas year to year.

Of the 22 priorities set out in the Future Guernsey Plan, several are relevant to the Main Centres, for example any spatial requirements related to supporting the finance and tourism sectors and diversification of the economy; the expansion of sea links; the Harbour Area Enhancement (now Seafront Enhancement Area); Health and Wellbeing (particularly as it relates to Active Travel, leisure, recreation, social and community provision); Long Term Infrastructure Investment plan; Disability & Inclusion Strategy; and Affordable Housing.

Within the Main Centres there are several further policy designations which guide development, and as such this report focuses on evidence on the Core Retail Areas, Regeneration Areas, Main Centre Inner Areas and Main Centre Outer Areas, with a brief summary of the Harbour Action Area (HAA) designations (the HAAs are described in full in the Strategic Development and Infrastructure report). Other designations include Important Open Land (IOL) and Areas of Biodiversity Importance (ABI) – these designations are discussed further in the Natural Resources thematic report.

The Committee *for* Health & Social Care (C*f*H&SC), in its feedback for the AMR 2018 emphasises the relationship between the physical environment and health, noting that poor housing, deprived neighbourhoods and a lack of green space can impact negatively on both physical and mental health. Furthermore, the C*f*H&SC notes that the creation of physical environments where people can live healthier lives with a greater sense of wellbeing greatly reduces health inequalities. This principle is reflected in the IDP objectives (Plan Objective 4), and policies, for example through the designation of Important Open Land to protect and enhance the openness, landscape character and visual quality of these areas, and through the spatial strategy of focusing development in the Main Centres whilst supporting Local Centres as socially inclusive, healthy and sustainable communities.

[1] The full Main Centre Survey 2018 can be viewed here: Main Centres Survey 2018

Feedback for the 2018 AMR from the Committee *for* Economic Development (C*f*ED) explained that the C*f*ED has now prepared a draft Retail Sector Policy Statement, on which consultation took place in early 2019. More detail is contained in the C*f*ED response in the Appendix to the AMR and throughout the relevant sections of this report.

In terms of broad improvements to the accessibility of the Main Centres, as described in the feedback from the Committee *for the* Environment & Infrastructure, 2018 saw consultation on extending the 25mph speed limit for community hub areas to broadly cover all Main Centre Outer Areas (and Local Centres) as defined in the IDP. The new speed limits were introduced on Sunday 7th April 2019. Additionally, there is a continued upward trend in bus passenger numbers including amongst the local population, which reflects well on the implementation of the Integrated Transport Strategy (ITS), on accessibility (including accessibility of the Main Centres) and on the effective and efficient use of land where it impacts on reduced demand for car parking. More information on projects related to the implementation of the Integrated Transport Strategy are included in the C*f*E&I response which is appended to the AMR, and also within the Main Centres Survey Report 2018.

The C*f*E&I welcome the support that the IDP policies generally give to the ITS, but would welcome closer working at staff level to facilitate the implementation of individual elements such as travel plans, access plans and measures to encourage active travel. This is noted and included as an action in this AMR where it relates to the remit of the Planning Service and mandate of the Authority as appropriate (see the Public and Private Parking Thematic Report).

Town and the Bridge each have their own unique character which reflects both their more recent but also their historic roles on the Island. Particularly in St Peter Port, the character is underpinned by the attractive historic environment, which is in itself a major attraction of the Island. The IDP aims to balance the conservation of the historic environment with promoting economic investment and careful consideration will be given to the economic and social value of proposed development and its contribution to enhancing the vitality of the Main Centres. These two factors are not mutually exclusive, however, and particularly in the Regeneration Areas, a co-ordinated, focused and positive approach to development aims to attract inward investment in the Main Centres to provide economic, social and environmental improvements, informed by understanding the character and quality of the built heritage.

Figures 5 and 6 at the end of this report show the location of relevant planning approvals in the Main Centres and Main Centre Outer Areas. Rather than showing every approval, which would include a great many householder approvals and minor works, the relevant applications are those which relate to:

- Commercial uses (such as retail, office, storage, industrial) or home working but excluding minor approvals such as those relating to signage, fencing or electrical installations;
- Social, community, leisure and recreation uses (again excluding minor works);
- Improvements to public realm or accessibility; and,
- Changes of use.

These broad categories of applications are useful to focus upon and they most closely relate to the purposes of the Main Centre and Main Centre Outer Area policies.

Core Retail Areas

A Core Retail Area has been identified within each of the Main Centres, which are areas within which planning policy favours the retention of retail uses and the addition of new shops over other town centre uses. As such, within the Core Retail Area, change of use away from retail at ground floor level will only be acceptable where the proposed new use will maintain and enhance the vitality and viability of the Core Retail Area. On upper floors, change of use away from retail is generally supported where the proposed new use would contribute to the vitality and viability of the Core Retail Area (Policy MC6: Retail in Main Centres).

Feedback for the 2018 AMR from the C*f*E&I includes details on planned improvements to the public realm, including at North Plantation (partly within the Town Core Retail Area and partly within the Lower Pollet Regeneration Area) which will see vehicular access to the road restricted after 10am until 3am to improve road safety, allow the area to become predominantly pedestrianised and allow for additional al fresco dining. Other improvements include those recently implemented on a section of Market Street, which incorporate revised traffic management arrangements in the area to make is safer for pedestrians and resurfacing of the road in accessible granite.

In addition, it is the intention that in the future the C*f*E&I will look at making pedestrian/public realm improvements in the Lower Pollet and Church Square.

The 2018 Main Centres Retail Survey recorded the following distribution of uses at ground floor level of the Core Retail Areas of Town and the Bridge, including vacancies. For clarity, the breakdown of uses does not necessarily indicate the legal use class assigned to a unit, but follows a general categorisation which reflects the Use Classes Ordinance 2017. This is because the use of each unit is ascertained during the site survey, and not through assessment of planning application data, and is based on the perceived primary use on site. It is also based on the number of units in each use, not the number of occupiers (so for example some occupiers may take up more than one unit, such as Burton clothes shop in Town).

This found the following balance of uses by percentage in each centre, as shown in Figures 1 and 2 below.

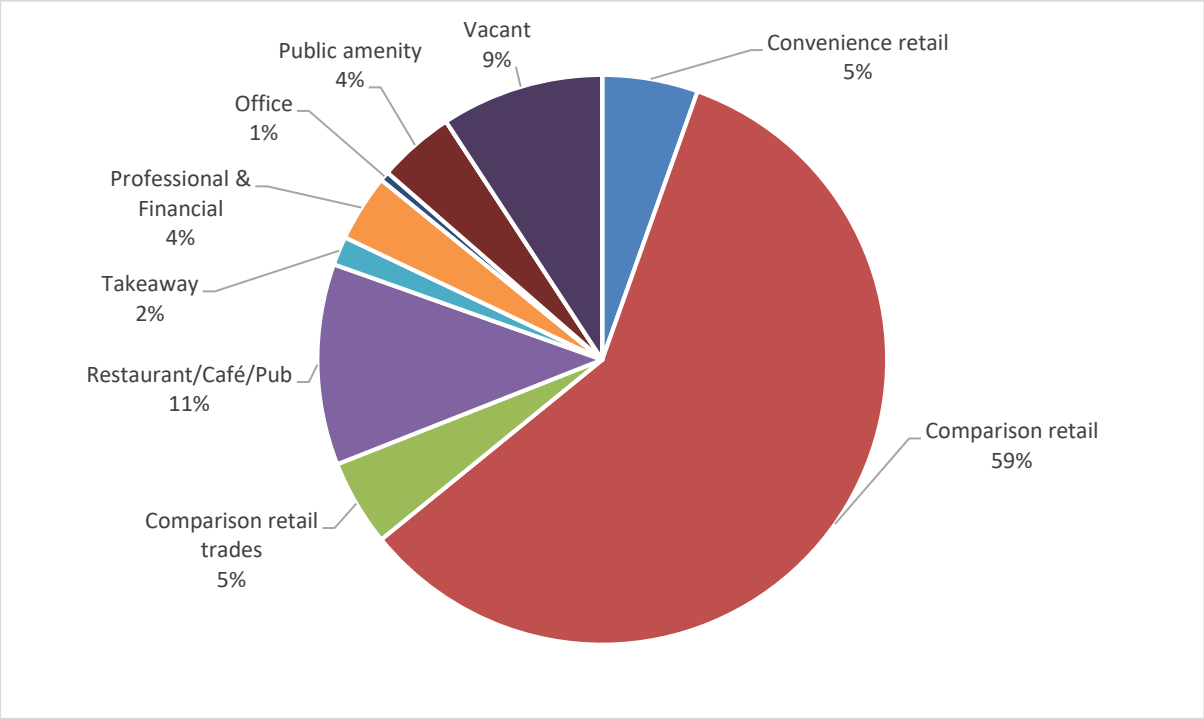


Figure 1: Percentage of ground floor units in each use within the Town Core Retail Area 2018

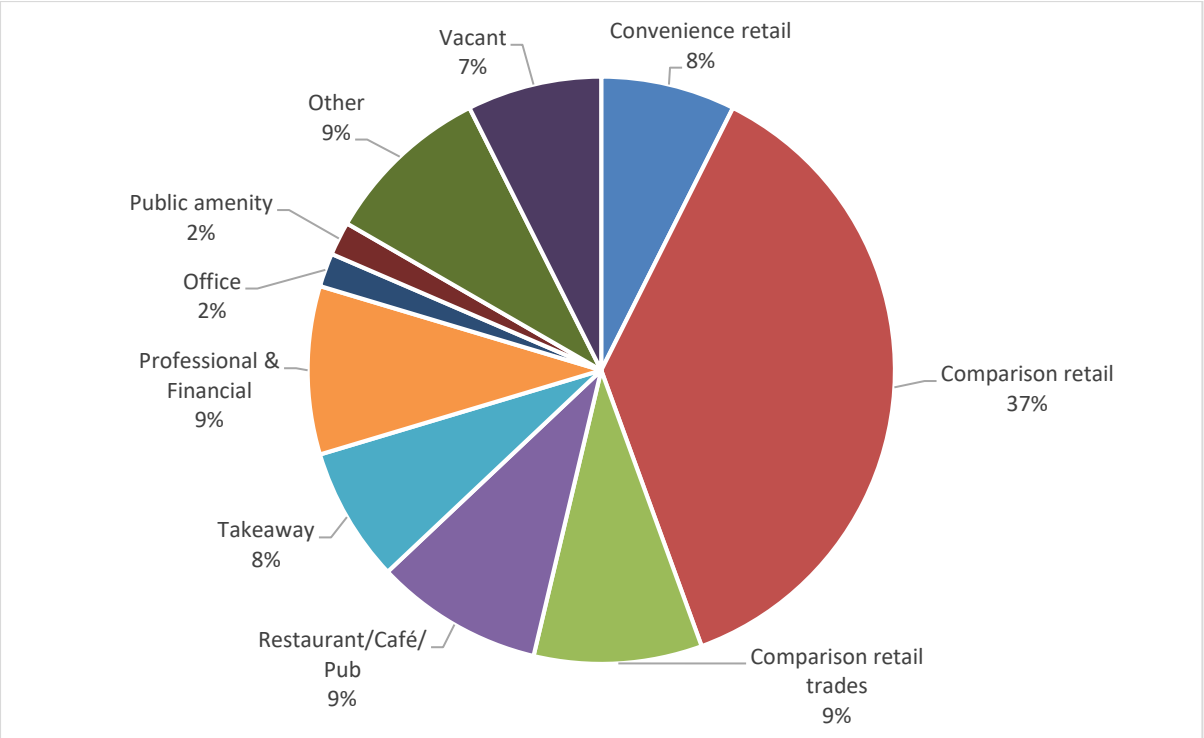


Figure 2: Percentage of ground floor units in each use within the Bridge Core Retail Area 2018

As shown, the ground floor units in the Core Retail Areas (CRA) are predominantly comparison retail, with a smaller element of comparison retail trades and convenience

retail[2]. With convenience and comparison together (including trades), the ground floor uses of the Town CRA are made up of 69% retail (compared to 68% in 2017). Retail uses also remain dominant in the Bridge CRA, although an increase in vacancies has resulted in a reduction in the percentage of units in active retail use, from 60% in 2017 to 54% in 2018. As the total number of units in the Bridge Core Retail Area is relatively small, this equates to a change to just 4 units. The majority of units are still either in active retail use or in retail use but vacant. The combined total of units either in active retail use or vacant but last in retail use is 61%.

As found in 2017, the Town CRA has a higher proportion of restaurants, cafes and pubs (11%) compared to 9% at the Bridge CRA. There are more takeaways in the Bridge CRA (8%) compared to Town CRA (2%). Vacancy levels have increased in the Town CRA from 5% in 2017 to 9% in 2018, and within the Bridge CRA vacancies have risen from 5.5% in 2017 to 7% in 2018. Vacancies will continue to be noted annually in the survey, however as this is a snapshot in time, it does not capture all information on vacancies throughout each year which are known to fluctuate. For example since the survey was undertaken, several of the vacant units within the Town CRA have been occupied, but several others have become vacant.

The 'Other' uses in the Bridge Core Retail Area refer to storage and industrial uses, located on Commercial Road and Bridge Avenue.

In the 2018 Retail Survey the Goad classification system was used to assess the range and variety of shops on offer in Town and the Bridge. To ensure the data is comparable with town centres elsewhere, the classification system was applied to the main retail areas of Town and the Bridge, extending beyond the Core Retail Areas and capturing parts of the Main Centre Inner Areas as relevant. The Goad categorisation system is a recognised method of categorising different comparison retail uses and was used by Roger Tym & Partners in the 2010 Retail Study in Guernsey.

Within Town, the breakdown of information using the Goad classification indicated a diverse retail offering, with 27 of the categories out of 30 represented. The categories which are not represented are Building Societies, Bakers and Greengrocers & Fishmongers, suggesting perhaps that there could be scope for additional convenience retail in Town which reflects the findings of Roger Tym & Partners in their 2010 Retail Study.

Within the Goad area for Town as a whole, the 'Hot Food Takeaway, Sandwich Shops, Cafes & Restaurants' category has the highest representation, with approximately 17.9%. Vacancies represent the next largest percentage, with approximately 12.1%. This figure is higher than that for the Town Core Retail Area, as for the purposes of the Goad categorisation the area to which Goad has been applied includes areas such as Mill Street, Fountain Street, Le Bordage and Lower Pollet where there are multiple vacant units. The UK

[2] 'Comparison' retail is the selling of goods including clothing and footwear, furniture, furnishings and household equipment which generally involves comparing similar goods before buying. 'Convenience' retail is the selling of, often essential, daily items such as fresh produce and food and drink. Comparison retail trades include hairdressers, travel agencies, beauty salons, for example.

Town Centre average vacancy rate for the second half of 2017 was 11.2%[3]. For comparison, at the time of the last comprehensive Goad survey of Town, as part of the Roger Tym & Partners Guernsey Retail Study, 2010, 14.6% of units were recorded as vacant, compared to the UK average of 11.4%, representing an improvement locally and a smaller improvement nationally.

At the Bridge, again there was a diverse range of retail uses, with 22 retail types represented out of 30 categories, compared with 27 categories represented within the main retail areas of Town.

'Hot Food Takeaway, Sandwich Shops, Cafes and Restaurants' have the highest representation overall (consistent with Town), and 'Charity Shops, Pets and Others' also having significant representation on the Bridge (in contrast to Town). Vacancies made up 11.1% of the units in the main retail areas of the Bridge, which is lower than both Town and the UK average (12.1% and 11.4% respectively). The Roger Tym & Partners Study 2010 found a vacancy level of 8.57% based on their study area, however the study area is not defined in their reporting and so it is unclear if the results are directly comparable. However it is set out in Appendix 1 of the Roger Tym & Partners Study that there were 6 vacant units out of a total of 70 surveyed, compared to 8 vacant units out of 72 surveyed in the Goad categorisation section of the 2018 Main Centres Survey.

A full breakdown of the Goad categorisation and further detail on the Core Retail Areas can be found in the Main Centre Survey 2018 (published May 2019).

In terms of planning applications within the Core Retail Areas, in 2018 there were two decisions (both approvals) for minor works within the Bridge Core Retail Area, one for the installation of signage on a retail unit, and one for the installation of a retractable awning at a retail unit. Both of these applications also fell within the St Sampson/Vale Harbour Action Area and Leale's Yard Regeneration Area, but given their minor nature it was determined that these proposals would not prejudice the outcomes of any future Local Development Brief or Development Framework relating to the designations.

Within Town, 26 applications were determined within the Core Retail Area, all of which were approved.

10 of these approvals were for minor works such as those relating to Protected Buildings including new signs and the installation of ventilation systems.

6 approvals related to the refurbishment of 29-31 High Street (Balthazar) on both the High Street side and Quay side (west and east elevations). These approvals included works such as signs, changes to fenestration, installation of a ventilation system and changes to access.

3 approvals related to improvements to the public realm – the removal of the plastic planters outside Sports Direct and their replacement with traditional cast iron bollards; the

[3] From House of Commons Briefing Paper: Retail Sector in the UK. October 2018: https://researchbriefings.parliament.uk/ResearchBriefing/Summary/SN06186

replacement of outdoor lights (catenary wires and lighting) in Market Square; and works to the Pier Steps to provide slip resistance for pedestrians. These were facilitated by policies including GP18: Public Realm and Public Art, GP4: Conservation Areas, GP5: Protected Buildings and GP6: Protected Monuments.

Several approvals (including the lighting noted above) related to the Market Buildings, which included the following:

- Change of use of units 6 &7 from Use Class 11 (sale of food) to Use Class 10 (General Retail), glaze existing arches adjacent to units 5, 6 & 7 and internal alterations (Protected Building) (increase of 54m^2 convenience retail and 136m^2 of General Retail, loss of 100m^2 food and drink);
- Installation of external food and drink kiosk with glazed canopy on Market Terrace adjacent to Market Buildings (addition of 43.7m^2 floorspace);
- Change of use of Inner Street to mixed use convenience/comparison/food retail (comprising uses falling within Retail Use Classes 9, 10 & 11) and installation of trading stalls, public seating, mezzanine, staircase and lift (Protected Building) (relating to approximately 300m^2 of floorspace); and,
- Change of use of basement void to toilet facilities for public access, and alterations to staircase (Protected Building).

A further 3 approvals related to the change of use of buildings:

- Change of use of ground and first floors from office to retail and associated healthcare services (a change of 230m^2);
- Change of use from Retail Use Class 9: Convenience Retail to Retail Use Class 12: Hot Food Take-Away (a change of use of 70m^2); and
- Change of use from use class 10 (General Retail) to use class 11: food - use as a café (a change of use of 55m^2).

Overall there was an increase of approximately 295m^2 in retail floorspace and an increase of approximately 70m^2 of floorspace relating to food and drink, plus the change of use relating to the Inner Street of the Market Buildings which relates to approximately 300m^2 of floorspace. This could potentially contribute to additional convenience retail floorspace which analysis of the Goad data suggests there may be scope for.

Of the approvals within the Town Core Retail Area, 12 were also within the St Peter Port Harbour Action Area (including the 6 applications relating to 29-31 High Street). None of the proposed works associated with those approvals would conflict with the aims and objectives of Policy MC10 with regards to the HAA.

In view of the above approvals, it appears that the Retail in Main Centres policy (Policy MC6) as it relates to the Core Retail Areas continues to function as intended. These are all proposals likely to increase vitality and viability of the Main Centres and the Core Retail Areas, and particularly in relation to the Market Buildings, the objective is to create a vibrant experience with improved facilities for shoppers (toilets and seating, for example) In addition, Policy GP18 relating to Public Realm provided support for public realm improvements.

In Summary, within the Core Retail Areas there are low vacancy levels at ground floor though vacancies have increased in both the Town Core Retail Area and the Bridge Core Retail Area. Vacancies in the wider St Peter Port 'town centre area' appear to have fallen since the Roger Tym & Partners study in 2010, though the results for the Bridge 'town centre area' are less clear. Planning approvals in 2018 resulted in an increase in retail floor space of approximately 295m^2 at ground floor level in Town.

There is no updated Retail Study at present but overall the Core Retail Areas appear to be functioning at the correct levels and there is no evidence forthcoming to indicate their extent needs to be amended, although liaison with the C*f*ED will continue including in relation to the emerging draft Retail Sector Policy Statement.

2017 AMR Action Update – the 2017 AMR include an action for the Development & Planning Authority to continue to liaise at officer level with the Committee *for* Economic Development in connection with updating the Retail Study. This action is carried forward as: The Development & Planning Authority to continue to liaise with the Committee *for* Economic Development at officer level in connection with updating the Retail Study and with regard to the emerging Retail Sector Policy Statement.

Consistent with the 2017 AMR, a target of 60% retail uses in the Core Retail Areas is suggested as a guide, though an updated Retail Study could influence this, as this relates to the UK average of 44% retail uses, excluding comparison retail trades. Vacancies will continue to be monitored in the annual Main Centres Survey as will the diversity of uses in the wider 'town centre' areas.

2017 AMR Action Update – the 2017 AMR Action to monitor additional measures of vitality has been carried out. Footfall, building condition and opening hours have been recorded and published within the Main Centres Survey 2018. Having only 2 years' worth of data at present means that it is too early to draw conclusions on trends, but these will be reported as appropriate in the future.

2017 AMR Action Update - the 2017 AMR included an action to include detailed analysis of vacant retail premises, equivalent to the monitoring work undertaken for office, industry and storage uses, if other Committees would find this data useful. Retail vacancies continue to be monitored as part of the Main Centres Survey and data is collected via the Cortex system, however there is no routine analysis of the data at this time. More detailed analysis such as that described could be provided in the future if required.

INDICATOR – Diversity of uses in the Core Retail Area		
Plan Objective		Plan Objective 3: Support a thriving economy. Plan Objective 4: Support a healthy & inclusive society.
Target		>60% ground floor retail use.
Outcome	2018	Town Core Retail Area: 69% of units in active retail use Bridge Core Retail Area: 54% of units in active retail use
	2017	Town Core Retail Area has a total of approximately 68% ground floor retail use, whilst the Bridge has approximately 60%.

Target met?	Target met within the Town CRA. Within the Bridge CRA, the percentage of retail units is 61%, but only 54% of these are currently in active use, the remaining being recorded as vacant.
Comments (including any risks to delivery)	
Action	2017 AMR Action Update – The 2017 AMR Action to monitor additional measures of vitality has been carried out. Footfall, building condition and opening hours have been recorded and published within the Main Centres Survey 2018. Having only 2 years' worth of data at present means that it is too early to draw conclusions on trends, but these will be reported as appropriate in the future.

INDICATOR – Vacancies in the Core Retail Area		
Plan Objective		Plan Objective 3: Support a thriving economy. Plan Objective 4: Support a healthy & inclusive society.
Target		<10% vacancies.
Outcome	2018	9% in Town Core Retail Area, 7% in the Bridge Core Retail Area.
	2017	5% in Town Core Retail Area, 6% in the Bridge Core Retail Area.
Target met?		Yes.
Comments (including any risks to delivery)		An increase in vacancies in the Core Retail Areas compared to 2017 should continue to be monitored. Vacancies in the wider 'town centre areas' appear to have decreased in Town since the 2010 Roger Tym & Partners Retail Study, with a slight increase in the Bridge though the figures relating to the Bridge are less conclusive as the 2010 data may not be directly comparable.
Action		None.

Regeneration Areas

The Regeneration Areas present opportunities for significant new sustainable place making, attracting inward investment and making improvements to, and enhancement of, the public realm and historic environment, all of which will sustain the vitality of the Main Centres and ensure that they remain attractive places in which to live, shop, work and spend leisure time (Policy MC11: Regeneration Areas). In response to consultation for the AMR process the C*f*ED letter recognised the opportunity for Regeneration Areas to add to the consumer experience in Town.

The Regeneration Areas are located at South Esplanade and Mignot Plateau; Lower Pollet; and Le Bordage/Mansell Street in St Peter Port and Leale's Yard at the Bridge in St Sampsons/Vale.

The response to the 2018 AMR from the C*f*ED refers to the draft Retail Sector Policy Statement where it recognises that supporting the Main Centres does not just involve helping shopping outlets, but also encouraging a mix of uses in current retail areas. The C*f*ED response explains that this includes places such as the area around Mill Street and Mansell Street, which could encompass a mixture of land uses such as residential accommodation and hospitality, with some retail units continuing to be retained where the market considers it appropriate to do so. The C*f*ED consider that such an approach has the potential to improve the vibrancy of these areas by enabling more people to live in close proximity, thereby having a positive effect on footfall for the retail sector as well as other service industry outlets.

Relevant policies in the IDP would support such an approach, with the objective of sustaining the vitality of the Main Centres and ensuring that they remain attractive places in which to live, shop, work and spend leisure time.
The response from the C*f*E&I includes details on planned improvements to the public realm, including at North Plantation (partly within the Town Core Retail Area and partly within the Lower Pollet Regeneration Area) which will see vehicular access to the road restricted after 10am until 3am to improve road safety, allow the area to become predominantly pedestrianised and allow for additional al fresco dining. In addition, it is the intention that in the future the C*f*E&I will look at making pedestrian/public realm improvements in the Lower Pollet.

Public realm improvements such as those described above can have a significant impact on vitality and viability and can in themselves act as catalysts for economic improvements to an area, encouraging increased footfall and investment. Another critical factor in terms of perception of an area are vacancy levels. As such, the number of vacant units in each of the Regeneration Areas has been recorded during survey and is presented below in Figure 3.

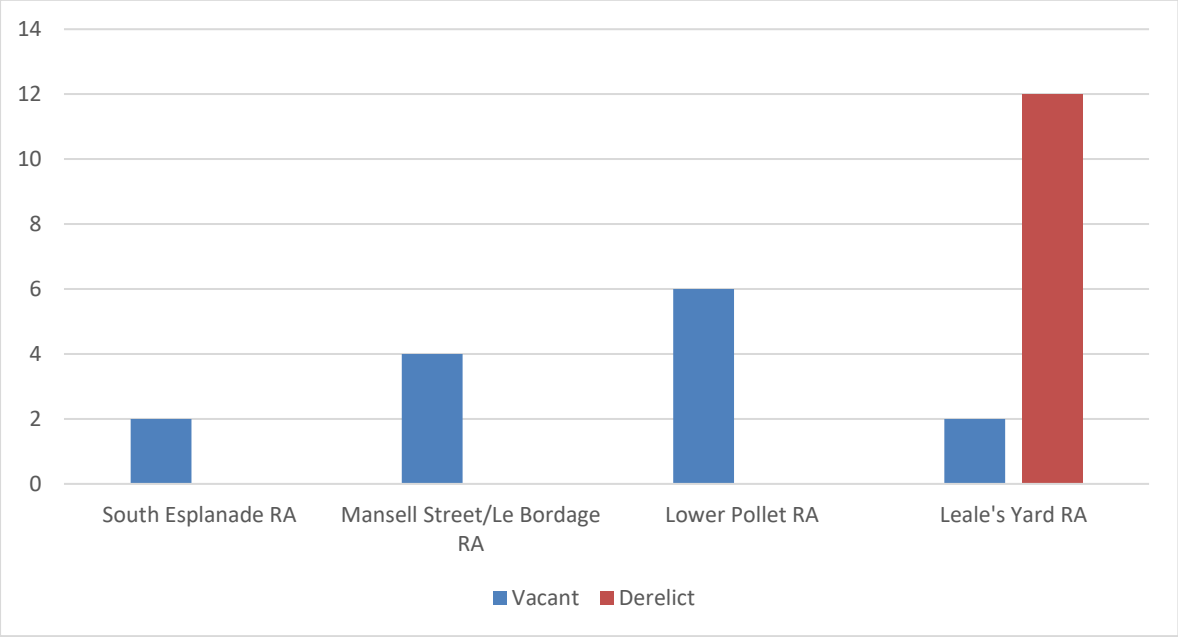


Figure 3: Number of vacant and derelict units in the Regeneration Areas

The number of vacancies in the Lower Pollet Regeneration Area had risen from 2 units in 2017 to 6 units in 2018, and in the South Esplanade Regeneration Area from 1 to 2 units. The number of vacant units in Leale's Yard decreased from 3 units in 2018 to 2 in 2018. The unit recorded as derelict in 2017 in the Mansell Street/Bordage Regeneration Area has now been demolished (formerly part of Ideal Furnishings), and the derelict units in the Leale's Yard Regeneration Area are unchanged, constituting various former warehouses and other structures behind the main frontage of The Bridge. As noted in the 2017 AMR, The Bordage/Mansell Street Regeneration Area designation incorporates only the eastern side of Mill Street/southern side of Mansell Street. This is clarified here as there were several vacant units on the north side of Mansell Street at the time of survey but which are not included as they fall outside of the Regeneration Area. They are noted, however, as part of the Goad categorisation described in the Core Retail Areas section of this report.

As with Core Retail Areas, footfall data, opening hours information and building condition have been recorded as part of the 2018 Main Centres Survey and is reported in full in a separate Main Centres Survey report. With only two surveys complete there is currently insufficient data on which to draw conclusions on trends, but included the following findings:

- Within the Lower Pollet Regeneration Area, approximately 45% of ground floor units where the opening hours are known are open after 5pm, reflecting the high proportion of cafes, bars and restaurants compared to other parts of Town;
- The Mansell Street/Le Bordage Regeneration Area had an increase in the number of units recorded as being in poor condition compared to the 2017 data;
- Footfall counts in the South Esplanade/Mignot Plateau Regeneration Area were highest around lunchtime, consistent with 2017, and the area has a busy, if not vibrant, feel; and,
- Residential use makes up approximately 48% of ground floor units within the Leale's Yard Regeneration Area.

Island Development Plan Policy MC11: Regeneration Areas requires a Development Framework for each Regeneration Area prior to their redevelopment. An update on progress with these Development Frameworks is provided in the Strategic Development and Infrastructure Thematic Report. In the meantime the policy supports proposals where they are of a minor or inconsequential nature.

In 2018 there were 7 planning applications determined within the 4 Regeneration Areas, all of which were for relatively minor works and all of which were approved. These included the installation of signs and retractable awnings, repairs and internal alterations to Protected Buildings, and the installation of solar panels.

The Leale's Yard Regeneration Area provides considerable potential for a range of uses including mixed use, providing for investment opportunities and residential and community development which would support and enhance the sustainability of the St Sampson/Vale Main Centre. There is potential to coordinate development opportunities and secure improvements to road layout and traffic circulation, the pedestrian environment, public realm and climate change mitigation through comprehensive consideration of the Regeneration Area through a Development Framework. The Authority will therefore

prioritise bringing forward a Development Framework for this Regeneration Area in order to facilitate delivery.

2017 AMR Action Update - Monitoring and reporting on additional factors relating to vitality and viability in the Regeneration Areas has taken place and the results published in full in the Main Centres Survey 2018.

INDICATOR – Vacancies in the Regeneration Area		
Plan Objective		Support a thriving economy.
Target		Reduction in vacancies.
Outcome	2018	• Reduction in vacant units in Leale's Yard RA (from 3 to 2 units) • Increase in vacant units in the South Esplanade RA (from 1 to 2 units) • Increase in vacant units in the Lower Pollet RA (from 2 to 6 units) • No change in the number of vacant units in the Bordage/Mansell Street RA
	2017	There were vacancies in each of the Regeneration Areas at the time of survey.
Target met?		No.
Comments (including any risks to delivery)		The annual survey work will continue to record vacancy levels in the Regeneration Areas.
Action		Continued monitoring of factors relating to vitality and viability.

Main Centre (Inner Areas)

The remainder of the Main Centre Inner Areas are again mixed use areas but they do not have the retail focus of the Core Retail Areas, or need a comprehensive approach to development as in the Regeneration Areas. Beyond the Core Retail Areas the IDP policies provide flexibility to change away from retail use where it supports the objective of ensuring the Main Centres remain attractive focal points for economic and social activity including uses such as residential and office. Policies relating to the Main Centre Inner Areas include those relating to Housing, Visitor Accommodation, Offices, Industry and Storage and Distribution, among other topics. These are explored at length in the relevant thematic reports.

The Main Centre Inner Areas were surveyed for their diversity of uses, though additional information on building condition and opening hours was not collected. Beyond the Core Retail and Regeneration Areas the Main Centre Inner Areas are predominantly residential, however there are other important uses which support sustainable communities, such as schools, places of worship, convenience shopping and some industrial, storage and office uses. Policies allow for retail and other uses, supporting the objective of ensuring that the Main Centres remain attractive focal points for economic and social activities.

Survey data was gathered in order to identify different uses within the Main Centre Inner Areas and provide an indication of the balance of uses. The data is published in full in the

2018 Main Centre Survey, however, within the Bridge Main Centre Inner Area the non-residential uses were found to be focused around the Core Retail Area, particularly Northside and Southside, as well as the Lowlands Road Industrial Estate. There was a notable absence of office uses in contrast to Town, and more industrial, storage and distribution uses around the central part of the Bridge Inner Area than found in Town, where offices tend to be more dominant. Visitor accommodation is focused in and around the Main Centre Inner Area of Town. Office uses line the main routes in Town towards the Core Retail Area.

There do not appear to have been any significant changes to the spatial distribution of non-residential development within the Main Centre Inner Areas between 2017 and 2018.

In terms of planning applications within the St Peter Port Main Centre Inner Area, excluding those applications relating to the HAA which are covered elsewhere in this report, there were 119 decisions in 2018. The majority of these were for minor works (including to Protected Buildings) or householder applications. Of the remaining 36 applications determined, 34 were approved and 2 were refused. These primarily fall into the following broad categories:

- Applications for a Change of Use;
- Applications related to the public realm, including the installation of interpretation and exhibition boards; and,
- Applications relating to the restoration of Hauteville House (Victor Hugo's House).

No particular trends have been observed from the applications, although several change of use applications related to a change from office to residential use on the ground and upper floors (7 units created), plus a convenience retail unit was granted approval to change to café and additional office floorspace was created (approximately 217m^2 in total new office floorspace). In total, 473.8m^2 of office floorspace changed to other uses, 96m^2 of which is a temporary change for 5 years. The approvals relating to the restoration of Hauteville House are noted here because of the significance of the building itself, both to Guernsey and internationally. The restoration project was supported by policies in the IDP, in particular GP4: Conservation Areas, GP5: Protected Buildings and GP8: Design.

The 2 refusals noted above both relate to the same property and were for the change of use from office to residential use (two flats) within the historic core of St Peter Port. The applications were both refused as the proposals resulted in an unacceptably poor quality of residential environment, contrary to policy GP8 and MC2.

Within the Bridge Main Centre Inner Area there were 24 planning applications determined in 2018, 3 of which were within the HAA and are discussed elsewhere in this report. Of the remaining 21 applications, the majority were for minor works or householder applications. There were just 2 more significant decisions which were as follows:

- Change of use from general retail to a mixed general retail and design office studio (Southside House); and,
- Installation of an interpretation board (relevant to the public realm).

The change of use application was supported by policies MC4(A): Office Development in Main Centres and MC6: Retail in Main Centres. There was no loss of retail and the combined use contributes to the vitality of the area. The installation of an interpretation board (tourist information and map) was supported by policies MC4: Conservation Areas and GP8: Design.

As shown, there were a variety of approvals for different types of development which reflects the intention of the policies in the IDP to support the Main Centre Inner Areas as mixed use locations where development is focused. Figures 5 and 6 at the end of this report show the location of the approvals in St Sampson/Vale and St Peter Port.

In summary, the policies appear to be working as intended, supporting a variety of uses in the Main Centre Inner Areas and providing the flexibility to change between uses in appropriate circumstances, where this supports the vitality and viability of the Main Centres.

2017 AMR Action Update – the 2017 AMR included an action to liaise at officer level with the Committee *for* Economic Development and stakeholders, as well as reviewing other evidence, to identify the required stock of smaller office units. Work on the Employment Land Study Update 2018 has included liaison at officer level with the Committee *for* Economic Development and stakeholders to begin to identify required stock of smaller office units.

2017 AMR Action Update – There has been continued monitoring to ensure the Main Centre Inner Areas retain an appropriate mix of uses and this action is carried forward.

INDICATOR – Diversity of uses in the Main Centre Inner Area		
Plan Objective		Plan Objective 3: Support a thriving economy.
Target		None.
Outcome	2018	Mix of uses in the Main Centre Inner Areas differ between Town and the Bridge – Offices line the main routes into Town whereas the Bridge has a greater number of industrial and storage premises close to the Core Retail Area. Visitor accommodation is focused in and around the Main Centre Inner Area of Town. 7 residential units were created at upper floor level. 473.8m^2 of office floorspace changed to other uses (4 applications, 96m^2 temporary change), and 217m^2 office floorspace was created (net loss of 256m^2 in the Main Centre Inner Areas).
	2017	Raw data collected and baseline being established. Policies appear to be enabling appropriate mix and range of uses of an appropriate scale. The change of use of small premises (under 250m^2) in and out of office use will be included in the monitoring. During 2017, there was an overall gain of 286m^2 office floorspace through such applications, though within the Main Centres there was a loss of 176m^2.
Target met?		n/a

Comments (including any risks to delivery)	No current trends identified.
Action	Continued monitoring to ensure the Main Centre Inner Areas retain an appropriate mix of uses. Continue to liaise at officer level with the Committee *for* Economic Development and stakeholders, as well as reviewing other evidence, to identify required stock of smaller office units.

Main Centre Outer Areas

In the Main Centre Outer Area policies allow for new convenience retail (and limited works to existing comparison retail outlets) to ensure that the Main Centre Inner Areas remain the core focus for economic and social growth as directed by the SLUP. As such the Main Centre Outer Areas are again predominantly residential, with some social and community facilities and convenience retail, amongst other uses, although the Main Centre Outer Area of St Peter Port also incorporates Admiral Park.

As with the Main Centre Inner Areas, survey data was gathered in order to identify different uses within the Main Centre Outer Areas and provide an indication of the balance of uses. In the Town Main Centre Outer Area there are clusters of non-residential uses such as industrial uses south of La Vrangue and office uses at Admiral Park, as well as the Pitronnerie Road Key Industrial Area. There are a variety of uses along the inter-harbour route, including industrial, storage & distribution, office, retail, restaurants, cafes and pubs. Public amenity uses such as schools, doctors, churches and leisure facilities are scattered throughout.

Within the Bridge Main Centre Outer Area there are several public amenity uses such as schools, plus a few non-residential units along Traffic Priority Routes of Vale Road/Route Militaire and La Route du Braye. Overall, however, industrial, storage and distribution uses form the majority of the non-residential uses in the Main Centre Outer Area due to the presence of the Key Industrial Areas.

In terms of planning application data in the Main Centre Outer Areas, there was a total of 181 planning applications determined in the St Peter Port Main Centre Outer Area in 2018. The majority of the applications were householder applications, those relating to works to Protected Buildings and other minor works, such as electrical installations. Several applications also fell within the HAA, relating to La Vallette area and bathing pools (e.g. signs, public bench, lifebuoy and interpretation board). 12 applications within the MCOA related to new residential development (including 1 application to vary previously approved plans).

10 applications were for change of use within the St Peter Port Main Centre Outer Area, all of which were approved, as follows (only the main relevant IDP policies are listed in each case):

- 2 approvals for change of use of residential to home working involving a small outbuilding and one room of a house (consistent with Policy GP14: Home Based Employment);
- 1 approval for change of use from general industrial to general storage and industrial within a Key Industrial Area consistent with Policy MC5(A): Industry, Storage and Distribution Uses in Main Centres and Main Centre Outer Areas – within Key Industrial Areas and Key Industrial Expansion Areas (see also Offices, Industry and Storage & Distribution AMR report);
- 3 approvals for the change of use of agricultural land to domestic garden (totalling circa 8000m^2) consistent with policies GP15: Creation and Extension of Curtilage, GP1: Landscape Character and Open Land, and MC1: Important Open Land (where relevant);
- 1 approval for the change of use from ancillary storage associated with a café, to an independent storage unit (Use Class 22) consistent with policies MC7: Retail in Main Centre Outer Areas, and MC5(B): Industry, Storage and Distribution Uses in Main Centres and Main Centre Outer Areas – outside of the Key Industrial Areas and Key Industrial Expansion Areas;
- 1 approval for the change of use of a restaurant to residential, consistent with policies MC2: Housing in Main Centres and Main Centre Outer Areas and MC7: Retail in Main Centre Outer Areas;
- 1 approval to change use from retail to health suite consistent with policies MC7: Retail in Main Centre Outer Areas and MC9(A): Leisure and Recreation in Main Centres and Main Centre Outer Areas – New, Extension, Alteration or Redevelopment of Existing Uses; and,
- 1 approval to change use from light industrial to public amenity/office use consistent with policy MC5(C): Industry, Storage and Distribution Uses in Main Centres and Main Centre Outer Areas – Change of Use.

The number and variety of applications and approvals reflects the range and scale of activities which take place within the Main Centre Outer Area. Policies allow some degree of flexibility whilst ensuring that the Main Centre Inner Area remains the focus for economic and social growth.

Within the St Sampson/Vale Main Centre Outer Area there were 85 planning applications determined in 2018. Approximately 60 of these were either householder applications, those relating to works to Protected Buildings and other minor works, such as electrical installations. Several applications fell within the St Sampson/Vale HAA, and these are noted in the HAA section of this report. 9 applications related to new residential development (or revisions/variations to previous applications for new residential development), which are covered in more detail in the Housing thematic report.

3 applications within Housing Allocation sites were given temporary planning approval. These were for:

- The retention of temporary hard surfacing associated with an event hire business;
- The extension of the duration of temporary permission of 3 storage compounds; and,
- The temporary change of use of part of vinery site to create parking for 2 vehicles.

An additional temporary permission was granted for the change of use of land as a site compound.

There were also 4 approvals for change of use within the St Sampson/Vale Main Centre Outer Area as follows (only the main relevant IDP policies are listed in each case):

- 1 approval for the change of use from residential to home working, consistent with Policy GP14: Home Based Employment;
- 1 approval for the change of use of agricultural land to domestic garden, consistent with Policies GP1: Landscape Character and Open Land, and GP15: Creation and Extension of Curtilage (relating to approximately 350m^2); and,
- 2 applications for the change of use from industrial to industrial relating to the processing of waste (Use Class 27), consistent with Policy MC5(A): Industry, Storage and Distribution Uses in Main Centres and Main Centre Outer Areas – within Key Industrial Areas and Key Industrial Expansion Areas (see also Offices, Industry and Storage & Distribution thematic report).

Additionally, there was an approval to install a new pedestrian and cycle crossing at the junction of Grandes Maison Road and Bulwer Avenue, which became fully operational in early 2019.

As in St Peter Port Main Centre Outer Area, these approvals show a variety of uses of a scale that is acceptable in the Main Centre Outer Areas and does not detract from the vitality of the Main Centre Inner Area.

Figures 5 and 6 at the end of this report show the location of all the relevant planning approvals in the Main Centres during 2018, indicating a scattered distribution of approval throughout the Main Centre Outer Areas.

In summary, the Main Centre policies appear to be delivering the spatial objective of ensuring that development is focused in the Main Centre Inner Areas, with the planning approvals for the Main Centre Outer Areas quite distinct and reflective of the role of that policy designation.

2017 AMR Action Update - Monitoring has continued to ensure the Main Centre Outer Areas retain an appropriate mix of uses with trends and findings reported in future AMRs. This action is carried forward.

INDICATOR – Diversity of uses in the Main Centre Outer Area		
Plan Objective		Support a thriving economy.
Target		None.
Outcome	2018	Spatial distribution of non-residential uses plotted – no significant negative indications. Differences between the two Main Centres noted.
	2017	Raw data gathered. Planning approvals indicate development of a type and scale appropriate to the Main Centre Outer Areas as intended by policies.

Target met?	n/a
Comments (including any risks to delivery)	Policies appear to be delivering the spatial objectives.
Action	None.

Harbour Action Areas

Harbour Action Areas have been identified in both St Peter Port and St Sampson/Vale, where a co-ordinated approach to mixed use development is supported, recognising the potential opportunities for development and securing significant inward investment, as well as improvement of the appearance and accessibility of public places. With this policy basis and to progress the States priority for Seafront Enhancement, the Seafront Enhancement Area (SEA) programme has been established to explore opportunities and coordinate development of the eastern seaboard, taking into account economic, environmental and social objectives. The C*f*ED notes the potential of the SEA in relation to the preparation of a draft Retail Sector Policy Statement, and in its feedback for the AMR, the potential to create new retail outlets/facilities and to improve access to retail areas, particularly in the Main Centres.

Island Development Plan Policy MC10: Harbour Action Areas notes that detailed strategies for the development of the St Peter Port Harbour Action Area and the St Sampson's Harbour Action Area will be provided in a Local Planning Brief for each area when approved by the States of Guernsey. In the meantime the policy supports proposals where they are of a minor or inconsequential nature or do not prejudice the outcomes of the Local Planning Brief process.

Policy IP3: Main Centre Port Development supports development that is essential to the effective, efficient and safe operation of the ports, providing that the development would not prejudice the outcomes of the Local Planning Brief process and would not inhibit the implementation of an approved Local Planning Brief.

In 2018, 51 planning applications within the HAA were determined – 31 of these were within the St Peter Port HAA, and 20 were within the St Sampson/Vale HAA. This is broadly similar to the number of applications determined in 2017, with 39 in St Peter Port HAA and 21 in the St Sampson/Vale HAA.

Policies MC10 and IP3 are providing the flexibility to approve developments in the Harbour Action Areas that would not prejudice the outcomes of the Local Planning Briefs. Whilst the approvals all related to relatively minor development, the types of applications are varied, including those relating to retail (such as new signs, awnings, and works to historic buildings), public amenity related (for example information boards, public benches), and those related to storage or industrial uses (primarily within the Key Industrial Areas of St Sampson/Vale). Of more significance, but still considered to be without prejudice to the HAA, was an approval at Griffiths Yard, North Side/Castle Road, for 11 storage compounds and associated development. The storage compounds were approved on States of Guernsey owned land and are expected to be occupied, at least in part, by tenants of the former Fontaine Vinery site.

The variety of approvals, and the lack of refusals, suggests that there is sufficient flexibility in the IDP policies to enable development of an appropriate scale to continue to come forward in the transitional period prior to the adoption of a Local Planning Brief for the Harbour Action Areas. This flexibility is of high importance when considering that the HAAs also include parts of the Main Centres designated as Core Retail Areas and, in the case of St Sampson/Vale, Leale's Yard Regeneration area.

In addition, and with close relevance to the HAAs, significant progress has been made in relation to the SEA programme in 2018, with a political Steering Group co-ordinating the programme. The Steering Group has decided to split the overall SEA programme into two work streams:

1. The development of a long-term plan for the east coast; and,
2. The identification of shorter-term initial enhancement projects.

Further information is set out in the update from the Policy & Resources Committee (P&R) which is included in the Appendix to the AMR and the Strategic Development and Infrastructure Thematic Report.

In summary, current IDP policies which allow the principle of development that will not prejudice the HAAs appear to be providing the correct balance, allowing appropriate development to take place. The HAAs are of high importance and have Island-wide implications. A sound evidence base will be critical in informing decisions within the HAAs to ensure that the interaction and interplay of the harbours and Regeneration Areas and wider Main Centres are adequately considered.

2017 AMR Action Update - the 2017 AMR included an action for the Authority to have close involvement with the development of proposals for the St Peter Port Harbour Action Area through representation on the Seafront Enhancement Area Steering Group and the officer level working group. This involvement is ongoing and the action is carried forward.

Action - Monitoring of approvals within the Harbour Action Areas.

Accessibility

Accessibility of the Main Centres is an important issue and likely to be a key theme for the HAA, with a particular focus on the links between the two Main Centres. It is also important that transport links don't only begin and end at the Main Centres, but provide linkages into the wider Island to ensure accessibility to the remote parts of the Island, providing transport choices wherever possible and practical. Accessibility is, of course, essential to vitality and viability of the Main Centres.

Baseline data is being collected to consider accessibility within the Main Centres, and also to other parts of the Island. This data is reported in full in the Main Centre Survey 2018 and is important as it reflects the intention of the IDP to deliver the spatial elements of the Integrated Transport Strategy and policies relating to transport infrastructure and highway safety.

The response to feedback for the 2018 AMR from the C*f*E&I included an update on projects relating to the implementation of the Integrated Transport Strategy. These include both planned and implemented projects, including new footways, cycle shelters, enhancement of crossing facilities, accessible parking spaces and pedestrianisation projects. More information is also included in the Main Centres 2018 Survey report. Some of these projects need planning permission and IDP policies generally support the principle of such development. The 2 relevant applications determined in 2018 are listed below.

The Disability & Inclusion Strategy is also relevant to the physical accessibility of the Main Centres, and is another Future Guernsey Plan priority. IDP Objective 4, Support a healthy and inclusive society, is relevant to this and seeks to enable a balance to be achieved between conservation and meeting the access needs of all people. This presents particular challenges, especially in St Peter Port, due to the nature of the historic environment. Once enacted, any future implications of the Disability Discrimination legislation will need to be considered in relation to the physical environment, for example to the accessibility of shops and services within the Main Centres and physical adaptations that may be required of them.

Specific planning approvals relevant to accessibility of the Main Centres were as follows and indicate that policies facilitate small scale transport infrastructure in the Main Centres:

- Upgrade existing crossing and install new street lamps at Fountain Street (Town Main Centre Inner Area); and,
- Bush hammer existing step surface to provide slip resistance for pedestrians (Pier Steps, Town Core Retail Area);

Related to accessibility is the population of the Main Centres, in that proximity to the facilities and services of the Main Centre in itself can facilitate accessibility.

Population statistics from June 2017 and 2018 are presented in Figure 4.

Main Centre	Population		Percentage of total population	
	June 2017	June 2018	June 2017	June 2018
St Sampson/Vale Main Centre Outer Area	3,490	3,495	5.58	5.57
St Sampson/Vale Main Centre Inner Area	1,980	2,006	3.17	3.20
St Peter Port Main Centre Outer Area	11,262	11,248	18.02	17.93
St Peter Port Main Centre Inner Area	5,980	6,048	9.57	9.64

Figure 4: Main Centre Population at Q2 June 2018

There have been no significant changes in population since 2017.

Accessibility is also a very relevant factor for Active Travel under the Health and Wellbeing priority for the States of Guernsey in the Future Guernsey Plan, and the important balance between parking and active travel will, as noted previously, need to be addressed within the HAAs.

Overall, accessibility is an important factor in vitality and viability for the Main Centres also relating to the priority of Active Travel. Monitoring and reporting of relevant data in connection with accessibility will enable trends to be identified to ensure that the policy framework is delivering the spatial aspects of the Integrated Transport Strategy.

2017 AMR Action Update – the monitoring and reporting of relevant data relating to accessibility has been undertaken as part of the Main Centres Survey work. Indicators relating to spatial themes of accessibility have yet to be devised.

Summary

In terms of delivering the requirements of the SLUP in relation to the Main Centres, the AMR findings demonstrate the following:

- The policies remain relevant and effective in supporting appropriate levels of retail development in the Core Retail Areas. The redefining of the retail cores of Town and the Bridge as part of the IDP process, as required by the SLUP, to concentrate their effectiveness has resulted in maintenance of core retail function in Main Centres, and primarily in St Peter Port as required by the SLUP;
- The distribution of development and uses, focused on the Main Centre Inner Areas (including the Core Retail Areas), demonstrates continued support for the spatial strategy of the SLUP;
- The IDP policies relating to the HAAs (MC10) and Regeneration Areas (MC11) are performing as intended, allowing minor development to come forward without undermining the comprehensive approach to development that will come through the IDP mechanisms of Local Planning Briefs (for the HAAs) and Development Frameworks (for the Regeneration Areas). These mechanisms, put in place in the IDP, will be central to allowing the development of these areas and could be the catalyst to delivering significant social, economic and environmental development and enhancement. This will be tested as the process moves forward and will be reported on in future AMRs;
- A significant challenge for the IDP is to provide the balance between protecting the built environment and the historic identity of the Main Centres, whilst meeting the economic, environmental and social development needs as may be required by businesses and the community. There is no evidence to suggest that the policies are not functioning as intended or that this balance is not being achieved; and,
- Overall, the policies in the IDP which have been tested appear to be delivering SLUP and States' objectives (as set out in the Future Guernsey Plan), and as such no changes are needed to policies. Additionally, no blockages to delivery have been identified.

Summary of monitoring requirements

- Continued monitoring of factors relating to vitality and viability;
- Continued monitoring to ensure the Main Centre Inner Areas retain an appropriate mix of uses;
- Continued monitoring to ensure the Main Centre Outer Areas retain an appropriate mix of uses; and,
- Continued monitoring of planning approvals within the Harbour Action Areas.

Summary of action required

- The Development & Planning Authority to continue to liaise with the Committee *for* Economic Development at officer level in connection with updating the Retail Study and with regard to the emerging Retail Sector Policy Statement;
- Continue to liaise at officer level with the Committee *for* Economic Development and stakeholders, as well as reviewing other evidence, to identify required stock of smaller office units; and,
- Continued close involvement with the development of proposals for the Seafront Enhancement Area programme.

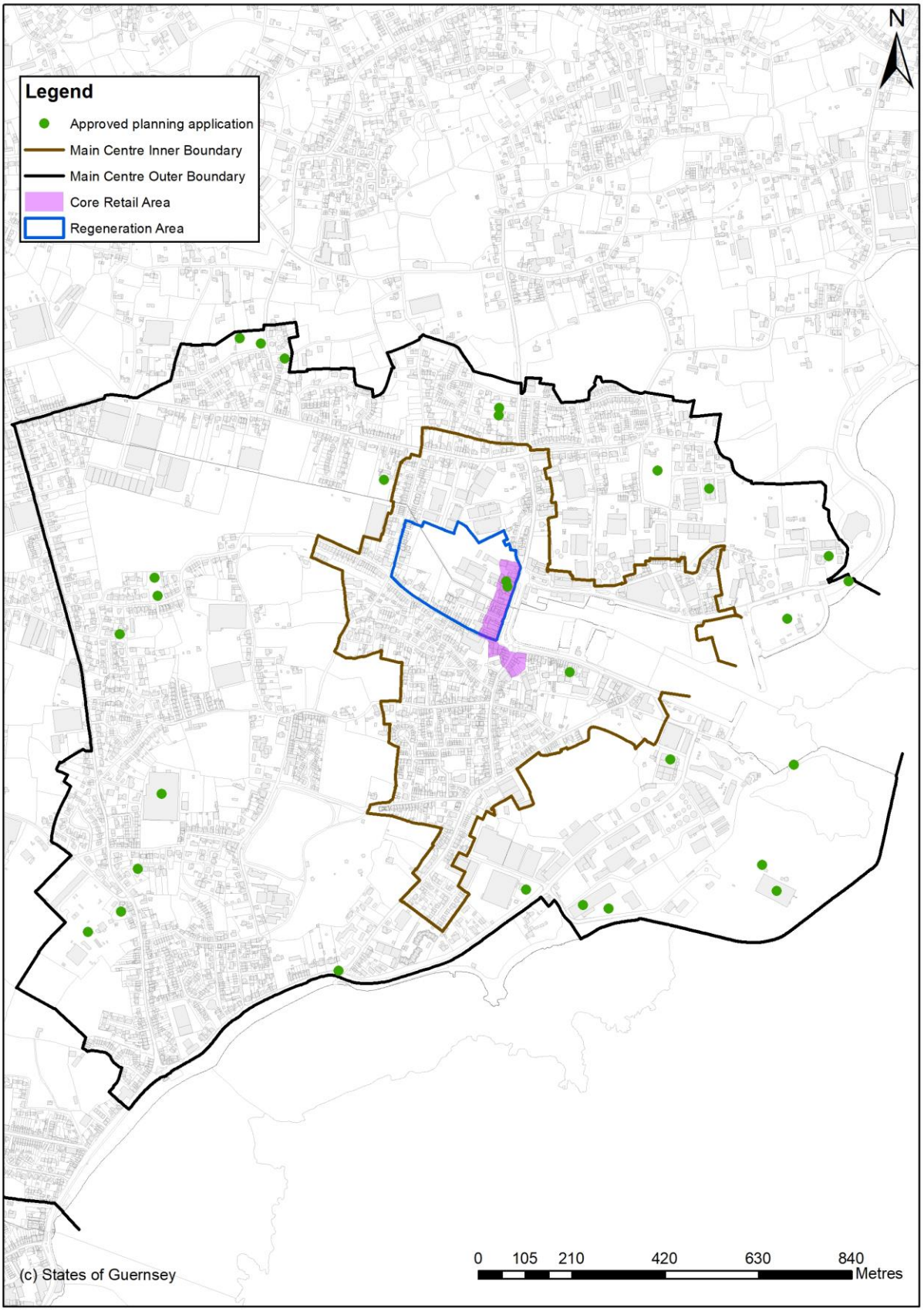


Figure 5: Location of relevant approvals in the St Sampson/Vale Core Retail Area, Regeneration Area, Main Centre Inner and Main Centre Outer Area, 2018

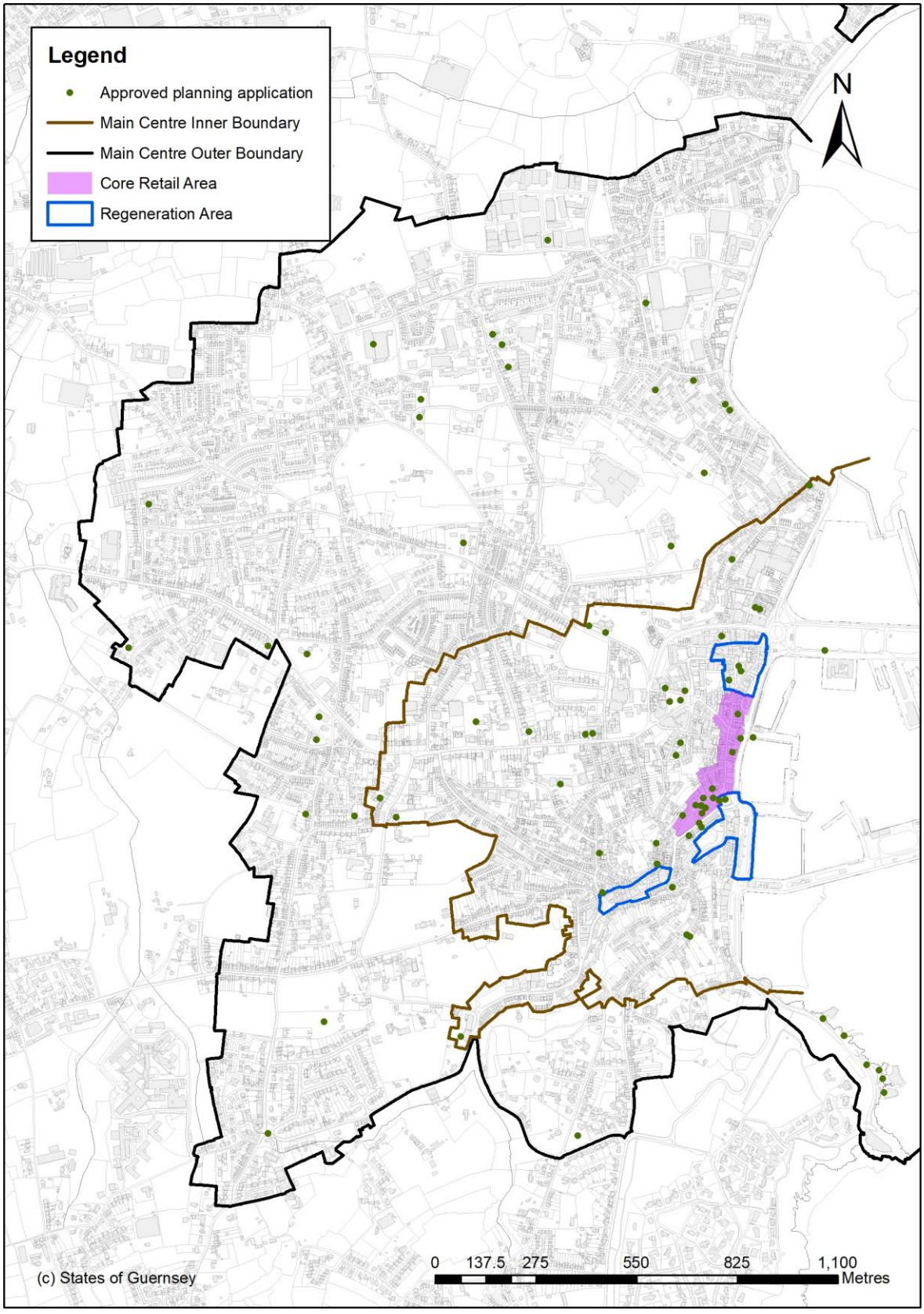


Figure 6: Location of relevant approvals in the St Peter Port Core Retail Area, Regeneration Areas, Main Centre Inner and Main Centre Outer Area, 2018

Local Centres

Introduction

The concept of Local Centres is set out in the Strategic Land Use Plan (SLUP) and relates to the overall spatial strategy of concentrating development within and around the Main Centres of St Peter Port and St Sampson/Vale with some limited development around the main parish or local centres to enable community growth and the reinforcement of sustainable centres. The main SLUP policy that relates to this intention is Policy LP10: Local Centres which sets out that the identification of local centres will be based on the assessment of services and facilities (sustainability indicators) within the locality and enable limited development of a scale appropriate to the specific location. Policy SLP16 relating to housing provision requires the Island Development Plan (IDP) to make provision for limited opportunities for housing development to reinforce the local centres as sustainable centres.

Through the IDP preparation and inquiry process, 7 Local Centres were defined in the IDP:

- Cobo;
- Forest;
- Forest West;
- L'Aumone;
- L'Islet;
- St Martin; and,
- St Pierre du Bois.

Local Centres are not intended to be growth points and the primary purpose of allowing development in Local Centres is to support community growth and to reinforce them as sustainable centres as required by the SLUP. The intention is that development in and around Local Centres will account for only a small percentage of the Island's growth, and this applies to the facilities, shops and services within Local Centres as it does to housing and employment. As such, Local Centre policies allow for limited development of a scale appropriate to that specific Local Centre and which would not undermine the vitality of the Main Centres and meets the everyday needs of local residents. Furthermore, as stated in paragraph 10.1.6 of the IDP, development proposals will be subject to control over the scale of the resultant development.

2017 AMR Action Update – the 2017 AMR included an action to continue to undertake Local Centres surveys and publish the data annually. An annual survey of the Local Centres is carried out to record changes in the provision of facilities, services and shops, as well as recording changes to infrastructure (such as pedestrian crossing points). The data is published in full in a separate Local Centres' Survey 2018 report[1] and is used to inform this AMR report where relevant.

The IDP sets out a number of 'sustainability indicators' which were used to inform the identification of the Local Centres. These are as follows:

- A general convenience store selling fresh produce;

[1] Local Centres Survey 2018 can be viewed in full here: Local Centres Survey 2018

- A doctor's surgery;
- A primary school/pre-school;
- A bank or cash point;
- An amenity area;
- Community facilities;
- Leisure and recreation facilities;
- A post office;
- A bus service; and,
- Employment.

These elements are discussed below, though the emphasis is now not on identification of Local Centres, but on monitoring, ensuring that policies are used to maintain the appropriate level, range and balance of uses. Section 21 of the IDP requires that monitoring includes a commentary for the Local Centres for each of the themes of living, working and spending leisure time. As such, these themes are embedded in the following report by noting changes such as to population and housing numbers and recorded through the annual survey, planning approvals and other relevant information sources.

The Committee *for* Health & Social Care (C*f*H&SC), in its feedback for the 2018 AMR, reiterated the importance of the relationship between the physical environment and health, noting that poor housing, deprived neighbourhoods and a lack of green space can impact negatively on both physical and mental health. Furthermore, the C*f*H&SC notes that the creation of physical environments where people can live healthier lives with a greater sense of wellbeing greatly reduces health inequalities. This principle is reflected in the IDP objectives (Plan Objective 4), and specifically within the Local Centre policies, for example through the designation of Important Open Land to protect and enhance the openness, landscape character and visual quality of these areas, and through the spatial strategy of supporting Local Centres as socially inclusive, healthy and sustainable communities.

Related to Local Centres (though not exclusively bound to them) is Policy GP19 of the IDP, which relates to Community Plans. Further guidance is also set out in Community Plans Supplementary Planning Guidance 2016[2]. Community Plans provide an opportunity for members of the public to set out a vision for improvements and change to a particular locality, whether this covers a small collection of homes or a wider settlement area. It is envisaged that Community Plans will generally be produced by the community for areas within the identified Local Centres, though equally they may be produced for other areas of the Island. Community Plans provide an opportunity for members of the community to produce a vision for improvements to their local area, for example, that could bring about enhancements to the environment or other changes such as improvements to the public realm or traffic calming measures in a co-ordinated way. In feedback for the AMR, support was expressed for Community Plans by the Constables of St Pierre Du Bois. No Community Plans were submitted in 2018.

[2] The full Supplementary Planning Guidance document can be viewed here: Community Plans SPG 2016

General Convenience Retail in Local Centres

Of critical importance to Local Centre designation was the presence of a general convenience store. Convenience retail is the selling of, often essential, daily items such as fresh produce and food and drink and includes stores such as provided at petrol stations (e.g. Co-Op En Route*).*

In accordance with IDP policy, new convenience retail of a scale appropriate to the particular Local Centre is supported where it would not undermine the vitality of (or compete with) the Main Centres. Appropriate scale in this context also includes cumulative scale.

There remains at least 1 general convenience store in each of the Local Centres with no increase or decrease since the Local Centres were identified.

In terms of planning applications relating to convenience retail within the Local Centres in 2018, an application in L'Islet, which included a retail unit on the ground floor with a residential unit above, was refused. There was no policy objection in principle to the development as both uses were of a scale and type compatible with the spatial strategy. However the design was considered to provide poor standards of accommodation and the provision of a retail unit at ground floor and a residential unit at first floor amounted to the overdevelopment of a limited site. The proposal was therefore found to be contrary to policies GP8: Design, GP9: Sustainable Development, LC2: Housing in Local Centres as well as IP7: Private and Communal Car Parking.

In St Martin's Local Centre there was an application to install an ATM machine and a trolley shelter at the Co-Op Grand Marche. This application was approved, supported principally by Policy LC5: Retail in Local Centres. The works were considered minor works associated with the existing retail use which would not undermine provision in the Main Centres.

A further minor application was approved in St Peter's Local Centre for signage at the Food Hall related to the Morrison's branding. Again, this was approved in accordance with policies LC5: Retail in Local Centres and GP8: Design.

In Cobo, an application for the demolition of existing buildings and replacement with an extension to provide retail at ground floor and residential at first floor (Maison De Carteret, Route Des Carteret) was approved with a condition limiting the retail use to convenience retail only to comply with Policy LC5. The retail floorspace is approximately 53m^2. The scale proposed was not considered to undermine the vitality of the Main Centres.

As reported in the 2017 AMR, during the public inquiry into the IDP, the Inspectors considered the possibility of including Les Capelles as a Local Centre. However the only convenience store, at the time of inquiry, had planning permission for conversion into 2 residential units. Given the uncertainty of the future of the convenience store and that the presence of a convenience retail store was considered critical to the designation as a Local Centre, it was concluded that the designation of Les Capelles as a Local Centre did not meet the essential criteria for designation. However, the Inspector's noted: "In the event of the existing store being retained and refurbished, or if a new convenience store were to open in

the area, it would be appropriate for consideration to be given to reviewing the IDP and designating Les Capelles as a Local Centre".

The permission for change of use of the convenience store at Capelles was not implemented and has now expired, so the consideration of Capelles as a Local Centre may be appropriate at the time when the IDP is reviewed.

- **2017 AMR Action Update -** Monitoring of the provision of general convenience stores within the Local Centres – this has continued and is reported in full as part of the 2018 Local Centres Survey report; and,
- At the point of review of the IDP, consideration will be given to reviewing Les Capelles as a Local Centre - as yet that situation has not arisen.

INDICATOR – Number of general convenience stores selling fresh produce within the Local Centre		
Plan Objective		Plan Objective 4: Support a healthy and inclusive society.
Target		Minimum 1 per Local Centre.
Outcome	2018	There remains at least 1 general convenience store in each of the 7 Local Centres.
	2017	There is at least 1 general convenience store in each of the 7 Local Centres, with no increase or decrease since the Centres were identified.
Target met?		Yes.
Comments (including any risks to delivery)		Policy LC5: Retail in Local Centres does not support change of use away from convenience retail where it would result in the loss of essential facilities which would have a negative effect on the sustainability and vitality of the Local Centre, and this part of the policy has yet to be tested.
Action		Continued monitoring of general convenience store provision in Local Centres. Consideration of reviewing Les Capelles as a Local Centre at the time the IDP is reviewed.

Other sustainability indicators within Local Centres

As noted above, the Local Centres were identified using sustainability indicators, the most critical of which was the general convenience store. However this was not the only indicator used and it is considered that a Local Centre must have a clear and identifiable mix of uses in order to be sustainable and serve the local community. Using the list of 10 indicators in the IDP (paragraph 10.1.3 and as set out above in the introduction to this report), information about the Local Centres has been gathered.

The IDP very much focuses on the individual nature of each Local Centre, requiring that development is appropriate and complementary to the scale and role of the particular Local Centre concerned. This section therefore aims to give a brief summary of the mix of uses in each Local Centre based on the indicators set out in the IDP and information gathered

during survey. A review of relevant non-householder planning applications determined in 2018 is also provided.

For additional context, basic statistics for each of the Local Centres are presented below in Figure 1, including the number of indicators, out of the 10 specified in the IDP, present in each of the Local Centres. An approximate residential density is given, based on a simple calculation of the number of dwellings per hectare (number of dwellings divided by the land area). The Local Centres are listed in order of size of Local Centre (largest first by land area).

Local Centre	Number of indicators present	Size of Centre	Population at March 2018	Number of dwellings			Approximate residential density (dwellings per hectare)
				Dec 2016	Dec 2017	Dec 2018	
St Martin	10	33.3ha (203v)	803	422	423	424	12.7
Cobo	8	18 Ha (110v)	640	295	295	294	16.3
L'Islet	7	16.5ha (101v)	719	316	316	321	19.4
Forest West	7	12.1ha (74v)	315	146	146	146	12.1
St Pierre du Bois	8	10.7 ha (65v)	145	71	71	71	6.6
L'Aumone	5	7.9ha (48v)	367	114	114	114	14.4
Forest	5	5.9ha (36v)	115	34	34	34	5.8

Figure 1: Basic statistics relevant to the Local Centres

As indicated, St Martin's Local Centre is the largest both in terms of area and population, and has all ten indicators present in the Local Centre. In terms of land area and population, Forest is the smallest Local Centre with 5 indicators present, although L'Aumone, which is second smallest in land area, also has 5 indicators.

The number of dwellings per centre differs to the numbers presented in the 2017 report primarily due to differences in the way the data was collated. As such, the table above includes the number of dwellings for the last three years based on a consistent methodology to allow for comparison. As shown in Figure 1, the numbers of dwellings in the Local Centres have remained stable, with only L'Islet having an increase of approximately 1.5% and St Martin with an increase of approximately 0.4% since December 2016. It is important to note that Figure 1 gives details of actual dwelling numbers in each of the Local Centres and not planning permissions, some of which may, or may not, be implemented in the future. Planning permissions are generally accompanied by a condition which requires the development to be implemented within 3 years (in exceptional circumstances this time period may be varied) and as such there may be various unimplemented permissions which apply to the Local Centres. More information about supply of housing is reported in the Housing thematic report.

The remainder of the section is organised by Local Centre for ease of reference and gives a brief overview of the findings of the survey and planning application data from 2018.

St Martin Local Centre

As noted above, St Martin's Local Centre is the largest in terms of land area, population and the number of dwellings. All 10 indicators are present in St Martin's Local Centre. Overall, the Local Centre retains a broad range of uses though is lacking in amenity space. Measures to tackle the dominance of traffic could improve the public realm of the Local Centre, and additional cycle stands and pedestrian infrastructure relating to the retail and community uses could aid accessibility of the Centre.

As noted in the section on General Convenience Retail above, there was 1 approval for minor works to the Grand Marche store for an ATM machine and trolley shelter, supported by Policy LC5.

Other relevant applications in St Martin's Local Centre included the following non-residential approvals (only the main relevant IDP policies are listed):

- Installation of a public access defibrillator at Chertsey House, La Route Des Cornus (supported by Policy IP11: Small-Scale Infrastructure Provision);
- Flagpole at the Professor Shaw Community Centres (consistent with Policy LC3(A): Social & Community Facilities in Local Centres – New, Extension, Alteration or Redevelopment of Existing Uses which states that proposals for alterations to existing social and community facilities will generally be supported where the proposal is of a scale that is appropriate to the Local Centre); and,
- Demolition of outbuildings and erect two semi-detached dwellings at the former Rabey's Yard, Rue Maze (supported by policies LC2: Housing in Local Centres and LC4(B): Offices, Industry and Storage and Distribution in Local Centres – Change of Use).

Additionally, an appeal was submitted against the refusal of planning permission for new comparison/convenience retail in St Martin's. This appeal was, however, subsequently withdrawn.

Also in St Martin's Local Centre, a Development Framework was approved in 2018 for Briarwood, La Grande Rue, St Martin. The Development Framework relates to residential development of the site with potential for between approximately 15-22 dwellings. The Development Framework places emphasis on improving pedestrian and cycle access in St Martin's, including to St Martin's Primary School.

Cobo Local Centre

Cobo Local Centre, at the time of survey, had 8 of the 10 indicators present. The Local Centre appears well served for its role of meeting the needs of visitors and locals, providing convenience retail, places to eat and a bank and employment opportunities. However, given the size of the Local Centre and the number of non-residential units available, even small changes to provision could have the potential to have significant effects on the mix of uses. There is no amenity area within the Local Centre, however there is direct access to the beach although this is separated from the Local Centre by the main road.

La Mare de Carteret School site adjoins the Local Centre boundary with the result that the Centre has easy access to a primary school and a secondary school although following the transition to two colleges, the future use of the High School part of the site is currently unknown (and for clarity, this lies outside the Local Centre boundary).

In terms of relevant planning applications in 2018, the following applications were approved – there were no relevant refusals:

- Installation of a public access defibrillator at the Rockmount Hotel (supported by policy IP11: Small-scale infrastructure provision);
- Demolish store and two existing garages. Erect a 2.5 storey extension (east elevation) comprising retail at ground floor level with two 1 bedroom apartments above. Extend above existing flat roof (west elevation) to create a two bedroom apartment (as noted in the General Convenience Retail section of this report – supported by policies LC2: Housing in Local Centres and LC5: Retail in Local Centres);
- Change of use of agricultural land to domestic curtilage (approximately 350m^2 at Warma, Cobo, supported by policies OC5(B): Agriculture Outside of the Centres – outside the Agriculture Priority Areas, GP15: Creation and Extension of Curtilage and GP1: Landscape Character and Open Land);
- Erect 13 new dwellings with associated car parking, amenity areas and landscaping and new vehicular access (supported by Policy LC2: Housing in Local Centres and the approved Development Framework for Warma); and
- Approval of a proposal to demolish and replace an existing dwelling and extend the associated domestic curtilage at La Roseliere, Route de Cobo (supported by policies GP13: Householder Development, GP15: Creation and Extension of Curtilage and GP8: Design).

The application for 13 new dwellings was considered against the IDP policy framework and the approved Warma Development Framework (October 2017) which was in place at the time of determination of the planning application. The Warma Development Framework (October 2017) has since been superseded as adjacent land to the west of Warma, known as 'Mycroft', was put forward for development which resulted in the approval in December 2018 of an amended Mycroft/Warma Development Framework which covers both areas of land. Any further applications for residential development on either the Warma or Mycroft sites will be expected to be consistent with the Mycroft/Warma Development Framework (December 2018) to ensure comprehensive development of the site.

<u>L'Islet Local Centre</u>

L'Islet is the third largest of the Local Centres and the most densely populated. The Centre is reasonably well served, with 2 churches, convenience stores and cash point but there are no amenity areas, banks or doctor's surgery within the Local Centre boundary. There are opportunities for employment and the number of vacant units recorded had reduced in 2018 compared to 2017 (4 vacant units compared to 6). The public realm is traffic dominated and there is limited pedestrian and cycle infrastructure. As such the Local Centre would benefit from public realm improvements. Similar to Cobo Local Centre, there is no defined amenity area within the Local Centre boundary, but there is easy access to the coast and beach.

There were several relevant planning decisions within L'Islet Local Centre during 2018. These were as follows:

- A new dwelling at Rose Cottage (supported by Policy LC2: Housing in Local Centres);
- A new dwelling on a site at Route De Picquerel (supported by Policy LC2: Housing in Local Centres); and,
- A proposal to demolish an existing workshop and erect a two storey building for retail use (ground floor) and residential unit (first floor) was refused (as discussed in the 'General Convenience Retail' section of this report).

Forest West Local Centre

Forest West Local Centre lies to the west of the airport and at the time of survey had 7 of the 10 indicators present. There are 2 schools, a convenience store and petrol station and a variety of facilities and opportunities at the Mallard complex, including the cinema, hairdresser and restaurant. Overall, for the size of the Centre, Forest West appears reasonably well provided for although there is a lack of amenity areas and no doctor's surgery.

There were no relevant planning applications determined in 2018 in Forest West Local Centre.

St Pierre Du Bois Local Centre

St Pierre Du Bois Local Centre is the least densely populated of the Local Centres but it has a range of services and facilities including post office, pub, food hall, doctor's surgery, pharmacy and amenity areas. There is no primary school, and no pre-school was noted at the time of survey. Since the Centre was identified, the bank has closed and this unit remained vacant at the time of survey. 2018 saw an increase in bus service provision in the Local Centre with the introduction of route 62 and the N3 night bus, and consultation was undertaken on additional measures to improve pedestrian safety (i.e. consultation on a raised table at the junction of Route de Longfrie and Route de Lihou).

Relevant planning applications determined in 2018 included:

- Change of use of caretaker's flat to community centre use at Styx (LC3(A): Social and Community Facilities in Local Centres – New, Extension, Alteration or Redevelopment of Existing Uses and GP12: Protection of Housing Stock); and,
- Installation of new and replacement signage at St Peter's Food Hall (as described in the 'General Convenience Retail' section of this report).

L'Aumone Local Centre

L'Aumone Local Centre, whilst not the smallest of the Local Centres, has only 5 of the 10 indicators present. However it remains an important Local Centre and the facilities appear to be well used, serving a reasonably densely populated area which also has good bus connections to other parts of the Island. There is a doctor's surgery, pharmacy, convenience store and petrol station, as well as a hairdressers and cash point. There was no school or pre-school, post office, amenity areas or community facilities in L'Aumone at the time of the survey. The pedestrian environment was considered to be good as there are pavements on

both sides of the road and there is a pedestrian crossing on the main route through the Local Centre.

L'Aumone Local Centre lies adjacent to the Castel Hospital site and close to other sites of considerable size that are in States of Guernsey ownership. Where these sites are becoming obsolete or not fit for purpose there may be scope for considerable opportunities for development through IDP Policy S6: Strategic Opportunity Sites.

There was one relevant planning application determined in 2018, which was to demolish an existing dwelling and erect two new semi-detached dwellings which was supported by policy LC2: Housing in Local Centres.

In feedback for the 2018 AMR the C*f*H&SC made comments on an application relating to redevelopment of facilities at the doctor's surgery in L'Aumone. At the time of writing, this application is yet to be determined so it is not appropriate to comment at this time but the outcome will be reported in a future AMR as relevant. However Policy LC3(A): Social and Community Facilities in Local Centres generally supports the principle of such development.

Forest Local Centre

Forest is the smallest of the Local Centres in terms of land area, population and the number of dwellings. 5 of the 10 indicators were present at the time of survey. Forest Stores provides a strong anchor for the Local Centre which includes a post office, and there are 2 pubs, 2 churches and a pre-school. Access to a cash point, doctor's surgery and amenity areas could benefit the Local Centre, however there are good bus routes and the area is well linked to the airport, which in itself provides opportunities.

There were no significant planning decisions within Forest Local Centre during 2018, although there was an approval to refurbish and repair a window on the north elevation of the Forest Church at Le Bourg, as well as providing a hard surface on the existing front path. The new surfacing to the footpath will improve accessibility and the window repairs ensure that the building remains well maintained, preserving its contribution to the public realm. These proposals were supported by policies GP4: Conservation Areas, GP5: Protected Buildings, and GP8: Design.

Other issues

Overall, the Local Centres remain relatively well served, with most of the indicators listed in the IDP present in most of the Local Centres, as shown in Figure 2 below which is unchanged since 2017

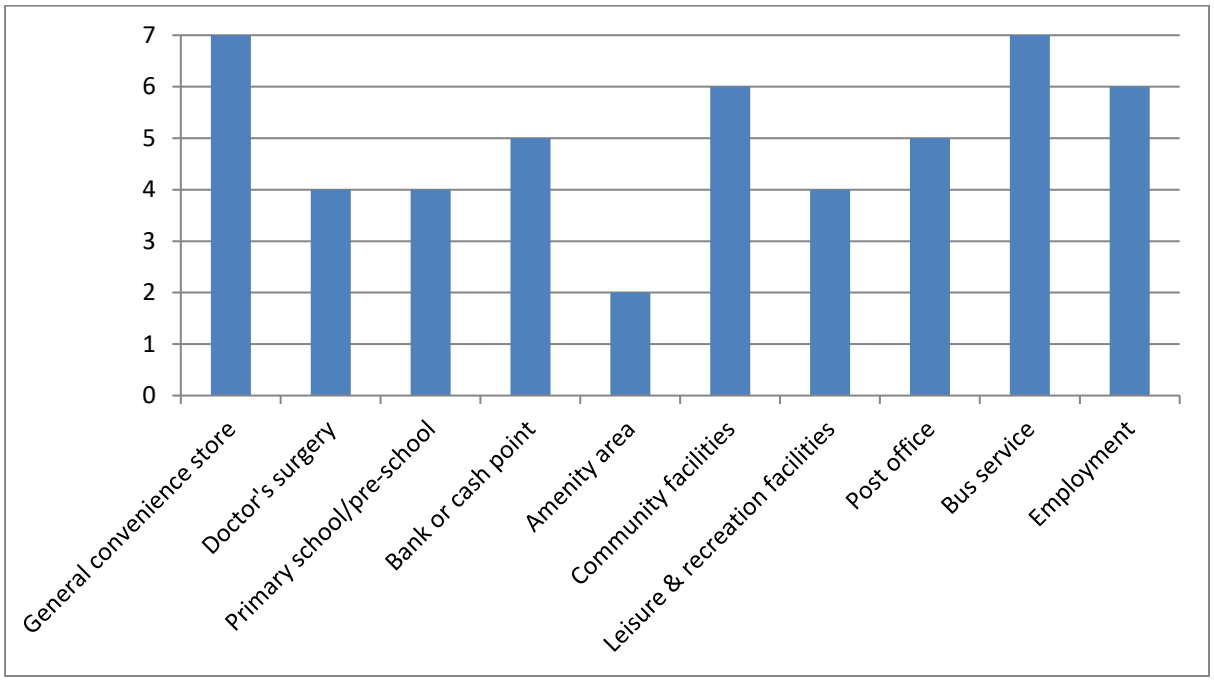


Figure 2: Number of Local Centres with one or more of each sustainability indicator

The provision of amenity areas within the Local Centres is limited to St Peter's and St Martin's (although the provision in St Martin's is also limited) so this is the indicator that appears to be most in need of addressing across most of the Local Centres. However, whilst there is a lack of amenity area provision in 5 of the Local Centres, access to the beach (in the case of L'Islet and Cobo) or to the countryside (particularly in the case of Forest and Forest West) may reduce the impact of this.

Community Plans (as described in the introduction of this report) could be used to further explore the provision of facilities and services within Local Centres to identify areas for improvement, which could then inform Development Frameworks where appropriate (for example in requiring access improvements to sites where they relate to the development proposed). At present there is still no updated retail study, although the Committee *for* Economic Development (C*f*ED), as noted in its feedback for the 2018 AMR, has prepared a draft Retail Sector Policy Statement. As yet the relevance of this statement for Local Centre retail is unknown as the draft is not yet available.

Accessibility is important in terms of the IDP objectives in relation to infrastructure and inclusivity, as well as the wider States objectives relating to health and wellbeing and is therefore of importance to the Local Centres. Reflecting this, a revised bus timetable was introduced in 2018 which saw an increase in routes serving the Local Centres, including night buses. As a result, all of the Local Centres were served by night buses on Friday and Saturday evenings for the duration of the 2018 timetable. 2018 also saw proposals to extend the 25 mile per hour speed limit for 'community hub areas', to broadly cover all Local Centres and Main Centre Outer Areas. The new speed limits were introduced on 7th April 2019 and may help to address the negative impacts of motor vehicles and improve accessibility in Local Centres. Pedestrian and bicycle infrastructure improvements could be made within all of the Local Centres to improve accessibility. Additionally, and to comply

with the Parking Standards and Traffic Impact Assessment SPG (2016), all new development is expected to make appropriate provision for bicycle, motorcycle and accessible parking.

2017 AMR Action Update -

- Liaise with the Committee *for* Economic Development in connection with the provision of a comprehensive Retail Survey to include exploration of the relevant roles of Local Centres – the CfED has prepared a draft Retail Sector Policy Statement but there is no further progress on a Retail Survey; and,
- Continue to monitor the mix and balance of uses in Local Centres – this will continue to be undertaken via the Local Centres Survey and published annually.

INDICATOR – Balance of provision in Local Centres		
Plan Objective		Plan Objective 4: Support a healthy and inclusive society.
Target		None.
Outcome	2018	There have been no significant changes in provision in the Local Centres in 2018 and all the Local Centres continue to have a clear and identifiable mix of uses.
	2017	All of the Local Centres currently have a clear and identifiable mix of uses. The purpose of monitoring is to assess the level of provision of facilities in Local Centres to ensure policies are used appropriately to maintain the appropriate level, range and balance of uses for community growth and the maintenance of sustainable centres.
Target met?		n/a
Comments (including any risks to delivery)		No Community Plans have been submitted in 2018 but these could further explore the provision of facilities and services within Local Centres to identify areas for improvement, such as amenity areas or pedestrian infrastructure
Action		Continue to liaise with the Committee *for* Economic Development in connection with the provision of a comprehensive Retail Survey and the development of the Retail Sector Policy Statement. Continue to monitor the mix and balance of uses in Local Centres as part of the Local Centres Survey and publish data annually.

Housing Development in the Local Centres

The IDP, in accordance with the SLUP, places an emphasis on providing limited opportunities for housing development in Local Centres to enable community growth and to reinforce them as socially inclusive and sustainable centres but requires that the scale of such development does not undermine the aims and objectives for the Main Centres and which complements the scale, setting and character of the Local Centre concerned. Development must also be of a scale that is compatible with the level of existing and planned services and

facilities available in that Centre. This approach reinforces the intention that Local Centres are not intended to be growth points.

Figure 1 at the start of this report shows the relative size, population and number of dwellings in each of the Local Centres, as well as an approximate residential density. These figures give an indication of the character of each of the Local Centres, in that the less densely populated, generally the more rural the character of the Local Centre. As shown by the data in Figure 1, there has been very little change in the Local Centres since their designation in 2016.

Regarding scale of development, the Local Centre boundaries in themselves place a limit on the amount of development that can take place in that they are drawn to allow only limited opportunities for development within the Local Centres. However further analysis of the character and settings of the Local Centres through the Stage 2 Character Study would be beneficial in order to assess whether proposals are complementary to the scale, setting and character of each particular Local Centre and this would be useful to inform Development Frameworks and planning applications in the future. At present, the Stage 2 Character Study has not been undertaken, with other workstreams taking priority.

In 2018 there were 8 approvals relating to new dwellings in Local Centres with a total of 20 new dwellings permitted. Since the adoption of the IDP, there have been a total of 13 approvals granting permission for 26 new dwellings in Local Centres. There are no trends to report as yet and there do not appear to be any significant implications.

There is no specific target within the IDP in relation to the proportion of development expected to take place in and around the Main Centres and elsewhere, though the former Environment Department set out during the Inquiry that around 80% of new dwellings would be located in and around the Main Centres and 20% elsewhere (in Local Centres and Outside the Centres). As stated this is not a target but an indication of how the IDP policies would deliver the spatial strategy in terms of housing development. During the Inquiry, the former Environment Department estimated that over 5 years the Local Centres are likely to provide sufficient land for around 150 additional dwellings. At the end of 2018 (that is, 2 years since adoption of the IDP), permission has been granted for 26 dwellings in Local Centres, which so far broadly reflects the estimate of 150 dwellings over 5 years.

To ensure that the policies are working as intended and the Spatial Strategy is being delivered, it will be important to continue to monitor the delivery of housing and other development within the Local Centres. The population of each Local Centre will also continue to be monitored.

2017 AMR Action Update -

- Undertake or commission Stage 2 of the Guernsey Character Study, including character studies of the Local Centres, to inform planning applications and monitoring – this has yet to be undertaken due to other workstreams taking priority; and,
- Continue to monitor the locational distribution of new dwellings and other development as well as the number of Development Frameworks coming forward in

the Local Centres and population – this has been carried out for 2018 and will continue to be ongoing.

INDICATOR – Number of dwellings and residential density in each Local Centre		
Plan Objective		Plan Objective 4: Support a healthy and inclusive society; Plan Objective 5: Ensure access to housing for all.
Target		None.
Outcome	2018	No significant changes in the Local Centres since the adoption of the IDP in 2016.
	2017	Annual changes will be recorded and trends will be noted over time. The baseline information has been gathered (as shown in Figure 1).
Target met?		n/a
Comments (including any risks to delivery)		The IDP allows for limited development within the Local Centres which complements the scale, setting and character of that particular Local Centre and is compatible with the level of existing and planned services and facilities.
Action		Undertake or commission Stage 2 of the Guernsey Character Study, including character studies of the Local Centres, to inform planning applications and monitoring. Continue to monitor the locational distribution of new dwellings and other development, as well as the number of Development Frameworks coming forward in the Local Centres and population trends.

INDICATOR – Local Centre population		
Plan Objective		Plan Objective 4: Support a healthy and inclusive society.
Target		None.
Outcome	2018	No significant changes to the population of the Local Centres since the adoption of the IDP.
	2017	Baseline data gathered and presented in Table 1.Population change will be recorded on an annual basis and trends presented in the AMR.
Target met?		n/a
Comments (including any risks to delivery)		Limited development in the Local Centres might be expected to result in limited increases in population of the Local Centres. Trends will be monitored over time.
Action		None.

Committee *for* Health & Social Care – Community Hubs

In 2017, the Committee *for* Health & Social Care's (C*f*H&SC) response to consultation for the AMR outlined a plan for a transformation programme for services in Guernsey. This will see an interconnected network of community hubs which will ensure a model of care with a greater emphasis on support and care within the community, with the focus being the user.

An update on Community Hubs is provided as part of the feedback from C*f*H&SC for the 2018 AMR. As reported in 2017, provided that they fit with the Spatial Policy, the principle of Community Hubs is supported by the policies of the IDP. The Authority has been liaising with the C*f*H&SC and liaison will continue in this regard.

2017 AMR Action Update – the 2017 AMR included an action for liaison with the Committee *for* Health & Social Care at officer and political level in connection with Community Hubs. This action is carried forward.

Summary

Based on the evidence gathered in 2018, the Local Centre policies appear to be functioning as intended to deliver the SLUP requirements and the States' priorities. Development approved has been appropriate to the scale of the Local Centre concerned, and policies have enabled consideration of proposals on a case by case basis relative to the Local Centre involved. The wording of the policies effectively allows for provision for community growth and sustainable centres, providing for a range of supporting uses of appropriate scale whilst protecting against the loss of essential facilities. At the same time, the policies guard against over provision or development which goes beyond what is required by that Centre and which might adversely impact on the vitality and viability of the Main Centres.

Summary of Monitoring Requirements

- Continued monitoring of general convenience store provision in Local Centres;
- Continue to monitor the mix and balance of uses in Local Centres as part of the Local Centres Survey and publish data annually; and,
- Continue to monitor the locational distribution of new dwellings and other development, as well as the number of Development Frameworks coming forward in the Local Centres and population trends.

Summary of Actions Required

- Consideration of reviewing Les Capelles as a Local Centre at the time the IDP is reviewed;
- Liaise with the Committee *for* Economic Development in connection with the provision of a comprehensive Retail Survey to include exploration of the relevant roles of Local Centres and the development of the Retail Sector Policy Statement;
- Undertake or commission Stage 2 of the Guernsey Character Study, including character studies of the Local Centres, to inform planning applications and monitoring; and,
- Continue to liaise with the Committee *for* Health & Social Care in connection with Community Hubs.

Agriculture and Horticulture

Introduction

In relation to Agriculture and Horticulture, the policies in the Strategic Land Use Plan (SLUP) focus on protecting large areas of contiguous agricultural and other land (including redundant glasshouse sites) where likely and able to contribute to the agricultural industry. Policies also support proposals that allow the extension of horticultural operations that are beneficial to the industry, recognising that horticultural operations have reduced in number and are consolidating on fewer, larger sites. Inevitably this has led to an increasing number of redundant glasshouse sites, and where those sites are not contiguous with other large areas of agricultural land, there is scope for them to be used for purposes other than for agriculture (Policies LP13: Redundant Glasshouse Sites, SLP8: Agriculture and SLP9: Horticulture).

These themes are reflected in Island Development Plan (IDP) policies which support and prioritise agricultural use within the Agriculture Priority Area (APA). The APA is a policy approach designed to maintain and protect the most important, large areas of contiguous agricultural land and other areas well related to agricultural operations as directed by the SLUP (including redundant glasshouse sites within and adjacent to the APA) by prioritising agricultural use. Such land is expected to remain in (or revert to) agricultural use unless it can be demonstrated that the site cannot positively contribute to the commercial agricultural use of the APA or cannot practically be used for commercial agricultural use without adverse environmental impacts (Policy OC5(A): Agriculture Outside of the Centres – within the Agriculture Priority Area).

Outside the APA, agricultural proposals relating to an existing farmstead or agricultural operation are supported, though the development of new farmsteads is not generally supported. Development which would result in the loss of an existing farmstead or agricultural buildings or land will be supported where the new use accords with other relevant policies in the plan (Policy OC5(B): Agriculture Outside of the Centres – outside the Agriculture Priority Areas).

Other policies in the IDP set out the criteria against which changes from agricultural land and buildings to other uses will be supported. These relate to, for example, the extension of curtilage (Policy GP15: Creation and Extension of Curtilage), the conversion of redundant agricultural and horticultural buildings (Policy GP16(A): Conversion of Redundant Buildings) and relevant appropriate uses as set out in the Outside the Centres section of the IDP.

In relation to the horticultural industry, consistent with the SLUP, IDP policies generally support the principle of development which relates to the viability of an existing horticultural business. Whilst redundant glasshouse sites are expected to revert to agricultural use, there are provisions in policy to allow for other uses under certain circumstances (Policy OC6: Horticulture Outside of the Centres and Policy OC7: Redundant Glasshouse Sites Outside of the Centres). Redundant glasshouse sites are discussed in detail in the Redundant Glasshouse Sites Report.

The overall emphasis of SLUP and IDP policy is to balance the protection of land for agriculture for the industry's current and future needs and recognising the role it plays in countryside management with ensuring land is available to meet other legitimate development requirements. In relation to horticulture, the emphasis of SLUP and IDP policy is to support existing horticultural businesses whilst managing the general decline of that industry and the resultant redundant glasshouse sites.

Within this report, agricultural land is taken as the legal definition, where land, other than that used as a garden, is considered as agricultural where it is used, or is capable of being used (with the application of good husbandry), for dairy farming, livestock or market gardening, and includes land that is or was covered by a glasshouse. Accordingly, the planning applications discussed cover a range of land that technically falls under the agricultural definition and is assessed as such, but it does not suggest that all (or any) of this land was actively farmed. All of the applications in this section fall Outside of the Centres.

Appeals within the Agriculture Priority Area

During 2018, 2 appeals[1] were determined relating to agricultural land within the APA. The first of these appeals was lodged against a Compliance Notice which alleged that a material change of use of land had occurred from agricultural to a mixed use of agriculture and domestic curtilage (garden), comprising the parking of vehicles. The appeals panel found that the alleged breach of change of use to domestic garden had not taken place. The panel did not dispute that the land had been used for the parking of vehicles, but it considered that the notice did not allege this. The appeal was allowed and the Compliance Notice quashed.

The second appeal related to a refusal of the proposal "Extend domestic curtilage and create driveway to south-east of dwelling". During the course of the appeal hearing, however, the description of development was amended to change the use of an existing agricultural access way to a combined residential and agricultural access way, together with the construction of a new section of driveway from that access to a separate dwelling.

Whilst the Appeals Panel used a different approach in terms of policy applied to that used by the Authority, ultimately it reached a similar conclusion that the proposed development may have a harmful impact on agriculture. The Appeals Panel also found that the proposal could not be considered a Minor Departure, concluding that: "…it could in simple terms be repeated too often, such that the cumulative impact could be very significant in terms of loss of agricultural potential and urbanising effect. We are of the opinion that to allow such development other than in strict conformity with the Aims, Objectives and Policies of the IDP would set a very undesirable precedent in that regard. We therefore do not agree with the appellant that the development should be regarded as a minor departure for the purposes of Section 12(2) of the General Provisions Ordinance."

Although the appeals panel placed significant emphasis on the description of development in this case, it did not imply that Policy GP15: Extension of Domestic Curtilage does not remain fit for purpose at this time. However at the point of review of the IDP it may be

[1] For full appeal decisions: https://www.gov.gg/article/164841/2018-Appeal-Decisions

appropriate to consider the Appeals Panel conclusion that curtilage is a status of land rather than a use and to clarify the wording of this policy accordingly. The Planning Tribunal took the view that 'curtilage' in itself is not a defined land use (and as such isn't in the Use Classes Order) and the 'use' of curtilage is determined by the relationship of the land to a building. As such, in a case such as this an 'extension of domestic curtilage' is actually an application for 'change of use of agricultural land to domestic garden'. As a result of the appeal decision, the description of development on planning applications in such cases will now refer to 'change of use of land' rather than 'extension of curtilage'.

Action - Consider review of wording of Policy GP15: Creation and Extension of Curtilage in relation to the issues raised by the Appeals Panel when the IDP is reviewed.

Planning approvals in the APA

The APA encompasses both agricultural and non-agricultural land and uses, however for the purposes of the AMR, applications in the APA that relate to established non-agricultural uses (for example alterations to existing dwellings or replacement dwellings where there is no change to curtilage size) or do not impact on land area (for example new fencing or boundary treatments) are not included as they have no impact on the overall amount of agricultural land within the APA. Horticultural proposals and applications which affect horticultural land and buildings are included because this land is considered agricultural for the purposes of Planning Law and is expected to revert to agricultural land.

Therefore the relevant planning approvals fall into the following categories:

- Agricultural proposals;
- Horticultural proposals;
- Change of use of agricultural land;
- Change of use of horticultural land;
- Conversion of agricultural buildings; and,
- Conversion of horticultural buildings.

There were a total of 46 relevant planning applications within the APA determined between 1st January 2018 and 31st December 2018. This comprised 40 approvals and 6 refusals. 4 of these proposals related to redundant glasshouse sites within the APA (3 of these were approved).

Figure 1 shows the breakdown, by application type, of applications decided within the APA during 2018.

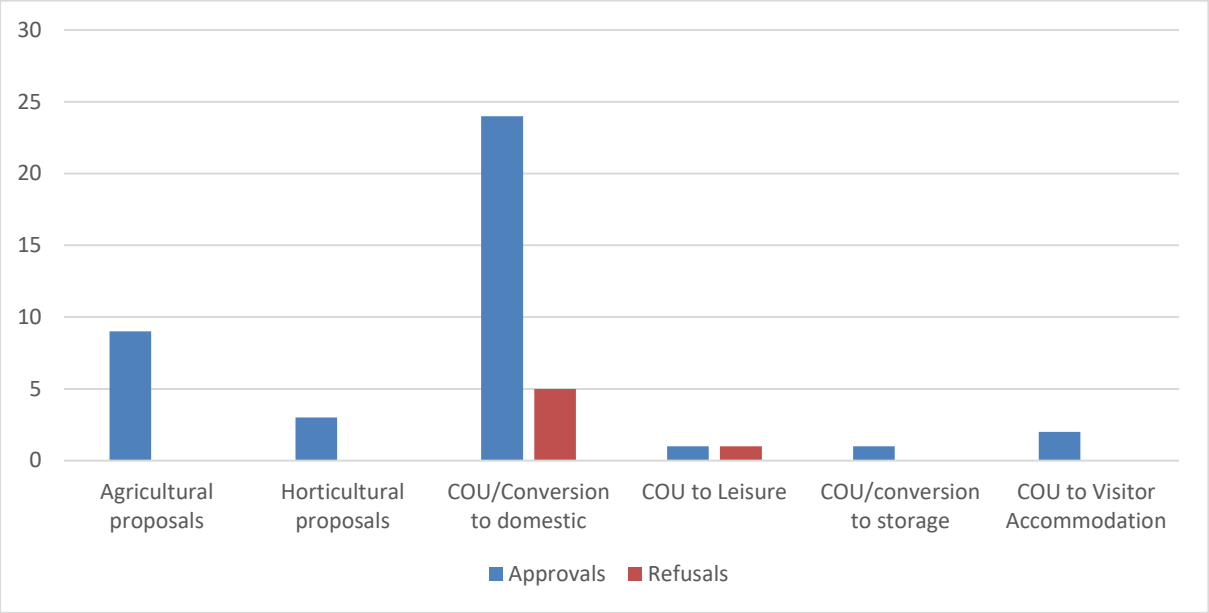


Figure 1: Relevant planning applications decided within the APA during 2018 by type (COU = Change of Use)

For clarity, for the purposes of this report, change of use applications relate to a change of use of land, whereas conversions relate to the conversion of a redundant building. Applications for the conversion of redundant buildings often incorporate the change of use of an area of land around the building to form the curtilage (e.g. domestic garden in the case of a conversion to residential use), so to avoid double counting these are grouped together in the figures above.

The 2018 approvals included 9 agricultural and 3 horticultural proposals. The agricultural proposals included replacement buildings such as agricultural stores, small scale infrastructure related to hobby farming (such as sheds and pens relating to rearing Guernsey goats), improvements to an access in order to bring land back into active agricultural use, and ancillary developments supporting diversification relating to the principal agricultural use. The horticultural proposals included cladding of a section of a glasshouse, replacement outbuildings and improved access arrangements.

The remaining applications were for change of use of land or the conversion of buildings away from agricultural or horticultural use. Figure 2 shows the approximate area of land granted approval to change from agricultural to other uses within the APA (m^2) in 2018. As before, conversions are included in this figure as the proposals are often accompanied by an element of curtilage (for example the conversion of a redundant building to a dwelling with associated domestic garden).

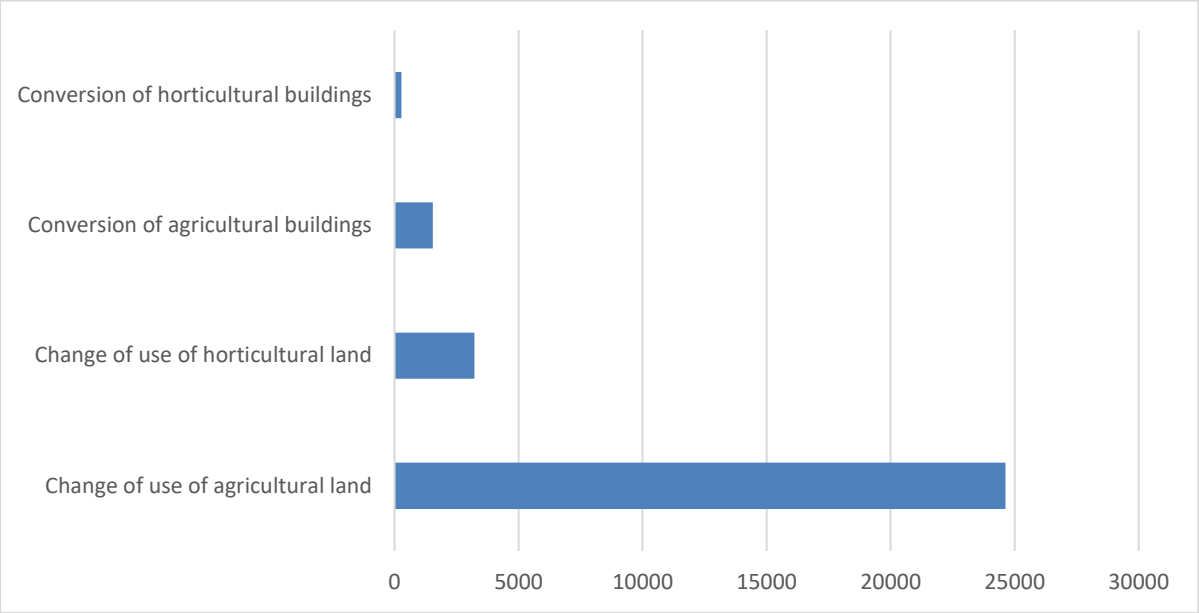


Figure 2: Approximate area of land granted approval to change from agricultural to other uses within the APA (m^2) in 2018

Where a change in the use of land was approved, this involved approximately 18.1 vergées of land (2.9 hectares or 29,000m^2). The largest single approval for change of use involved an area of 5.1 vergées (8.4ha or 8,400m^2) for a 'glamping' site. Of the 2.9 hectares in total, approximately 2.1 hectares of agricultural land gained approval to change use to domestic garden in 2018, the largest of which related to change of approximately 1.27 vergées (0.2ha or 2,095m^2). 1 of the approvals on a redundant glasshouse site includes a condition to remove approximately 4.3 vergées (0.7ha or 7,000m^2) of redundant glass, of which 3.9 vergées (0.6ha or 6,380m^2) is to be returned to agricultural use.

2 applications for leisure related uses were decided, 1 of these was approved for a stable block (amounting to approximately 0.1 vergées (0.02ha or 240m^2) including the stable block and yard), and the second application, relating to the erection of a greenhouse for allotment gardening, was refused.

1 approval was for the conversion of redundant agricultural buildings for storage, which provided 980m^2 of storage floorspace, and finally there were 2 approvals for use of land as campsites – 1 of these was the making permanent of a previous temporary permission, the second was for a 'glamping' site, the total site measuring approximately 5.1 vergées (0.84ha or 8,400m^2).

The location of the planning approvals within the APA are shown in Figure 3 below. Given the scattered nature of the approvals, there do not appear to be any significant implications derived from the distribution of the approvals.

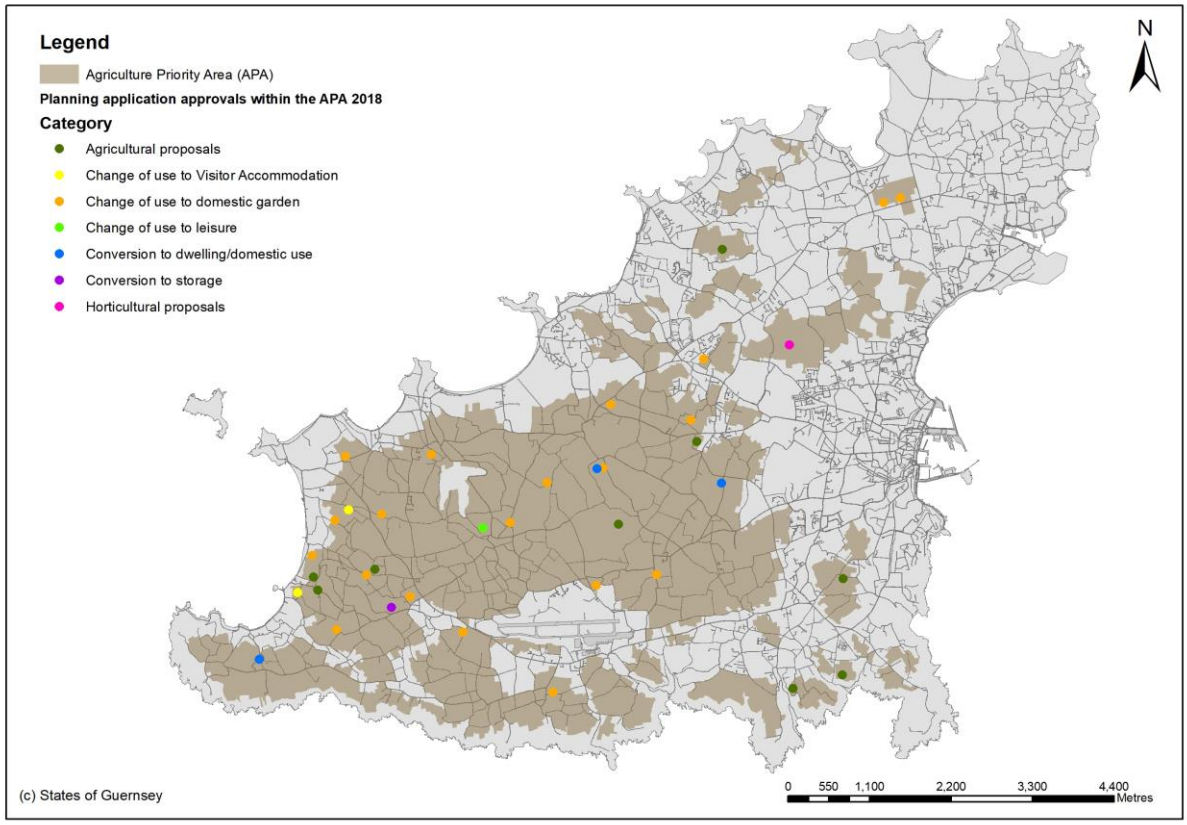


Figure 3: Location of planning approvals within the APA

Applications for change of use from agricultural land to domestic curtilage make up the majority of approvals, and given the number of applications involved, further review has been carried out to ascertain the type of land which is being granted approval to change use to domestic garden.

As part of the planning application process for development within the APA, applicants must demonstrate that the land in question meets certain criteria which ensures that only land that has been demonstrated to be no longer required for agricultural purposes or cannot make a positive contribution to an identified APA can change to other uses away from agriculture.

The following is a range of matters that may be considered when assessing the contribution of land to the commercial agricultural use of an APA:

- What the requirements of the agricultural industry are at the time;
- The condition of the land (is it able to be used for agriculture or if not what may be required to make it available for cultivation or grazing);
- The size of the site/piece of land;
- How the site relates to existing agricultural holdings;
- Access;
- Topography;
- Drainage; and,
- The nature of the proposed use (will the proposed use allow the long term use of the land for agriculture to remain).

This is not an exhaustive list, and although these criteria are used for guidance by the Planning Service when considering planning applications, no formal guidance has been published. However the above list provides for consistency across consideration of planning applications.

As part of the planning application process therefore, this guidance has been used to inform an assessment against policies in the IDP to establish whether or not a change of use away from agricultural use would be appropriate.

Whilst every case is unique, there are several common themes with regard to change of use of agricultural land in the APA, although not every application falls into one of these categories, particularly those where the decision is more finely balanced. These themes are broadly as follows:

- Proposals where the land involved has historically been associated with glasshouses to the rear of dwellings and there are often established boundary features separating the site from surrounding agricultural land where the removal of boundaries would cause unacceptable adverse environmental impact. In some of these cases there are additional limitations on access.
- Proposals on sites where the topography of the site (for example steep changes in levels) is such that the land cannot practically be used for agricultural purposes.
- Proposals where the extension of curtilage has been justified because of the potential to enhance the agricultural use of a wider area of land, for example through the removal of redundant glasshouses, the improvement of vehicular access for agricultural vehicles, or the clearer definition of boundaries between domestic and agricultural land.
- Proposals where the agricultural land involved is largely covered by redundant outbuildings whose conversion to residential use is supported and a limited amount of curtilage associated with the approval is supported by the IDP policies.

Consideration is also given to the impact on the landscape character type, local distinctiveness and the open landscape of proposed changes of use of agricultural land to domestic garden. In some cases, the potential impact on the openness of an area has resulted in the inclusion of a condition requiring that planning permission must be sought for development that would ordinarily be considered exempt from the requirement to apply for planning permission.

Where the applicant has been unable to demonstrate that the site cannot positively contribute to the commercial agricultural use of an APA or cannot practically be used for commercial agriculture within an APA without unacceptable adverse environmental impacts, then the application has been refused.

In accordance with the SLUP, the purpose of the APA is generally to maintain the most important, large areas of contiguous agricultural land and other areas well related to agricultural operations. The IDP, following the direction of the SLUP, endeavours to provide for sufficient land to meet the current and future needs of the agricultural industry balanced

with the needs of other legitimate uses (currently approximately 8000 vergées for dairy, plus 1500 vergées for arable/other livestock).

At the time of adoption of the IDP, there was approximately 12,184 vergées of land in agricultural use, and 10,685 vergées of this (87.7%) fell within the APA. The 2018 Habitat Survey is now complete and, once reported, analysis of that data will show how much land is in active agricultural use both within the APA and outside the APA. However given the amount of land that has been granted approval to change use away from agriculture since the adoption of the IDP (a total of approximately 37.1 vergées within the APA) and that very little, if any, of this land was in active agricultural use at the time of adoption of the IDP, it is anticipated that the SLUP requirements will continue to be met.

A more detailed analysis of the requirements of the dairy industry, however, is given later in this thematic report, as well as consideration of whether amendments may be needed to the APA or to the direction given by the SLUP in order to meet the needs of the industry. Additionally, a full appraisal of the change of use of agricultural land outside the APA is also presented.

On a separate issue, feedback for the AMR from the States' Trading Supervisory Board expressed concern that some policies in the IDP including those relating to the APA were too restrictive in relation to renewable energy infrastructure. Attention was drawn to the wording of the APA policy where it restricts the loss of existing farmsteads or agricultural holdings to specific circumstances, and also to where policy IP1: Renewable Energy Production supports only subterranean infrastructure on greenfield land. This area of policy needs to be carefully balanced, respecting the objectives of maintaining the openness of the locality and protecting agricultural land whilst enabling the development of renewable energy infrastructure where appropriate, but it has yet to be thoroughly tested through the planning application process. Whilst the outcomes will be carefully monitored, there do not appear to be any reasons at present to amend the policies in this regard.

Action – Continue to monitor approvals and refusals within the APA to identify trends and ensure that sufficient land remains available for agricultural use.

2017 Action Updates -

- Publication of Supplementary Planning Guidance on applying for planning permission in the APA in order to assist applicants and agents – this guidance has yet to be published although the Planning Service continues to offer informal advice at pre-application stage; and,
- Investigate methods to obtain clearer data on the amount of agricultural, horticultural and undeveloped land within the APA – analysis of the 2018 Habitat Survey, once published, will provide comprehensive data on land use, including that within the APA.

INDICATOR – Provision of agricultural land in the APA		
Plan Objective		Plan Objective 1: Make the most efficient and effective use of land and natural resources. Plan Objective 2: Manage the built and natural environment.
Target		Provision of sufficient land to meet the current and future needs of the agricultural industry whilst allowing other legitimate uses (currently approximately 8000v for dairy, plus 1500v for arable/other livestock).
Outcome	2018	Applications relating to existing agricultural and horticultural holdings have been supported within the APA, whilst change of use and conversions away from agricultural use have been approved where policy tests were met. Approximately 2.9 hectares (18.1 vergées of land) were granted approval to change to alternative uses in 2018. Where redundant glass is proposed to be removed in connection with the implementation of a planning approval, 0.6 hectares of land has been returned to agricultural use. Other approvals were justified because of their potential to enhance the agricultural use of a wider area of land. Approximately 15,765 vergées of land in the APA remains in the same use since the adoption of the IDP (that is, has not been the subject of a planning approval for change of use or conversion).
	2017	Applications relating to existing agricultural and horticultural holdings have been supported within the APA, whilst change of use and conversions away from agricultural uses have been approved where policy tests met. 15,783 vergées in the APA remain unchanged since the adoption of the IDP.
Target met?		Yes
Comments (including any risks to delivery)		Based on the current evidence, there remains sufficient land available within the APA to meet the needs of the agricultural industry.
Action		Continue to monitor approvals and refusals within the APA to identify trends and ensure that sufficient land remains in agricultural use. Publication of Supplementary Planning Guidance on applying for planning permission in the APA in order to assist applicants and agents. Analysis of the 2018 Habitat Survey data to provide comprehensive data on land use, including that within the APA, and including agricultural, horticultural and undeveloped land.

Agricultural land and buildings outside the APA

The number and type of planning approvals on agricultural land and buildings outside the APA is monitored to assess the effectiveness of IDP policies, which allow for the loss of farmsteads, agricultural buildings or land outside the APA where it is demonstrated that the

new use accords with the other relevant policies of the IDP (Policy OC5(B): Agriculture Outside of the Centres – outside the APA) in achieving the balance required by the SLUP of agricultural uses and other legitimate uses. Additionally, it is important that the right land is protected by the APA designation, and looking at applications outside of the APA may give an indication as to whether or not the APA boundary should be amended (for example if there are clusters of agricultural applications, or conversely, clusters of applications to change away from agricultural use on land known to be tenanted by farmers but which did not meet criteria for APA designation). The scattered and intricate nature of the field pattern in Guernsey means that a proportion of agricultural land in active use lies outside the APA. This land is still afforded protection against inappropriate development through policies in the IDP but agricultural use is not prioritised in the same way as it is within the APA and the policy tests differ.

As with applications within the APA, only relevant planning applications have been assessed which are:

- Agricultural proposals;
- Horticultural proposals;
- Change of use of agricultural, horticultural or open land; and,
- Conversion of agricultural or horticultural buildings.

A total of 92 relevant planning applications were determined in 2018, 87 of which were approved and 5 were refused.

Figure 4 shows the number of applications decided by type outside the APA in 2018.

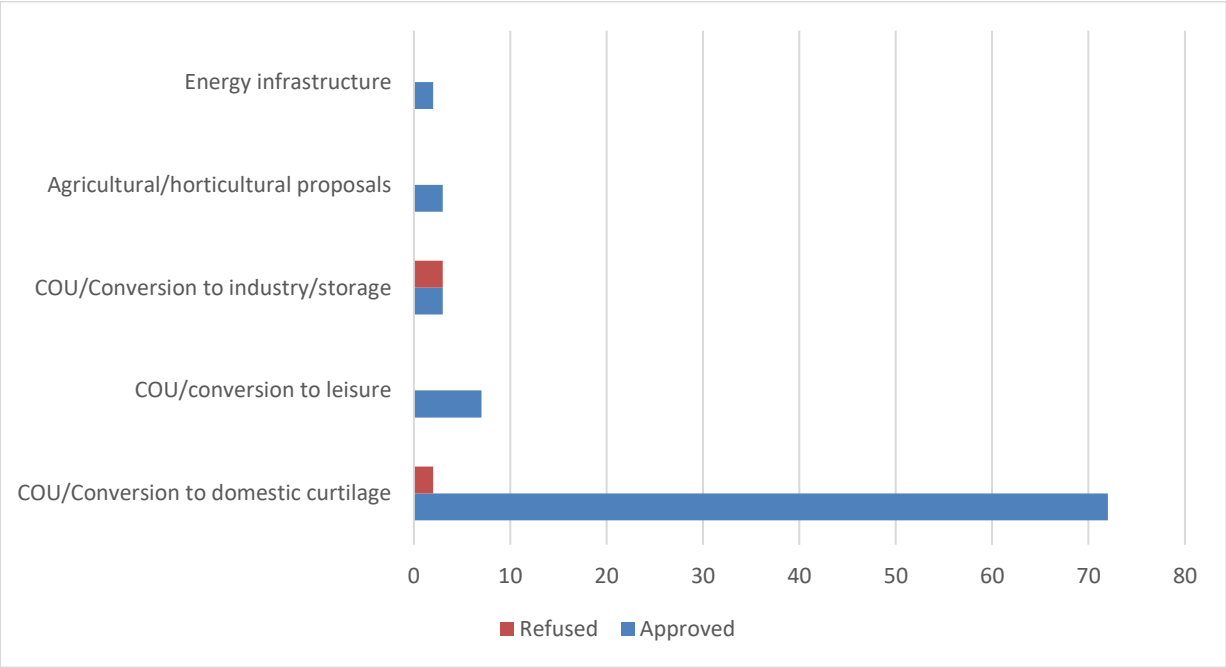


Figure 4: Number of planning applications determined on agricultural land outside the APA by type (2018)

The majority of applications (74) were for the extension of domestic curtilage and/or the creation of domestic curtilage associated with the conversion of a redundant building. Of the remaining 18 applications, 3 were for agricultural or horticultural proposals relating to existing operations, 6 were for proposals relating to industry/storage, 7 were for changes of use to leisure or recreation, or for proposals associated with leisure use (such as storage or maintenance of equipment). 2 applications related to the installation of energy infrastructure.

The 3 approvals relating to industry or storage & distribution included the change of use of a glasshouse site for the drying and processing of seaweed for the production of slug repellents and fertiliser products, a change from horticulture to light industry and a change from horticulture to general storage and distribution. 3 applications for storage and distribution were refused. Of the 7 proposals for changes to leisure and recreation, this included 2 approvals for the temporary siting of caravans associated with the West Show and the North Show, plus storage of equipment for the West Show. A new indoor riding facility and sand school was approved on Fort Road.

Figure 5 shows the location of planning approvals outside the APA. There do not appear to be any significant implications as a result of the spatial distribution of the approvals, although as in 2017, it is noted that there are several approvals close to or adjoining the APA designation.

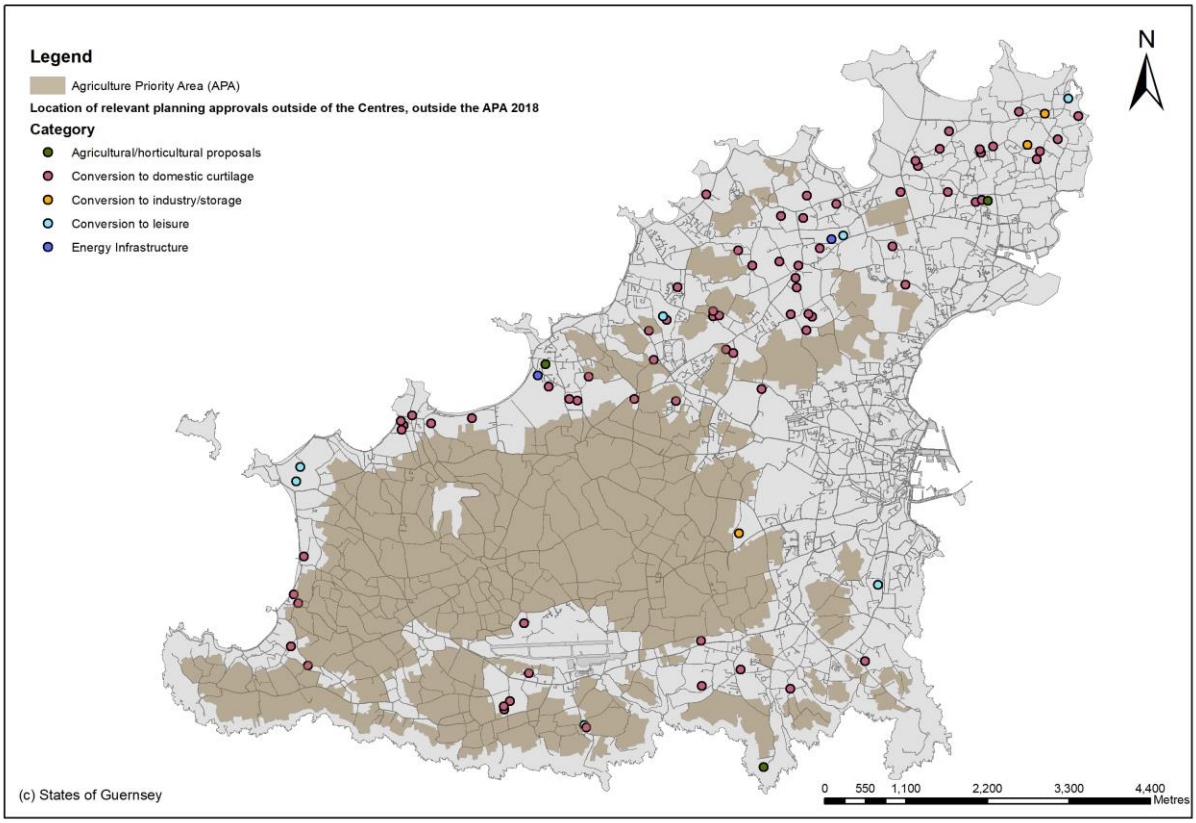


Figure 5: Location of relevant planning approvals Outside of the Centres, outside the APA

Clearly the greatest number of applications were for the change of use of land to domestic curtilage, including the creation of domestic curtilage associated with the conversion of

redundant buildings. Of the 74 applications determined, 72 were approved and 2 were refused. As for land within the APA, the applications have been reviewed to identify any trends or issues arising.

In total, the change of use of agricultural land to domestic curtilage outside the APA totalled approximately 76.3 vergées (12.4 hectares or 124,000m^2), the largest of which was for 8.28 vergées (1.35ha or 13,577m^2). This is an increase from 2017, where approximately 53 vergées of land (8.7 hectares or 87,000m^2) gained permission to change use to domestic curtilage. In 2018, 13 of the sites were considered redundant glasshouse sites according to the definition in the IDP, with a further 40 plus sites being former glasshouse sites (with glass removed between the 1970s and 2016). These sites were situated predominantly to the rear of dwellings, often with mature boundaries, and the land frequently had a domestic appearance as they had been managed as lawn for some time, in some cases decades, since the glasshouses were cleared. Frequently neighbouring residential dwellings also have gardens to the rear that were formerly covered with glasshouses. Because of this, the majority of proposals (over 40) were not visible or were only partially visible from public space because they were screened by residential dwellings so did not detract from the open landscape quality.

Several sites were associated with the conversion of redundant buildings where the provision of curtilage was considered reasonable given the policy support for the conversion of the building. It is harder to generalise the characteristics of the remaining sites, however there were several where the land involved was formerly covered by glasshouses and had been managed as lawn for many years, often at the side of a dwelling. In cases where there was potential for impacting on the openness of the landscape through household development that might otherwise be considered exempt from requiring planning permission, conditions were attached to approvals removing exemption rights to ensure that the openness of the landscape was not compromised.

Since the adoption of the IDP, Outside of the Centres a total of approximately 23.8 vergées (3.9ha or 39,000m^2) of land within the APA gained approval to change to domestic curtilage, and 138.5 vergées (22.7ha or 227,000m^2) of land outside the APA has been granted approval to change to domestic curtilage.

Several issues have been raised in feedback for the AMR relating to the change of use of agricultural land to domestic garden.

Firstly, the initial findings of the Habitat Survey 2018 have noted that the change of use from agricultural land to domestic garden can have both ecological and socio-economic impacts. Biologically it can affect biodiversity depending on the intensity of management, and socio-economically as the land may have greater economic value as domestic curtilage than as agricultural land. The initial findings of the Survey suggest that in 2010 134ha (822v) of extensions to curtilage were identified, and a further 188ha (1,147v) of new extensions were identified in 2018. The preliminary conclusions on this matter in the Survey note that there is a risk to the wider biodiversity of the island both via intensive management of the land as domestic curtilage and potentially through an increase in the intensity in which remaining agricultural land must be managed.

La Société Guernesiaise expressed concern that there had been a considerable increase in planning applications to extend domestic curtilage under the IDP and that some, although not all applications, could lead to a loss in biodiversity. La Société consider that such applications should be routinely assessed in terms of their current habitats and wildlife value to ensure that species-rich land is not being lost in this way. The feedback also notes that there has been a steady increase in the number of agricultural fields which are bought by neighbouring landowners and then managed as extensions of gardens, typically by mowing the land intensively to create lawns. La Société recommend that this issue is looked into to determine if the definition and permissible uses of agricultural land can be refined in order to prevent this damaging activity, and draw attention to such controls already existing in Jersey.

Both La Société and the draft 2018 Habitat Survey findings note that agricultural intensification and inappropriate land management leads to a loss of biodiversity. However, as inferred in the response from La Société, planning permission is not always required for alternative land management techniques, for example the planting of hedges, trees and flowers or the mowing of grass does not generally involve works constituting development under the Planning Law and is therefore outside of the remit of the Authority. The update on the Biodiversity Project Fund from the Committee *for the* Environment & Infrastructure (C*f*E&I) provides information on the Pollinator Project, where the team has met with the farming community to discuss appropriate hedging on farms. An update on Habitat Action Plans was also given, including the timeline for the review and publication of the Farm Biodiversity Action Plans report (due to be published by the end of Q4 2018, resources permitting). Additionally, work is also progressing on formulating General Habitat Action Plans for areas other than Areas of Biodiversity Importance and Sites of Special Significance.

In cases where proposals do require planning consent, paragraph 19.16.9 of the IDP states "Proposals for extending or creating curtilage should not result in an unacceptably negative impact on natural habitats. Where necessary, proposals will be required to demonstrate that there would be no significant detrimental impact in this regard and that, where necessary, such impacts can be mitigated". As such there may be cases where the applicant is required to undertake an assessment of the biodiversity of a site prior to the determination of an application. This is also in accordance with the purposes of Planning Law which include to preserve and promote biological diversity.

Further emphasis on biodiversity may emerge as a result of the Policy Letter from the Policy & Resources Committee 'Policy & Resource Plan – 2018 Review and 2019 Updates' which will be debated by the States in June 2019. The Policy Letter states that "Government must continue to reduce Guernsey's contribution to global climate change through the policies it develops and the services it delivers. It has made a good start with many factors relating to climate change included in existing work streams such as energy policy, hydrocarbons supply programme, renewables, integrated transport strategy, waste strategy, biodiversity strategy and the long-term infrastructure investment plan". The States are asked to decide if a policy priority area should be 'mitigate climate change' and if the C*f*E&I should develop a climate change policy and a 'Climate Change Action Plan' in a Policy Letter no later than May

2020. The implications for the IDP of the outcome of this debate and any subsequent plans for climate change will be considered in future monitoring.

The 2018 Habitat survey will be a useful tool for the Planning Service to be able to identify important habitats alongside other technical evidence such as the Guernsey Character Study Stage 1 and historic aerial photographs which support informed decision making. As noted in feedback from the (C*f*E&I), the survey report will identify the highest priority habitats and species for conservation action.

Policy GP15 requires that the contribution of a site to the commercial agriculture of an APA should be considered along with the potential environmental impacts of the site contributing to commercial agricultural use (the site does not have to fall within the APA to make a contribution). However it would follow that if environmental impacts prevented the land from contributing positively to the commercial agricultural use of the APA, for a proposal for an alternative use to gain approval the environmental impacts would need to be less than those associated with returning the land to agricultural use.

Given the text in paragraph 19.16.9 of the IDP and the purpose of the law, there appear to be sufficient tools in the policy and legal framework to ensure that biodiversity of a site is taken into consideration. Therefore it is not considered that any policy changes are necessary at present.

A further concern expressed during feedback is that the rural landscape character of the Island is threatened by the extent of change of use of agricultural land to domestic curtilage. Whilst the majority of applications for change of use of agricultural land to domestic curtilage relate to sites that are not easily visible from the public domain, there are some sites that are prominent and where it is not only the contribution of the site to the openness of the landscape, but to the rural agricultural character of the Island, sometimes providing a break in an otherwise continuous stretch of domesticated ribbon development. As noted previously, alternative land management techniques such as close mowing or grazing of horses, which can impact on the visual landscape character, are outside the remit of planning policy and law.

Where such changes are within the scope of planning control, paragraph 17.3.2 of the IDP states “In seeking to facilitate a viable rural economy, the farming industry should be protected as much for the role it plays in land management as for its produce”. It is important that this continues to be weighted appropriately in decision making, with Policy GP1: Landscape Character and Open Land containing the requirements that development “respects the relevant landscape character type within which it is set” and “does not result in the unacceptable loss of any specific distinctive features that contribute to the wider landscape character of the area concerned”. The SLUP recognises important landscapes across the Island, including open common, managed fields, valleys and escarpments. In this regard, paragraph 19.2.4 of the IDP makes specific reference to the role of dairy farming in defining much of the character of the open and undeveloped land in the Island, and paragraph 19.2.5 to the historic field patterns, for example. Furthermore, paragraph 19.16.3 refers to the SLUP where it states:

"The Strategic Land Use Plan states that some people have a desire to tidy up and domesticate the landscape which will have an impact on landscape character. It further states that while this generally runs counter to the desire to preserve the local character of our landscapes, minor shifts in the management style of **small parcels of land not forming part of larger areas of open land and not visually prominent** will not fundamentally alter the character of the Island." This highlighted text gives a steer as to the type of land that is considered acceptable for a change of use to domestic curtilage.

The IDP acknowledges that a balance must be struck between public interest and personal choice. The IDP provides sufficient tools to enable a balanced approach to be taken to the consideration of changes of use of agricultural land to domestic curtilage. However, at the point of review of the IDP there may be reason to consider strengthening the wording within the policy summaries section to clarify the land management function of agriculture to align this with the main policy texts.

A final point on the matter of change of use to domestic curtilage is the loss of agricultural land in itself, which was raised several times in feedback, and whether the use of land as domestic gardens can be considered an efficient use of land. In particular, one response raised concern over the number of useable parcels of agricultural land (referred to by the respondent to be over 2.5 vergées) which are being added to the curtilage of residential properties. The C*f*E&I also noted in feedback the overwhelming majority of applications for change of use are for domestic curtilage, and that a number are for the change of use on land that previously has been farmed, which is noted to be of concern to the Committee particularly if monitoring indicates that this undermines the amount of land required for agriculture. Whilst, paragraph 19.16.3 of the IDP states that such land "will retain the ability to be used for agricultural purposes, if needed, in the future", responses highlighted that given the respective land values, it is extremely unlikely that a garden would revert to agricultural land.

The IDP responds to the strategic direction of the SLUP which is not to protect all agricultural land but to provide for other legitimate land uses in other areas, and to focus on protecting large areas of contiguous agricultural and other land. The IDP policies very much reflect that direction as they are statutorily obliged to do. For its part, the C*f*E&I has recently provided updated data on land farmed by dairy farmers and will continue to share mapping data with the Authority where appropriate. The current conclusion from data analysis is that there is still sufficient land prioritised for agriculture to meet the needs of the island.

Overall, the policies continue to work well in meeting the aspirations of homeowners, particularly with regard to curtilage, but this must continue to be balanced with both the needs and aspirations of the agricultural industry and the general requirement to ensure that development of land does not result in the unnecessary loss of open and undeveloped land and the requirement in the SLUP and the Law to preserve and promote biological diversity.

As found in 2017, given the number of applications to extend domestic curtilage it remains important to ensure that sufficient amenity space is provided or retained within residential

development to meet the reasonable needs and aspirations of householders, to avoid excessive numbers of applications for the extension of curtilage in the future.

IDP policies are intended to ensure the most effective and efficient use of land as the finite land supply is one of the Island's most precious resources. It is important that this objective is properly balanced with the need to comply with other objectives of the IDP and that the amenity of existing and future residents is considered by ensuring that sites do not become overdeveloped. The provisions of Policy GP8 and Annex 1: Amenities should continue to provide this balance but the monitoring of the location of extension of domestic curtilage applications should continue. Indicators to assess the quality of new developments are being devised and will include reference to amenity space.

2018 Action -

- At the point of review of the IDP, consideration to be given to amending the wording of Policy GP1: Landscape Character and Open Land and GP15: Creation and Extension of Curtilage within the policy summaries sections to clarify the land management function of agriculture to align this with the main policy text; and,
- At the point of review of the IDP, ensure that the wording of the policy summary of Policy GP15: Creation and Extension of Curtilage is clarified to align this with the main policy text where it relates to small parcels of land which are not visually prominent.

2017 AMR Action Update -

The 2017 AMR actions are considered still relevant and ongoing:

- Continued monitoring of planning applications outside the APA that relate to agricultural/open land and horticulture;
- Continued monitoring of extensions of domestic curtilage and the quality of new developments, noting residential amenity space (indicators currently being devised); and,
- Continued liaison with C*f*E&I at officer level regarding agricultural land use requirements and aspirations of the agricultural industry.

Dairy and Arable Farming

Agriculture plays a relatively small part in Guernsey's economy but it has a valuable land management function and the agricultural sector itself is dominated in terms of output, value and land use by the dairy industry. The estimated Gross Value Added (GVA) of the combined Agriculture, Horticulture, Fishing and Quarrying industries was approximately 0.4% in 2017 (Data and Analysis, 2018, in Facts and Figures 2018 Supplementary Data[2]).

Whilst the direct contribution to the economy is relatively small, through the land management function and the protection of the Guernsey breed, the agricultural industry also makes a significant contribution to the tourist economy, as well as to quality of life and social well-being of Islanders.

[2] See https://www.gov.gg/ff

Since current agricultural practice in Guernsey centres on the dairy industry, it is important to monitor data relating to dairy farming to ensure that IDP policies are fit for purpose in facilitating the industry, as well as enabling the land management function. It is important that the trends within the dairy industry are identified and monitored so that any future needs can be taken into consideration.

As in 2017, the C*f*E&I has provided updated information on the dairy farming industry in Guernsey. There continues to be a total of 14 dairy farms on the Island, with approximately 1,400 head of cattle in the milking herd (the numbers fluctuate, so this is an indicative figure). Annual farm output of milk is in the region of 8 million litres (8.023 million litres in 2018).

Data provided by C*f*E&I indicates a slight increase in the land managed by dairy farmers compared to 2016 and 2017 – 7,942 vergées[3] in 2018 compared to 7,770 vergées in 2017 and 7,763 vergées in 2016. This represents an increase of approximately 2.2% compared to 2017. Figure 6 shows the published figures from the Facts and Figures 2018 booklet (Source: Agriculture, Countryside and Land Management Services in Facts and Figures 2018).

Around 1,500 vergées of land is managed by farming activities other than dairy farming, such as arable and other livestock.

	Square km	Vergées	As % Island total
2006	13.79	8,414	21.7
2007	13.70	8,358	21.5
2008	13.19	8,050	20.7
2009	12.93	7,887	20.3
2010	13.39	8,171	21.1
2011	13.28	8,103	20.9
2012	13.34	8,139	21.0
2013	12.71	7,754	20.0
2014	12.61	7,691	19.8
2015	12.73	7,766	20.0
2016	12.72	7,763	20.0
2017	13.00	7,770	20.0

Figure 6: Area of land used by dairy farmers
Source: Agriculture, Countryside and Land Management Services in Facts and Figures 2018

C*f*E&I reports in feedback that it is anticipated that the number of dairy farms will reduce in the coming years due to retirements, though it is likely that some farms may seek an increase in herd size which could add to reasons for greater farm infrastructional investment. Policies OC5(A) and OC5(B) would be supportive of development related to existing farmsteads or existing agricultural holdings. Additionally, farmers on the Island are now working towards accreditation under the LEAF marque (Linking the Environment And Farming) which may create a slightly increased demand for land for dairy farming. The growing of more grain and fodder crops could also create some increase in the area of land managed by the industry.

[3] Please note that this is a revised figure provided by the C*f*E&I subsequent to providing the data in its formal response which is contained in the Appendix to the 2018 AMR.

C*f*E&I reports that change in the dairy sector will generally be slow and that policy impacts will most likely be observed in retrospect at some time in the future. However, at the current time the C*f*E&I has not seen reports of damage to the capacity of businesses to function as a result of policy changes. There were no other trends of significance in agriculture or horticulture which currently impact on the policies set out in the IDP.

In terms of Arable farming, according to the initial findings of the 2018 Habitat Survey, there has been a 39% decrease in the area of Arable Land over the last 20 years – that is, 236ha (1,438v) classified in 2018 compared to 389ha (2,373v surveyed in 1999). The preliminary findings note that there was a larger decrease between the 2010 and 2018 surveys than between the 1999 and 2010 surveys. The turnover of arable land was noted to be high, with few patches of Arable Land remaining in the same location from 1999 and 2010, and that some new patches had been gained despite the overall decrease. This is important in terms of designation as it is not a static picture.

Most Arable Land in 1999 and 2010 became Improved Grassland, Arable Short-Term Ley or remained as Arable Land, due to the rotation of crops, grazing and land left fallow. Most Arable Land in 2018 originated from the same as above, again due to farming rotation which is not development that requires planning permission. From 1999-2018, 6.6ha of Semi-Improved Grassland was lost to Arable Land which has implications for biodiversity, with agricultural land generally supporting low levels of biodiversity compared to other habitat types.

Also of interest, the preliminary findings of the 2018 Habitat survey found that there had been a 15% increase in the area of Arable Short-Term Ley since 2010 (this category was not used in 1999), from 556ha (3,390v) in 2010 to 640ha (3,905v) in 2018. This has a low biodiversity of plant species but is important in allowing the land to rest between agricultural uses. It is estimated that since 1999, 11ha of Semi-Improved Grassland has been lost to Arable Short-Term Ley. Others changes were, as in the case of Arable Land above, a result of farming rotation.

Further review of the Habitat Survey data will enable spatial analysis of Arable Land and Arable Short-Term Ley in order to identify the proportion of these types of land that fall within and outside of the APA.

The C*f*E&I has also reported on the progress of other workstreams relating to farming. The Biodiversity Project Team, for example, has met with the farming community to discuss the planting of pollinator friendly hedging on farms, with work also ongoing in relation to the review and finalising of a Farm Biodiversity Action Plans report.

In summary, this year's data shows no change in the number of dairy farms but an increase of approximately 2.2% in the amount of land in dairy farm use. There could be further scope in the future for an increased land area to be used for growing grain and fodder crops, with herd numbers likely to remain stable despite a predicted decline in the number of dairy farms due to retirement. There is work to increase the biodiversity of farmland as part of the overall Biodiversity Strategy, which the IDP and all Committees must have regard to.

The IDP recognises that farmers operate across a scattered pattern of generally small fields which can constrain viability but which typifies the traditional, small scale and intricate landscape. It is therefore important to ensure that the right land is prioritised for agriculture. Land used by dairy farmers relative to the APA therefore needs to be kept under review in the event that changes are needed to the extent of the APA designation. The final section of this report 'Changes in factors influencing APA identification' discusses this issue further.

2017 AMR Action Update -

- The monitoring of the changing needs of the dairy industry (including possible requirements to grow more grain and fodder crops) is ongoing;
- The monitoring of land farmed by dairy farmers relative to APA designation, including any losses of tenanted agricultural land outside the APA is ongoing; and,
- Further analysis of mapping data showing dairy farmed land – this will continue to be undertaken annually on receipt of up-to-date information.

INDICATOR – Number of dairy farms		
Plan Objective		Plan Objective 2: Manage the built and natural environment. Plan Objective 3: Support a thriving economy.
Target		None.
Outcome	2018	There has been no change in the number of dairy farms.
	2017	There has been no change in the number of dairy farms
Target met?		n/a
Comments (including any risks to delivery)		Possible increase in land for growing grain and fodder crops in connection with the dairy industry needs may be required in the future. Increase of 2.2% in the area of land used by dairy farmers in 2018 compared to 2017.
Action		Continued monitoring of changing needs of the dairy industry (including possible requirements to grow more grain and fodder crops). Continued monitoring of land farmed by dairy farmers relative to APA designation, including any losses of tenanted agricultural land outside the APA. Continued analysis of mapping data showing dairy farmed land.

Operational horticultural sites

IDP policies are intended to support existing horticultural businesses where they make a material contribution to the horticultural industry and are likely to continue to do so for the foreseeable future. Therefore proposals for development supporting existing horticultural businesses will generally be supported, and the establishment of wholly new horticultural holdings will be resisted in order to encourage best use to be made of existing holdings. Monitoring change in the number of operational horticultural sites along with other relevant data will allow monitoring of the industry and the responsiveness of IDP policies.

There was one planning application relating to an existing horticultural operation in the APA during 2018, which was to clad a section of the glasshouse and install new doors. Outside the APA, there was one planning application which was to raise the height of a glasshouse to improve its suitability for commercial operations. Both of these applications were approved, with policy OC6: Horticulture Outside of the Centres providing support.

In 2017, the Committee *for* Economic Development (C*f*ED) confirmed that both the Committee *for* Health & Social Care (C*f*H&SC) and the C*f*ED had received a number of enquiries from businesses interested in producing medicinal cannabinoid (CBD) products, including the growth of cannabis under licence, which may have a future impact on the level of demand for and specifications of horticultural premises. Since this time, the C*f*ED has continued to receive many enquiries. As yet it is unknown what impact this will have on the stock of horticultural sites and how this may relate to Policy OC6 concerning works to existing glasshouse sites.

The C*f*ED recognises the economic potential of processing sites for the conversion of cannabis crops into CBD and hopes that the IDP will allow for sufficient flexibility when considering applications for these to be built. During 2018 this was not tested, however there have since then been relevant applications, which will be reported in the 2019 AMR, and these were supported by IDP policies.

2017 AMR Action Update - The 2017 AMR actions are ongoing. These actions were as follows:

- The nature of applications relating to horticultural proposals continue to be monitored; and,
- That the Authority continues to liaise at officer level with Committee *for* Economic Development over horticultural issues as appropriate, but particularly in connection with the potential establishment of CBD businesses as outlined above.

INDICATOR – Number of operational horticultural sites		
Plan Objective		Plan Objective 2: Manage the built and natural environment. Plan Objective 3: Support a thriving economy.
Target		None.
Outcome	2018	No significant changes.
	2017	No significant changes
Target met?		n/a
Comments (including any risks to delivery)		Possible future changes in the horticultural industry in connection with CBD businesses.
Action		The nature of applications relating to horticultural proposals continue to be monitored; and, The Authority continues to liaise with C*f*ED at officer level over horticultural issues as appropriate, but particularly in connection with the potential establishment of CBD businesses as outlined above.

Changes in factors influencing APA identification

As set out in the Agriculture Priority Area report (October 2014), the APA was identified through a process which involved:

A. Identification and mapping of land currently in agricultural use, removing any land within the Main Centres, Local Centres and the airport to allow for opportunities for development and, in the case of the airport, operational reasons;
B. Mapping of the Island's Best and Most Versatile Land (BMV);
C. Identification of adjoining redundant glasshouse sites and other suitable areas well related to established agricultural operations;
D. Removal of land to be designated as a Site of Special Significance;
E. Assessment and mapping of A, B, C and D together to identify large tracts of contiguous agricultural land, and removal of isolated areas through testing of options for a minimum size threshold; and,
F. Broadly drawing boundaries around the remaining large tracts of land.

Significant changes to the evidence base which informed the process of identification of the APA could present reason for reviewing the APA boundaries.

Action - At the time of a full review of the IDP it is intended to combine 5 years information on land in active dairy farm use to inform an updated APA. This is in order to ensure that fallow land is captured as the information changes year upon year. This will lead to a more robust baseline position. However there are no significant findings at this point that suggest a review should be carried out in the immediate future.

Further work was carried out by the Planning Service in 2017 in connection with redundant glasshouse sites to produce an updated accurate baseline. This information is undergoing analysis to estimate the approximate number of redundant glasshouse sites that fall within or adjacent to the APA. However it must be noted that this will only produce an approximate estimate as an assessment of the status of these sites would be carried out through the formal planning application process.

A final factor relating to the APA is the minimum size threshold which defines whether tracts of land will, or will not, be included within the APA (in accordance with the SLUP direction to protect the large areas of contiguous agricultural and other land). The SLUP and the IDP recognise that farmers operate across a scattered pattern of generally small fields which can constrain viability but which typifies the traditional, small scale and intricate landscape. Therefore not all land that is actively farmed falls within the APA. The continued use of this land for agriculture is generally supported, although agricultural use is not prioritised, in accordance with the SLUP direction to balance the requirement for such land with the requirement for other legitimate uses.

At the time of writing, the Habitat Survey 2018 has been completed but the report not yet been published. This information will also be analysed in more detail in so far as it relates to agricultural land use on the Island.

There is nothing to suggest, at this time, any significant changes in the baseline evidence for the APA which would require a review of its boundaries. However, if further analysis of the

updated information identifies significant changes in the APA baseline evidence, then there may be reason to consider amendments to the APA which would need to be done through formal review of the IDP.

Action - To continue to gather accurate data on factors affecting the APA designation.

2017 AMR Action Update - in 2017, it was considered that further analysis of the updated information on land farmed by dairy farmers and on the updated redundant glasshouse sites baseline relative to the APA designations should be carried out. This has been achieved and the findings reported above.

INDICATOR – Extent of factors influencing the APA designation		
Plan Objective		Plan Objective 2: Manage the built and natural environment.
Target		None.
Outcome	2018	No changes to BMV information or to SSS. Updated information on land farmed by dairy farmers indicates that approximately 88% of land farmed by dairy farmers in 2017 fell within the APA. Updated data from 2018 is not yet available for analysis.
	2017	No changes to BMV information or to SSS. Updated information on land farmed by dairy farmers needs further analysis but appears to be largely consistent with the designated APA.
Target met?		n/a
Comments (including any risks to delivery)		No updated information on BMV land available at present. Habitats Survey data 2018 not yet available for analysis.
Action		To continue to gather accurate data on factors affecting the APA designation.

Summary

From the evidence gathered, the APA designation appears to be working as intended by supporting proposals related to the agricultural and horticultural industries, including making provision for diversification of those industries. This is balanced with allowing other legitimate uses, as required by the SLUP. A study of five years' worth of data and an analysis of the Habitat Data set will allow more detailed understanding of agricultural land patterns and farming. Changes of use away from agricultural land will continue to be monitored so ensure that the policies are providing the correct balance.

Outside of the Centres the planning applications for change of use were predominantly for change to domestic curtilage, supported by the provisions of both Policy OC5(A) and Policy OC5(B) which allow for such a change as a legitimate use under certain circumstances. Evidence suggests that there remains sufficient agricultural/horticultural land to meet the current and future needs of the agricultural industries, however this is still worth monitoring closely to ensure both sufficient land, and land in the right place, is being provided. There

may be reason to clarify the wording of policies to ensure that the objectives of the SLUP in relation to protecting the character of the landscape are emphasised.

Summary of monitoring requirements

- Continue to monitor approvals and refusals within the APA to identify trends and ensure that sufficient land remains available for agricultural use;
- Continued monitoring of planning applications outside the APA that relate to agricultural/open land and horticulture;
- Continued monitoring of extensions of domestic curtilage and the quality of new developments, noting residential amenity space (indicators currently being devised);
- Continued monitoring of the changing needs of the dairy industry (including possible requirements to grow more grain and fodder crops);
- Continued monitoring of land farmed by dairy farmers relative to APA designation, including any losses of tenanted agricultural land outside the APA;
- Continued monitoring of the nature of applications relating to horticultural proposals;
- Continue to gather accurate data on factors affecting the APA designation;
- Continued analysis of mapping data showing dairy farmed land; and
- Analysis of the 2018 Habitat Survey data to provide comprehensive data on land use, including that within the APA, and including agricultural, horticultural and undeveloped land.

Summary of action required

- Consider review of wording of Policy GP15: Creation and Extension of Curtilage in relation to the issues raised by the Appeals Panel when the IDP is reviewed;
- At the point of review of the IDP, consideration to be given to amending the wording of Policy GP1: Landscape Character and Open Land and GP15: Creation and Extension of Curtilage within the policy summaries section, to clarify the land management function of agriculture, to align this with the main policy texts;
- At the point of review of the IDP, ensure that the wording of the policy summary of Policy GP15: Creation and Extension of Curtilage is clarified to align this with the main policy text where it relates to small parcels of land which are not visually prominent;
- At the time of a full review of the IDP it is intended to combine 5 years information on land in active dairy farm use to inform an updated APA;
- Publication of Supplementary Planning Guidance on applying for planning permission in the Agriculture Priority Area in order to assist applicants and agents;
- Continued liaison with the Committee *for the* Environment & Infrastructure at officer level regarding agricultural land use requirements and aspirations of the agricultural industry; and,
- That the Development & Planning Authority continues to liaise with the Committee *for* Economic Development at officer level over horticultural issues as appropriate, but particularly in connection with the potential establishment of CBD businesses as outlined above.

Redundant Glasshouse Sites

Introduction

Commercial horticultural operations, which were formerly part of the basis of Guernsey's economy, have greatly reduced in number and are consolidating on fewer, larger holdings, which has had the inevitable consequence of an increasing number of sites across the island where the glasshouses and ancillary structures are no longer required or capable of being used and which are in varying states of repair.

The Strategic Land Use Plan (SLUP) requires the Island Development Plan (IDP) to introduce policies to facilitate the clearance of redundant glasshouse sites (Policy LP13). The SLUP encourages the removal of redundant glasshouses and ancillary structures and promotes the return of such land to agricultural use or open space provision in the first instance. Whilst the SLUP recognises that there are only a limited number of realistic options for glasshouse clearance, one of these is by offering some uplift in land value through development to assist with the cost of clearance. The SLUP contains a number of policies that are relevant to the possible future uses of redundant glasshouse sites including open countryside (SLP28), landscape (SLP27), biodiversity (SLP30), curtilage (LP13), camping (SLP7), outdoor recreation or leisure (SLP10), small-scale business development (SLP4), renewable energy (LP2) and conversion of redundant ancillary structures to a range of potential new uses.

Under the terms of the Planning Law, redundant glasshouse sites and any ancillary structures are treated as agricultural land and so, on the clearance of the structures, the land is expected to revert to agricultural use. However, IDP Policy OC7: Redundant Glasshouse Sites gives flexibility for certain development proposals on some redundant glasshouse sites, in specific circumstances, where they are consistent with the policies of the IDP.

The cost of clearance of redundant glasshouse sites versus their value as agricultural or open land can act as a barrier to the removal of structures. Therefore, the rationale behind Policy OC7 is to help secure the removal of redundant glasshouses and ancillary structures to enhance the landscape. It does this through supporting specific uses, generally not capable of being located in a Centre or not supported in a Centre providing that the proposal includes demolition and removal from the site of all glasshouses and ancillary structures which are not capable of being used in association with any new use in accordance with the IDP policies and by requiring a development to provide a positive contribution to the visual quality of the environment. There needs to be a clear indication that the glasshouse(s) is no longer required or capable of being used for their authorised purpose to demonstrate redundancy and for Policy OC7 to apply.

Redundant glasshouse sites baseline

In 2017 an up to date baseline of redundant glasshouse sites was established, based on 2016 data, to be updated every three years to coincide with the aerial photographs that are supplied by Digimap. The methodology for this process is outlined in the Redundant Glasshouse Thematic Report from the 2017 AMR. The next update will be following the

2019 aerial photographs. As such there is no updated baseline to report against this year and the findings are presented in relation to the 2016 baseline. There remains an action to maintain and regularly update this information.

The next update of this baseline, to be carried out in 2020 based on 2019 data, will give a more comprehensive overview of change on redundant glasshouse sites, including whether or not there has been more clearance of glass as a result of planning approvals or if such structures are being removed outside the planning system (removal of glass in itself does not require planning permission). This will give an indication of the effectiveness of IDP policies in encouraging the removal of glass.

The purpose of this report is to provide an audit of planning applications relating to redundant glasshouse sites. This considers the types of proposals, number of refusals and approvals, and the amount of glass cleared as a result of those planning approvals.

Whilst the focus of this report is on redundant glasshouse sites, it is also acknowledged that, as described in the feedback from the Committee *for* Economic Development (C*f*ED), there have been continuing enquiries relating to the production of medicinal cannabinoid (CBD) products including the growing of cannabis under licence which may have a future impact on the level of demand for, and specifications of, horticultural premises. As yet the implications for the stock of horticultural sites and on the planning policy framework are unknown. At the current time, the States of Guernsey Economic Development Strategy 2018[1] makes no reference to the horticultural or agricultural industries, and the States of Guernsey 'Facts and Figures 2018' shows that the number of people employed in these industries has remained broadly similar since 2015[2], suggesting that there have been no significant recent changes within these industries. Horticulture is discussed further in the Agriculture and Horticulture report.

2017 AMR Action Update – the 2017 AMR included an action to maintain and regularly update and refine the redundant glasshouse sites baseline. This action is carried forward.

Defining Redundant Glasshouse Sites

In 2018, a Planning Tribunal heard an appeal against the refusal of planning permission in 2017 for a proposal to erect 4 industrial units for storage/distribution and to create new access and parking at Dolphin Vinery, La Blanche Carriere, Vale. The appeal site adjoins Le Grand Pre nature reserve. The appeal was dismissed on the grounds that the appeal site would contribute positively to an adjacent wider area of open land. Having reached this conclusion, the appeal had to be dismissed. However before reaching this conclusion, the tribunal had to determine whether the appeal site was a redundant glasshouse site within the definition provided in the IDP.

In reaching its conclusion, the Tribunal was very aware that the objective of improving the appearance of the countryside through the removal of unsightly, neglected glasshouses would not be achieved on the appeal site; the glasshouses were cleared many years ago and

[1] https://www.gov.gg/article/163886/States-Meeting-on-27-June-2018-Billet-dtat-XVIII

[2] Facts & Figures 2018 Supplementary Data

the remnants of the structures which remained on the site were not readily visible due to their positions at surface level and below ground, and were being screened by overgrown vegetation.

The IDP defines a "Redundant Glasshouse Site" as

> "*a glasshouse or glasshouses, together with ancillary structures and land where the glass and ancillary structures are no longer required or capable of being used for their authorised purpose. Often the condition of such structures will deteriorate over time for lack of use and management to leave only partial remnants of structures*."

IDP Policy OC7 flows from, and reflects, the SLUP. It sets out the presumption that when a horticultural use ceases, the site will be cleared of glasshouses and ancillary structures and returned to agricultural use. Where agriculture is not a viable option and where the site does not contribute positively to a wider area of open land, the policy then offers limited support for other specified forms of development provided the proposals would secure the demolition and removal from the site of the redundant glasshouses and ancillary structures, or remnants thereof.

The intention of this approach is clear. In supporting limited development on redundant glasshouse sites, it aims to address the legacy of dilapidated and deteriorating glasshouses throughout the Island and primarily the negative visual impact they have by securing their removal and enhancing the Island's countryside with appropriate alternative, mainly open space-type uses.

However, the IDP definition of a redundant glasshouse site makes no explicit distinction between structures and remnants of such structures which are visible above ground (and therefore have a visual impact) and those structural elements of a disused glasshouse with little or no visual presence in the landscape because they are at surface level or below ground.

In reaching its conclusion on this matter, the Tribunal was mindful that Dolphin Vinery was not an isolated case and highlighted a need to further define a "redundant glasshouse site" in a way which achieves both the SLUP's intentions and the aim underpinning IDP Policy OC7 to secure landscape enhancements when permitting the development of such sites for other appropriate uses.

As a result, the Authority has produced Supplementary Planning Guidance which was adopted in December 2018 to clarify the definition of a redundant glasshouse site as one where the above ground glasshouse super structure remains.

Redundant glasshouse sites planning permissions

<u>New uses for redundant glasshouse sites (Change of use)</u>

IDP Policy OC7 allows for a range of alternative uses for redundant glasshouse sites. Figure 1 shows the number of planning application approvals and refusals from 1st January to 31st December 2018 for the change of use of redundant glasshouse sites.

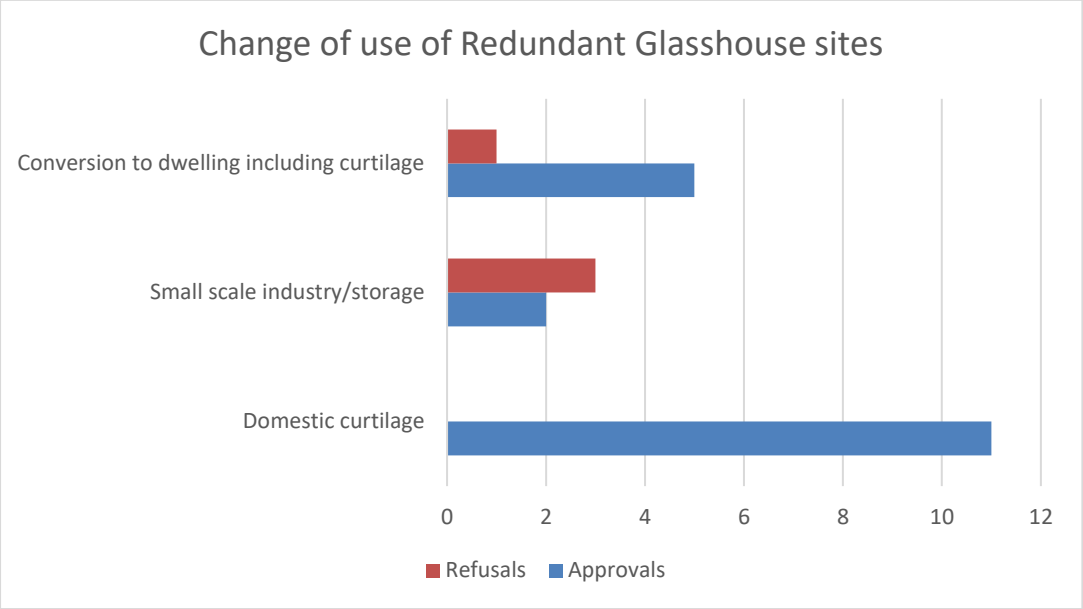


Figure 1: New uses of redundant glasshouse sites

In total, 22 planning applications were determined which included change of use of redundant glasshouse sites to other uses.

11 of these 22 applications were for the change of use of the land to domestic curtilage, and of these, 3 proposals involved the removal of glass, the others being granted approval to incorporate the glasshouses into the domestic curtilage. All of the 11 applications were approved, and where the removal of glass was involved a condition was imposed to ensure compliance and/or their removal was indicated on the approved plans. The total area of glass removed as a result of these three approvals is approximately 7420m^2.

There were five approvals to convert redundant horticultural buildings to dwellings, and in each of these cases the removal of glass was either included as a condition of the approval, or indicated as part of the approved plans. In total, these approvals, if implemented, will involve the removal of approximately 15445.5m^2 of glass. One application for conversion was refused planning permission because it was considered contrary to policy GP16(A): Conversion of Redundant Buildings and OC1: Housing Outside of the Centres as the building was not capable of conversion without substantial extensions, extensive alteration or rebuilding and as such was considered tantamount to the erection of a new dwelling Outside of the Centres. Furthermore, the application failed to demonstrate compliance with policy OC5(A): Agriculture Outside of the Centres – within Agriculture Priority Areas where a proposed extension of curtilage in the Agriculture Priority Area had not been satisfactorily justified, potentially resulting in the unacceptable loss of agricultural land.

In terms of the applications for small scale industry or storage and distribution, two approvals were granted, one of which involved the reuse of a large span of glass (approximately 7637m^2) for the purposes of drying and processing seaweed for use in fertilisers and other products. The second approval related to an application for open storage yards, for which there is a recognised difficulty in finding suitable sites as identified

by the Strategic Land Use Plan. The application was approved and a condition imposed to secure removal of approximately 1780m^2 of redundant glasshouses and ancillary structures.

There were three refusals of planning permission for changes of use to small scale industry. One application was refused due to the unacceptable intensification of traffic accessing the site in conflict with policies OC3: Offices, Industry and Storage and Distribution, OC7: Redundant Glasshouse Sites Outside of the Centres and IP9: Highway Safety, Accessibility and Capacity; another refusal was as a result of the site's location adjacent to the Agriculture Priority Area, where the applicant had failed to demonstrate that the site could not contribute to the commercial agricultural use of the APA (conflict with policies OC7 and OC3); the third of the refusals was as a result of conflict with Policy OC7(b), as the site, if cleared of glasshouses and ancillary structures, would make a positive contribution to open land.

Not included in the figures above (as it relates to an existing (albeit temporary) use), an additional approval related to the making permanent of a previous temporary permission on a former glasshouse site for a campsite. This approval did not involve the removal or addition of any glass, the existing glasshouse being incorporated into the extent of the campsite and being used for related activities.

In summary, of the 22 proposals, 18 were approved and 4 of these approvals included conditions to secure the removal of glass. An additional 4 approvals included the removal of glass as part of the approved plans.

Figure 2 shows the location of the applications for change of use relating to redundant glasshouse sites.

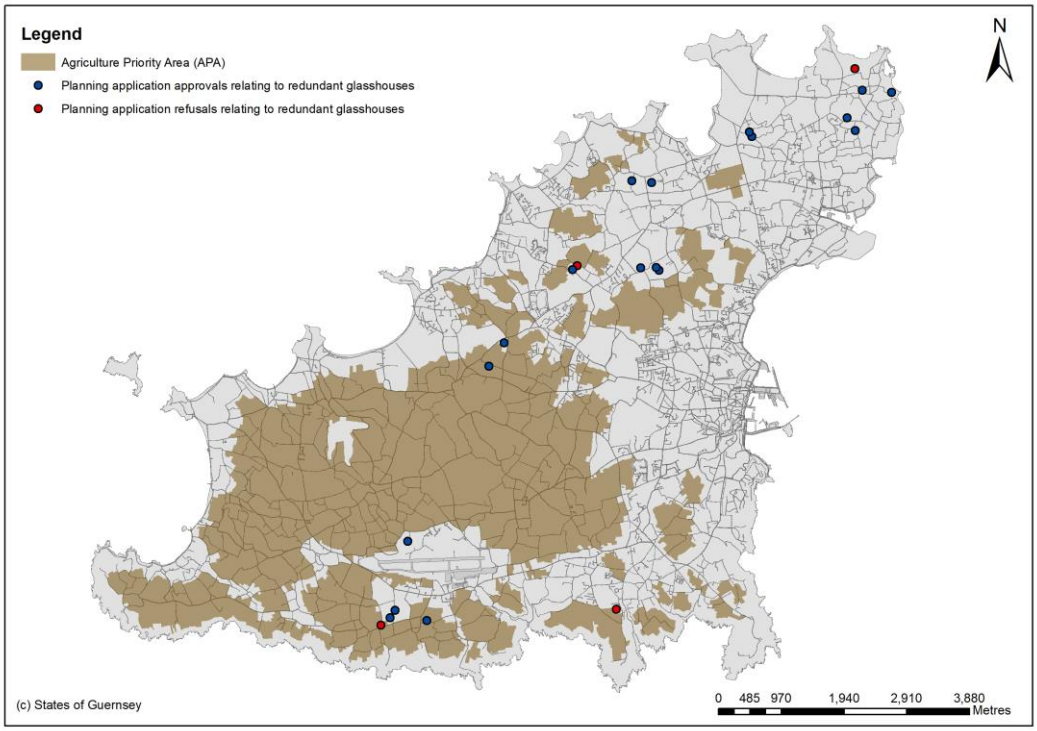


Figure 2: Location of planning applications for change of use relating to redundant glasshouse sites, 2018.

In total therefore, there were 18 approvals granted for change of use from redundant glasshouse sites to other uses, plus the making permanent of a previous temporary permission for a campsite. 4 applications were refused. If implemented, the approvals will result in the removal of a total of approximately 22865.5m^2 of redundant glass (2.28 hectares). This is similar to the figure in 2017, where the removal of approximately 2 hectares of redundant glass had been secured via planning approvals (approximately 2.8% of the total 80.6 hectares identified in the 2016 baseline exercise).

To date no planning applications have been received relating to renewable energy, outdoor formal recreation or informal leisure and recreation on redundant glasshouse sites. However in response to consultation as part of the AMR process, the Committee *for the* Environment & Infrastructure (C*f*E&I) described progress with the Energy Policy and the resulting impact on energy infrastructure, including both domestic and utility scale renewables, so as previously, this is an area for continued liaison with C*f*E&I. The C*f*ED also continue to be involved with the C*f*E&I on this matter.

Also in relation to renewables, the States of Guernsey Economic Development Strategy refers to the economic potential of renewable energy, both in terms of generation and storage. However feedback from the States' Trading Supervisory Board, in agreement with the response from Guernsey Electricity, is that the IDP policies could be more supportive in order to enable the Island to meet its energy policy aspirations and drew attention to the criteria of Policy IP1: Renewable Energy Infrastructure. Policy OC7: Redundant Glasshouse Sites makes provision for renewable energy installations on redundant glasshouse sites subject to certain criteria, however the Authority has yet to receive any such applications on redundant glasshouse sites so this aspect of IDP policy is yet to be tested.

Feedback for the AMR from La Société Guernesiaise refers to the biodiversity of redundant glasshouse sites, explaining that some sites which have been derelict for long periods of time have become relatively rich in certain types of wildlife, for example invertebrates and nesting birds. La Société Guernesiaise note that "As with Open Land, the IDP does not include consideration of biodiversity within Policy OC7 and as such, the development of these sites would lead to a loss of wildlife. La Société would recommend that applications relating to derelict glass include an assessment of the natural environment and where possible, include appropriate mitigation and offsetting measures as planning conditions."

Paragraph 17.5.13 of the IDP acknowledges that "Some redundant glasshouse sites provide valuable natural habitats for wildlife and support biodiversity." The text goes on to refer to sites within designated Sites of Special Significance (SSS – 9 sites covering approximately 839 hectares) or Areas of Biodiversity Importance (ABI – 84 sites, covering 196 hectares) when considering impacts related to natural habitats.

Taking on board the comments from La Société Guernesiaise, without an assessment of the biodiversity of the site in question then determining the extent of the impact on any natural habitat is difficult. Given that glasshouse sites are expected to revert to agricultural land on the clearance of glass and other structures, and that planning permission would not be required for this unless falling within a SSS as no change of use has occurred there would be

no mechanism under planning law to require an assessment of the biodiversity of the site (except in relation to the SSS). This reflects the approach of the IDP to ensure that the most important sites are protected by designation (Sites of Special Significance and Areas of Biodiversity Importance).

Where a redundant glasshouse site lies within or adjacent to an Agriculture Priority Area, criterion (a) of Policy OC7 applies which states that, in order for support to be given to develop the site: "the site cannot positively contribute to the commercial agricultural use of an identified APA or cannot practically be used for commercial agriculture without adverse environmental impacts or where proposals are for renewable energy infrastructure and the design would allow agricultural activity to continue on the site."

Therefore on these sites, the environmental impact of returning to agricultural use will be taken into account and it follows that the change to an alternative use would therefore have to have less of an environmental impact. This is not exclusively limited to an impact on biodiversity, but nevertheless that would be considered an environmental impact.

Outside the APA and where it is established that a site "would not contribute to a wider area of open land" in accordance with criterion OC7(b), the Policy refers to appropriate alternative uses for the site and the relevant policies of the IDP which relate to those uses. OC7 then lists several general criteria that must be satisfied in all cases, including the provision of a soft landscaping scheme "which will make a positive contribution to the visual quality of the environment and which will sufficiently screen the activities on the site and mitigate impacts". This includes the mitigation of impacts on natural habitats and biodiversity.

According to the initial findings of the 2018 Habitat Survey of Guernsey, Herm and Jethou which was conducted in compliance with the States of Guernsey Biodiversity Strategy and which is expected to be published in July 2019, there have been several significant changes since the 2010 Habitat Survey was carried out. Several of the changes reported are as a result of a lack of balanced management, for example where areas have been abandoned or intensively managed. This has given rise to the extinction on the Island of unimproved grassland, and an 81% reduction in semi-improved grassland, for example. The Survey recommends more sensitive management of land with biodiversity-friendly strategies implemented to prevent further loss of biodiversity on Guernsey and restore lost areas of biodiverse habitats.

Whilst a core purpose of Planning Law is to preserve and promote biological diversity, some of these issues are outside the control of the Planning system. For example planning permission is not always required for alternative land management techniques, for example the planting of hedges, trees and flowers or the mowing of grass does not generally involve works constituting development. However, should analysis of evidence (including the 2018 Habitats Survey data) indicate that there are specific redundant glasshouse sites (or types of sites) that are worthy of protection from a habitats/biodiversity perspective, then there may be scope to afford a higher level of protection to such sites through a Subject Plan or other policy mechanism.

Action – Liaison at staff level with the Committee *for the* Environment & Infrastructure regarding the identification of redundant glasshouse sites with particular biodiversity interest.

2017 AMR Action Update - In the 2017 AMR it was noted that continued liaison at officer level between the Authority and the Committee *for the* Environment & Infrastructure in relation to the development of the Energy Policy and any impacts arising would be necessary. This continues to be ongoing as the Energy Policy develops. No significant issues have been identified in relation to planning policies for renewable energy and there is no evidence that planning policies are acting to block any strategic renewable energy development.

INDICATOR – Permissions for change of use of redundant glasshouse sites		
Plan Objective		Plan Objective 1: Make the most effective and efficient use of land and natural resources. Plan Objective 2: Manage the built and natural environment.
Target		Secure the clearance of redundant glasshouse sites through the grant of planning permission to appropriate uses.
Outcome	2018	18 Redundant glasshouse sites have been given planning permission for change of use. An additional permission made permanent a previous temporary use as a campsite. 4 of the approvals included conditions to secure the removal of glass, whilst an additional 4 approvals included the removal of glass as part of the approved plans.
	2017	9 Redundant glasshouse sites have been given planning permission for change of use. In all cases the permission includes a condition to clear the glass and ancillary structures, unless the approval includes permission to reuse the ancillary structures.
Target met?		Yes.
Comments (including any risks to delivery)		n/a
Action		2017 AMR Action Update – the 2017 AMR included an action to continue to monitor planning permissions for change of use of redundant glasshouse sites. This action is carried forward. The Development & Planning Authority to continue to liaise with the Committee *for the* Environment & Infrastructure at an officer level in relation to the development of the Energy Policy and to monitor any likely impacts this emerging policy may have on the number of planning applications relating to change of use of redundant glasshouse sites for renewable energy (Policy IP1).

	Liaison at staff level with the Committee *for the* Environment & Infrastructure regarding the identification of redundant glasshouse sites with particular biodiversity interest.

Clearance of redundant glasshouse sites to implement planning permissions

Criterion iv of Policy OC7 requires proposals to include the demolition and removal from the site of all glasshouses and ancillary structures which are not capable of being used in accordance with the relevant policies of the IDP. In some cases it may be possible to re-purpose existing structures as part of the new use and any ancillary buildings which are structurally sound may also have potential to be converted to a new use in accordance with Policy GP16(A). Glasshouses are not considered permanent structures for the purposes of this policy.

As described above, if implemented, the approvals from 2018 will result in the removal of a total of approximately 22865.5m^2 of redundant glass (2.28 hectares). This is similar to the figure in 2017, where the removal of approximately 2 hectares of redundant glass had been secured via planning approvals. Therefore, over the two years of monitoring the combined total of redundant glass which has the potential to be removed as a result of receiving planning approval is approximately 5% of the total of 80.6 hectares of redundant glass.

2017 AMR Action Update - the 2017 AMR include an action to monitor the area of glass to be cleared to implement planning permissions. This action is carried forward as: To continue to monitor the clearance of redundant glasshouse sites following planning permission to determine which sites have been cleared from the baseline as a result of planning permission being granted.

2017 AMR Action Update - the 2017 AMR proposed that the Development & Planning Authority continue to liaise with the Committee *for* Environment & Infrastructure at an officer and political level with regards to information on the small number of commercial glasshouse operations and the level of resources allocated to the horticultural census. This was progressed through discussions with Agriculture, Countryside and Land Management Services. Information will continue to be shared where appropriate and relevant.

The States has recognised, through adoption of the IDP, that land planning alone cannot provide a comprehensive solution to the clearance of such sites. Policy OC7 has been put in place to provide some opportunity to incentivise the removal of redundant glasshouses. However, it is recognised that this is limited and that a comprehensive solution across the States and with land owners is required. It will be important to continue monitoring to what extent glass is cleared as a result of planning policy and permissions to ensure the policies in the IDP continue to be flexible enough when determining redundancy of glasshouse sites in order to manage the decline of the horticultural industry.

INDICATOR – clearance of redundant glasshouse sites to implement planning permissions given		
Plan Objective		Plan Objective 1: Make the most effective and efficient use of land and natural resources. Plan Objective 2: Manage the built and natural environment.
Target		Clearance of redundant glasshouse sites.
Outcome	2018	To be monitored.
	2017	To be monitored.
Target met?		n/a
Comments (including any risks to delivery)		n/a
Action		To continue to monitor the clearance of redundant glasshouse sites following planning permission to determine which sites have been cleared from the baseline as a result of planning permission being granted. Continue to liaise with the Committee *for* Environment & Infrastructure at an officer and political level with regards to information on the small number of commercial glasshouse operations and the level of resources allocated to the horticultural census.

Location of the sites within or adjacent to the Agriculture Priority Area

Where a redundant glasshouse site is located within or adjacent to an Agriculture Priority Area (APA) it will be expected to be used for other agricultural purposes, once cleared, unless it is demonstrated that it cannot positively contribute to commercial agricultural use or cannot practically be used for commercial agriculture without unacceptable adverse environmental impacts. It will be important to monitor what proportion of redundant glasshouse sites are returned to agricultural use where these fall within or adjacent to the APA to determine how this contributes to the larger swathes of agricultural land.

In 2018, there were 4 applications for the change of use of redundant glasshouse sites within the APA, 3 of which were approved, and three applications on sites adjacent to the APA, 1 of which was approved.

Of the applications within the APA, the refusal related to a change of use of land to domestic curtilage and the conversion of a redundant building. It was found that the building was not capable of conversion (contrary to Policy GP16(A)) and that the change of use of agricultural land had not been satisfactorily justified so would result in the unacceptable loss of agricultural land (contrary to policies GP15, OC5(A) and OC7).

Of the sites adjacent to the APA, 1 of the 2 refusals related to a conflict with OC7 and OC3 where the applicant had failed to demonstrate that the land could not contribute to the commercial agricultural operation of the APA and the land had the potential to contribute to a wider area of open land. The second refusal was as a result of the intensification of

traffic movements rather than the potential contribution of the site to commercial agriculture.

The approvals were all found to comply with the IDP policies including OC5(A): Agriculture Outside of the Centres – within the Agriculture Priority Area, OC7: Redundant Glasshouse Sites Outside of the Centres, GP1: Landscape Character and Open Land and GP15: Creation and Extension of Curtilage.

One of the approvals within the APA had previously been refused but additional information was submitted with the application to demonstrate compliance with GP15(c) where it must be demonstrated that the land cannot positively contribute to the commercial agricultural use of an Agriculture Priority Area or cannot practically be used for commercial agriculture within an Agriculture Priority Area without unacceptable adverse environmental impacts. A second application in the APA was also approved on the basis that the applicant had demonstrated that the land was no longer required for agricultural purposes (OC5(A): Agriculture Outside of the Centres – within the Agriculture Priority Area. A third approval in the APA was the permanent permission for a campsite which had previously been granted a temporary permission.

Planning policies have prevented the change of use away from agricultural land in cases where the applicants have failed to demonstrate compliance with policies which intend to give priority to agricultural use.

2017 AMR Action Update - the 2017 AMR included an action to monitor planning applications relating to redundant glasshouse sites within and adjacent to the APA. This action has been carried forward. An additional 2017 action was for the continued monitoring of cleared glasshouse sites to establish if any such sites are contributing to agricultural land. This action is encompassed within the review of the redundant glasshouse sites baseline, to take place every 3 years coinciding with the availability of aerial photographs of the island.

INDICATOR – Change in the number of redundant glasshouse sites within and adjacent to the APA		
Plan Objective		Plan Objective 1: Make the most effective and efficient use of land and natural resources. Plan Objective 2: Manage the built and natural environment. Plan objective 3: Support a thriving economy.
Target		All redundant glasshouse sites within and adjacent to the APA revert to agricultural land.
Outcome	2018	To be monitored.
	2017	To be monitored.
Target met?		1 change of use away from agriculture in 2017. 4 changes of use away from agriculture in 2018 (including the making permanent of the previously temporary permission for a campsite).

Comments (including any risks to delivery)	n/a
Action	Continued monitoring of planning applications relating to redundant glasshouse sites within and adjacent to the APA.

Summary

As noted, the Strategic Land Use Plan (SLUP) requires the IDP policies to facilitate the removal of redundant glasshouses and promotes the return of such land to open agricultural use in the first instance.

Whilst land use planning is only part of the solution of the removal of redundant glasshouses, over the course of 2018, 22 applications for the change of use of redundant glasshouse sites were determined, with four refusals and 18 approvals. Through these permissions, if implemented, the clearance of approximately 2.28 hectares of redundant glass has been secured from 1st January to 31st December 2018.

The policies in the IDP place emphasis on designated Sites of Special Significance and Areas of Biodiversity Importance, as well as noting the impact on natural habitats of changes of use of redundant glasshouse sites. Coupled with the purposes of the Law this provides tools to ensure that the biodiversity of sites is considered in decision-making. Notwithstanding, liaison at staff level with the Committee *for the* Environment & Infrastructure regarding the identification of redundant glasshouse sites with particular biodiversity interest is recommended.

Overall, IDP Policy OC7 has been effective in securing the removal of some redundant glass and restoration of the landscape as required by the SLUP and the policy remains relevant. There have also been applications that have failed to demonstrate compliance with policy and the balance has been to refuse planning permission, on some cases because of the potential contribution of the site to the commercial agriculture of the APA.

Summary of monitoring requirements

- To maintain and regularly update and refine the redundant glasshouse baseline;
- Continued monitoring of planning permissions for change of use of redundant glasshouse sites;
- To continue to monitor the clearance of redundant glasshouse sites following planning permission to determine which sites have been cleared from the baseline as a result of planning permission being granted; and
- Continued monitoring of planning applications relating to redundant glasshouse sites within and adjacent to the Agriculture Priorty Area.

Summary of action required

- Liaison at staff level with the Committee *for the* Environment & Infrastructure regarding the identification of redundant glasshouse sites with particular biodiversity interest;
- The Development & Planning Authority continue to liaise with the Committee *for* Environment & Infrastructure at an officer and political level with regards to

information on the small number of commercial glasshouse operations and the level of resources allocated to the horticultural census; and,

- The Development & Planning Authority to continue to liaise with the Committee *for the* Environment & Infrastructure at an officer level in relation to the development of the Energy Policy and to monitor any likely impacts this emerging policy may have on the number of planning applications relating to change of use of redundant glasshouse sites for renewable energy (Policy IP1).

Natural Resources

Introduction

The Future Guernsey Plan sets out, as part of its 20 year Vision for Guernsey, that we will be a safe and inclusive community which nurtures its unique heritage and environment and is underpinned by a diverse and successful economy. This is echoed in the Strategic Land Use Plan (SLUP) which has Core Objectives to improve the quality of life of Islanders and to support a successful economy while protecting the Island's environment, unique cultural identity and rich heritage through spatial planning policies that enable:

- The wise management of Island resources such as land, air quality, energy and water;
- Support to be given to corporate objectives and associated policies relating to the conservation of energy, reduction of our carbon footprint, development of renewable energy and adaptation to climate change; and,
- The protection of local biodiversity and the countryside.

The SLUP states that the quality of Guernsey's natural environment is important, not simply for its inherent value, and for its contribution to quality of life but also its importance for social well-being and to the Island's economy. It notes that there are valuable landscapes such as the coastal areas, open common, managed fields, valleys and escarpments that all contribute to the important local character of the rural environment. There are also areas of acknowledged and important biodiversity. The SLUP also emphasises the importance of climate change adaptation and mitigation.

The SLUPs Linking Policies refer to:

- Ensuring the physical and natural environment of the Island is conserved and enhanced;
- Achieving the prudent use of natural resources, including those that may enable the supply of renewable energy;
- Enabling the development and use of renewable energy;
- Improving the energy efficiency and carbon performance of new buildings;
- Reducing, where practicable, the Island's contribution to greenhouse gases;
- Ensuring new and existing building stock is more resilient to climate change impacts; and,
- Incorporating sustainable drainage measures and high standards of water efficiency in new and existing building stock.

The Island Development Plan (IDP) incorporates a range of policies that seek to deliver the SLUPs objectives and policies, both at a spatial strategy level, directing development and concentrating it in more sustainable locations thereby protecting biodiversity and open land, and a detailed level with policies to encourage resilience to climate change and use of renewable energy. It should be noted that the IDP policies are not the only mechanism to deliver these aims and other strategies such as States' policies for energy and transport also contribute.

The IDP has objectives to "Make the most effective and efficient use of land and natural resources" (Plan Objective 1), "Manage the built and natural environment" (Plan Objective 2) and "Support a healthy and inclusive society (Plan Objective 4). The Natural Resources report covers a broad range of issues that are distinct but contribute overall to these objectives. The report includes analysis of the effectiveness of policies relating to Sites of Special Significance, Areas of Biodiversity Importance, Important Open Land, Flood Risk, Renewable Energy and Air Quality. Relevant policies include S1, GP1, GP2, GP3, MC1, LC1, GP9, IP1, and IP10.

IDP Policy IP5: Safeguarded Areas states that Safeguarded Areas shall be protected from any development that may compromise their future implementation for strategically important development. 3 areas are designated on the Proposals Map as Safeguarded Areas:

- Chouet Headland for possible mineral extraction;
- Les Vardes Quarry for possible water storage; and,
- Land to the east of airport land for a possible runway extension.

In terms of the natural resource of minerals at Chouet Headland, Policy IP5 requires a Development Framework to be in place prior to development within a Safeguarded Area. Work began in 2017 on preparing a Development Framework for the Chouet Headland in relation to possible mineral extraction and a draft has been published for consultation. With regards to the use of Les Vardes for water storage, in its response to the consultation for the AMR, STSB comment that the continued safeguarding of Les Vardes remains appropriate. It states that "this allocation secures a future option to develop longer-term resilience to more severe drought than Guernsey has historically experienced, which is prudent given uncertainty over how severe climate change will be in the future". The Guernsey Water Business Plan 2016-2025 states that the a water resource management plan "will review our need for further water storage capacity at Les Vardes and the potential to rationalise our existing quarry assets". The continued need for these sites to be safeguarded will be kept under review as part of the Strategic Development and Infrastructure thematic report.

Progress with this site and mineral extraction generally will be monitored as part of the Strategic Development and Infrastructure thematic report.

IDP Policy GP1: Landscape Character and Open Land states that proposals will not be supported if they would result in the unnecessary loss of open and undeveloped land which would have an unacceptable impact on the open landscape character of an area, and that development will be supported where it respects the relevant landscape character type within which it is set. The character types are set out in an Annex to the IDP. This Annex was based on the Guernsey Character Study (Stage 1), 2013. A Stage 2 Character Study was proposed in the Stage 1 report to be a detailed assessment that will build on the evidence collected in Stage 1. It will provide a finer level of detail and assess the character and distinctiveness of individual areas or neighbourhoods in both the urban and rural areas and will identify priority areas for the maintenance, enhancement and/or restoration of that character. The Stage 2 Character Study has not yet commenced but when this study is completed, the implications for the IDP policies will be considered and the potential for monitoring indicators.

A Guernsey Habitat Survey is conducted approximately every 10 years. The last survey was in 2010. The project to produce a new Habitat Survey is ongoing with survey work complete and a report due to be published in quarter 2 of 2019 by the Committee *for the* Environment & Infrastructure (C*f*E&I). The findings of the survey and the implications for the IDP policies will be considered in future monitoring, although initial findings have informed the AMR thematic reports on Redundant Glasshouse Sites and Agriculture and Horticulture. The C*f*E&I in its response to consultation for the AMR noted that the research will "identify the highest priority habitats and species for conservation action". The Habitat Survey will be a useful tool for the Planning Service to be able to identify important habitats alongside other technical evidence such as the research informing the designation of Sites of Special Significance and Areas of Biodiversity Importance.

2017 AMR Action Update - The 2017 AMR included an action to review the findings of the Guernsey Habitat Survey 2020 when complete. This action is carried forward.

The States' approved the 'A Biodiversity Strategy for Guernsey', in 2015 and this helps to set a framework within which Guernsey's biodiversity can be protected and enhanced. The C*f*E&I has provided an update on progress with the Biodiversity Strategy and this is included in Appendix 1. The C*f*E&I notes that "work to implement the Biodiversity Strategy is progressing well and there have been a number of notable accomplishments in 2018" and "the development of appropriate and wide ranging wildlife habitat protection legislation is in hand, the Committee having supported a project to review and consult on a new statutory basis to replace the patchy and limited current provision. It is anticipated that this will in due course augment and enhance the Island's capacity to provide effective protections as envisaged in the IDP but which fall outside the traditional reach of planning legislation".

La Société in its response to consultation for the AMR commented that Sites of Special Significance (SSS) and Areas of Biodiversity Importance (ABI) "cannot provide adequate protection for local habitats and associated wildlife by themselves. Far more consideration of biodiversity needs to be ingrained within the IDP, particularly if it is to meet its Principal Aim" and "SSSs and ABIs alone will not halt the ecological decline and it is therefore critical that other protective measures are includes within the IDP". La Société recommend that a number of other IDP policies include consideration of environmental impacts, such as policies for leisure and recreation, Important Open Land and redundant glasshouse sites, with reference to appropriate mitigation and offsetting measures. The IDP includes a commitment to consider the Biodiversity Strategy, and details emerging from it, when considering proposals for development that may affect a Site of Special Significance or an Area of Biodiversity Importance. If and when further detailed policy or guidance arises from the Biodiversity Strategy and is approved the implications for the IDP policies will be considered in future monitoring to review the support the IDP gives to the Biodiversity Strategy. The Authority will also consider any land use policy implications for IDP policies of the proposed wildlife habitat protection legislation.

A Policy Letter from the Policy & Resources Committee 'Policy & Resource Plan – 2018 Review and 2019 Updates' will be debated by the States in June 2019. The Policy Letter states that "Government must continue to reduce Guernsey's contribution to global climate

change through the policies it develops and the services it delivers. It has made a good start with many factors relating to climate change included in existing work streams such as energy policy, hydrocarbons supply programme, renewables, integrated transport strategy, waste strategy, biodiversity strategy and the long-term infrastructure investment plan". The States are asked to decide if a policy priority area should be 'mitigate climate change' and if the C*f*E&I should develop a climate change policy and a 'Climate Change Action Plan' in a Policy Letter no later than May 2020. The implications for the IDP of the outcome of this debate and any subsequent plans for climate change will be considered in future monitoring.

Sites of Special Significance

The Land Planning and Development (Guernsey) Law, 2005 makes provision for the designation of Sites of Special Significance (SSSs) through Development Plans or Subject Plans. A SSS may be designated if it has been identified as an area having a special significance, whether because of archaeological, historical, botanical, geological, scientific, cultural, zoological or any other interest, which it is desirable to preserve, enhance or manage by the application of special provisions. For the purposes of designation in the IDP, areas of special botanical, scientific or zoological interest were considered.

There are 9 SSSs designated in the IDP, covering 839 hectares. The 9 SSSs can be seen on the IDP Proposals Map. They are known as:

1. Cliffs;
2. Fort Hommet headland & Vazon Coast;
3. La Claire Mare, La Rousse Mare, the rest of the Colin Best Nature Reserve, Lihou headland & L'Erée shingle bank;
4. L'Ancresse Common;
5. Les Vicheries & La Rue Rocheuse (extending to La Saline & Rocquaine sand dunes);
6. Lihou Island;
7. Port Soif to Pont du Valle (including Vale Pond & extending to Cobo);
8. South Vazon & La Grande Mare wet meadows; and,
9. St Sampson's Marais & Château des Marais.

The Land Planning and Development (General Provisions) Ordinance, 2007, Part 1, Section 4 extends the definition of development within a SSS, resulting in works normally not constituting development requiring planning permission, such as any works which disturb the ground, or significant clearance of vegetation where this would materially affect the special interest of a SSS. This places significant constraints on development that might harm the special interest of a SSS. A significant number of exemptions from the requirement for planning permission under the Land Planning and Development (Exemptions) Ordinance, 2007 are not available in SSSs and certain changes of use to agricultural and horticultural uses amount to development in those areas when they do not in others.

There are no residential uses within the SSSs designated in the IDP, but it is recognised that there are existing commercial and recreational uses in these areas. IDP Policy GP2: Sites of Special Significance is therefore flexible enough to allow reasonable opportunities to maintain and expand activities associated with these existing uses where it is consistent with other IDP policies. Therefore, whilst policies provide a high level of protection in these

areas in recognition of their special interest, the IDP policies have the flexibility to support and balance economic requirements and social wellbeing with conserving natural resources as required by the SLUP. Even where new development may have a negative impact on special interest there is the opportunity for an applicant to demonstrate that the impact can be acceptably mitigated or offset (Policy GP2).

In 2018 there were 19 planning applications in SSSs. All of these were approved as they did not have unacceptable effects on the special interest of the SSSs. Of the 19 approvals – 8 were in the Cliffs SSS, 2 in the La Claire Mare etc SSS, 7 in the L'Ancresse Common SSS, 1 in the Port Soif to Pont du Valle SSS and 1 in the Fort Hommet headland & Vazon Coast SSS.

The types of development approved in SSSs is shown in Figure 1 below. Most planning permissions relate to minor forms of development such as interpretation boards and memorial benches or existing buildings or structures within a SSS. Only 1 application in 2018 involved groundworks on an undeveloped part of a SSS. This was an application from the States (C*f*E&I) for the clearance of an area of scrubland to allow for grazing of livestock at Icart, St Martin. The designation of the SSSs were informed by the Environment Guernsey report 'Appraisal of Sites of Special Significance'. The report recommends specific procedures for enhancement of SSS sites and the proposal was considered to consistent with this advice and Policy GP2.

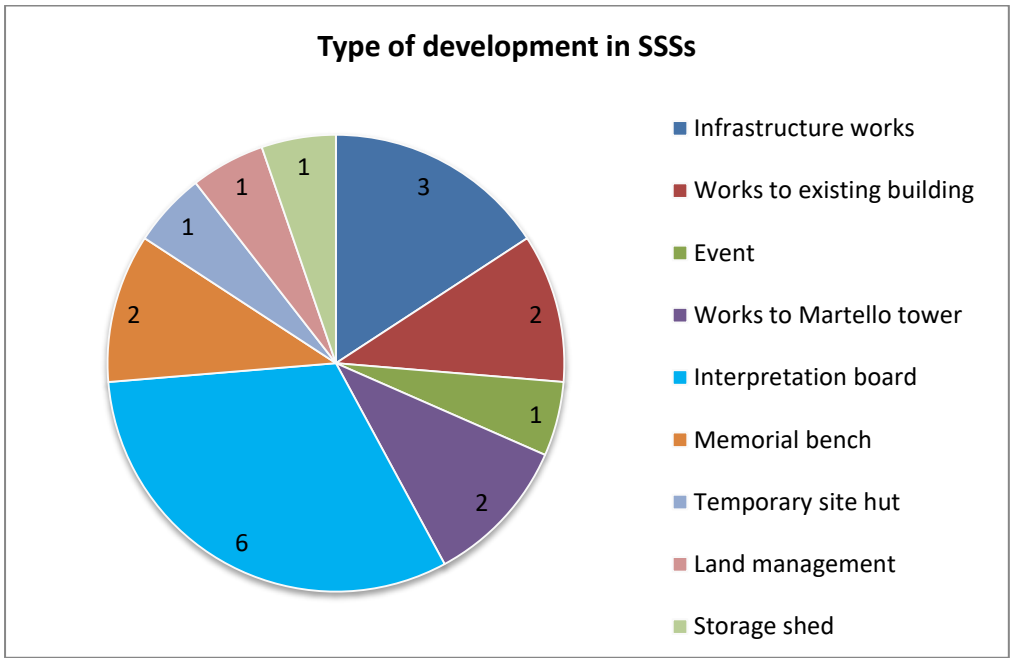


Figure 1: Type of development permitted in Sites of Special Significance

Where a development proposal has the potential to impact on the special interest of a SSS, the Authority requests precise details of the extent of works and consults La Société Guernesiaise and Environment Guernsey.

Sites of Special Significance Supplementary Planning Guidance

In time it is the intention of the Authority to publish guidance for the whole or part of each SSS as Supplementary Planning Guidance (SPG). The aim of the guidance will be to help

understanding of how best to avoid any negative impacts of development on the special interest of the SSS, to identify development that, if carried out in a specific manner, would not need planning permission and to identify the opportunities for enhancement of the area's special interest that might exist through development.

The Authority will work with the C*f*E&I, alongside work associated with the Biodiversity Strategy, to bring forward this guidance. The project to produce these 9 SPGs has been initiated. An update on progress will be included in future monitoring.

There has been no feedback from consultation for this AMR that the IDP policies have unduly hindered legitimate activity from taking place in a SSS. This will however be kept under review and taken into account as guidance is developed for each area.

INDICATOR – publish guidance for the whole or part of each Site of Special Significance		
Plan Objective		Plan Objective 2: Manage the built and natural environment.
Target		Minimum of 9 SPGs.
Outcome	2018	Project initiated.
	2017	No progress to date.
Target met?		No.
Comments (including any risks to delivery)		This project requires significant resources in terms of officer time.
Action		2017 AMR Action Update - the 2017 AMR included an action to initiate the project to produce Supplementary Planning Guidance for the whole or part of each Site of Special Significance. The project has been initiated. Action - Progress the project to produce Supplementary Planning Guidance for whole or part of each Site of Special Significance.

Areas of Biodiversity Importance

Guernsey's most important sites for biodiversity are identified as SSSs and the planning legislation and policies in the IDP afford a high level of protection in these areas. There are, however, a number of other sites that do not have a sufficient level of special interest to be designated as a SSS but nevertheless contribute significantly to the biodiversity of the Island. The designation of Areas of Biodiversity Importance (ABI) provides a mechanism to offer a focus on biodiversity and some protection and enhancement of such sites when development proposals are being considered. Some of the ABIs support the special interest of a SSS by providing either natural buffers or wildlife corridors.

There are 84 ABIs designated in the IDP including the Foreshore ABI. 27 ABIs are related to SSSs. In total, the ABIs cover an area of 196 hectares.

IDP Policy GP3: Areas of Biodiversity Importance supports development within an ABI provided the biodiversity interest of the site has been considered and any negative impacts

can be appropriately and proportionately mitigated. The policy does not apply to householder development within the curtilage of a dwelling.

In 2018 there were 12 planning applications for sites that included land within ABIs. 11 of these were approved and 1 refused. The 11 approvals were for minor forms of development as can be seen in Figure 2 below. In these cases there was little or no impact on the biodiversity interest of the sites. The planning application that was refused was for the erection of a 3 storey building for 9 apartments and basement parking. This was refused due to a number of issues with the proposal including that the landscaping as shown on the application drawings was minimal, and, as such, the mitigation afforded to the Area of Biodiversity Importance was very limited. The proposal was considered to not comply with Policy GP3 which requires that the biodiversity interest of the ABI should be considered and where possible enhanced, and that any negative impacts are appropriately and proportionately mitigated in accordance with a scheme to be approved by the Authority.

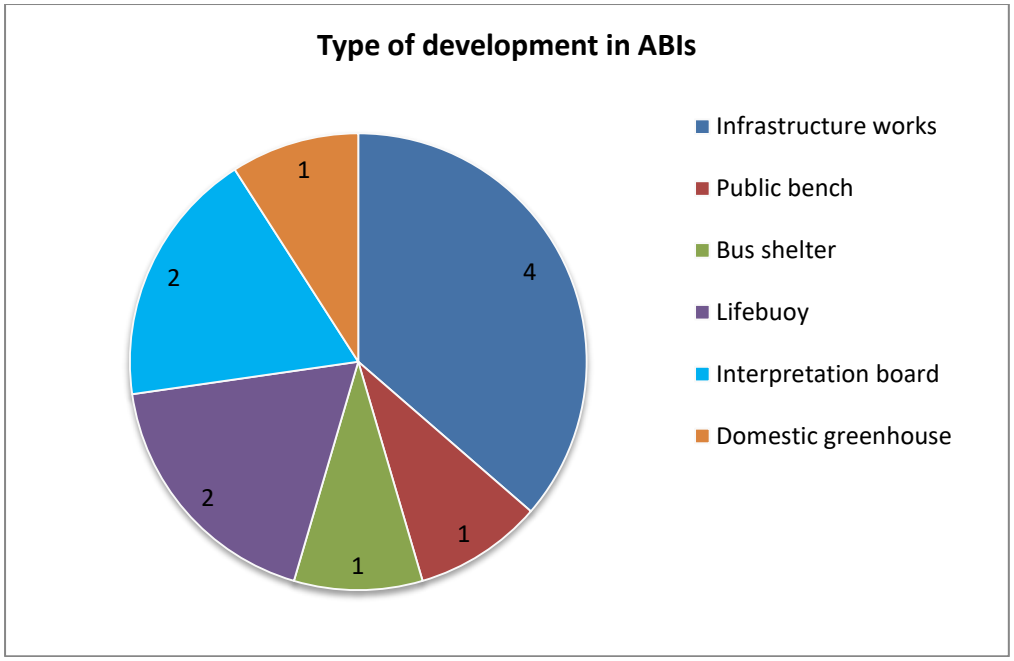


Figure 2: Type of development permitted in Areas of Biodiversity Importance

No issues with Policy GP3 were raised in the feedback received for the AMR. The Policy is performing as intended.

The evidence base referenced in the production of the IDP with regards to those ABIs not associated with a SSS has become dated. The most recent survey of these sites was the 'Sites of Nature Conservation Interest within the Urban Area Plan, 2006' (by La Société Guernesiaise and Environment Guernsey) and the Review of Sites of Nature Conservation Importance in the Revised Rural Area Plan, 2003' that was carried out by La Société Guernesiaise.

La Société comment in their response to consultation for the AMR that "undesignated land which may become biodiverse over time, has little or no protection from development or other damaging operations. Much of the ABI complex was formed by converting the former

Sites of Nature Conservation Importance (SNCIs) network from the RAP and UAPs. Therefore most ABIs were last evaluated more than 15 years ago and a new assessment of these areas, and potential new ones, is urgently required".

A commitment was made by the former Environment Department during the IDP Public Inquiry hearings to re-survey those sites and to carry out Island analysis to identify any additional ABIs. This project has been initiated in 2019 and an update on progress will be given in future monitoring.

The ABIs that form buffers and corridors associated with the SSSs were identified through the 'Appraisal of Sites of Special Significance' by Environment Guernsey in 2014. These ABIs will therefore not require to be resurveyed but will be assessed again when the SSS Supplementary Planning Guidance documents are produced and if necessary a new survey of the ABIs in the particular area could take place and the appropriateness of the ABI designation considered at that time. The Foreshore ABI was also identified in the Environment Guernsey report and therefore also does not need to be resurveyed. Any changes to the existing ABIs or identification of new ABI designations would require formal amendment of the IDP.

INDICATOR – survey Areas of Biodiversity Importance		
Plan Objective		Plan Objective 2: Manage the built and natural environment.
Target		Survey of 56 Areas of Biodiversity Importance and analysis of any new areas.
Outcome	2018	Project initiated.
	2017	Project initiated.
Target met?		No.
Comments (including any risks to delivery)		This project requires significant resources.
Action		2017 AMR Action Update - the 2017 AMR included an action to Survey the Areas of Biodiversity Importance other than the Foreshore and those Areas associated with a SSS and identify any new Areas of Biodiversity Importance. This action is carried forward.

Important Open Land

The SLUP states that the quality of Guernsey's natural environment is important, not simply for its inherent value, but for its contribution to quality of life and social wellbeing and to the Island's economy. The SLUP highlights the particular importance of the unique, small scale, intricate landscape which is found in the Channel Islands and that coastal landscapes, open common, managed fields, valleys and escarpments are important landscape features. Within and around the Main Centres and within some Local Centres there are areas of open land that provide breathing space within the built environment and, in most cases offer views across open land. The can also assist with Sustainable Urban Drainage in some areas. The special qualities of these areas need to be protected from insensitive development that could detract from their value and the amenity that they provide in otherwise built up areas. Therefore the IDP Policies for Important Open Land provide protection from

development that would adversely affect the landscape character and visual quality of the areas and detract from their value.

IDP Policies MC1 and LC1 relate to Important Open Land in Main Centres / Main Centre Outer Areas and Local Centres respectively. The policies support development on land designated as Important Open Land where it relates to new outdoor formal recreation or informal leisure and recreation or it relates to work to existing buildings or structures and subject to the impact of the development on the open character and visual or landscape character of the land.

There are areas of Important Open Land in the St Peter Port Main Centre/Outer Area, the St Sampson/Vale Main Centre/Outer Area and the Local Centres at St Martins and St Pierre Du Bois. These areas are extensive within the Centres, as shown in Figure 3 below.

	Size of Centre (hectares)	Size of Important Open Land (hectares)	Important Open Land as a % of the Centre
St Peter Port Main Centre	413.44	61.66	14.9%
St Sampson / Vale Main Centre	221.17	25.298	11.4%
St Martin Local Centre	33.27	5.051	15.2%
St Pierre Du Bois Local Centre	10.7	3.217	30.1%

Figure 3: Areas of Important Open Land in Main Centres and Local Centres

There were 15 planning applications in 2018 within areas of Important Open Land. These were all approved. 14 were in St Peter Port, 1 in St Sampson/Vale and none in Local Centres. 7 applications were for domestic outbuildings or alterations to dwellings, 1 application to erect 4 dwellings was partially within an area of Important Open Land, the remaining applications were for works to utilities, interpretation boards, a change of use of agricultural land to domestic garden and a storage shed for Candie Gardens. The proposals were not considered to have any significant impact on the open character or landscape character of the Important Open Land. The permission for 4 dwellings included a condition preventing ordinarily exempt domestic structures (sheds etc) from being erected within the part of the site within Important Open Land (to be used as gardens) as these could have a detrimental visual impact.

La Société in its response to consultation for the AMR comment that it is concerned that issues relating to habitats and associated biodiversity are not included within policies for Important Open Land. The purpose of the policies is to protect the special qualities of these areas from insensitive or inappropriate development that could detract from their value and the amenity that they provide in terms of open character, visual quality or landscape character rather than habitats and biodiversity. Where such land also has identified biodiversity value, it is designated as either a SSS or ABI and appropriate protection offered through policies relating to these areas. The potential for an evidence based review, as part

of the 5 year review of housing land supply, of the criteria / definition of Important Open Land to make sure it is still appropriate and consideration of whether there is evidence that some designations need to be added or changed in view of development which has happened over the first 5 years of the IDP is considered in the Housing thematic report. That report also considers the potential for greenfield sites to be developed.

Flood Risk

There are a number of lower lying areas in Guernsey, mostly in the north-east part of the Island, which are vulnerable to flooding during present day extreme high tides. This vulnerability will increase with anticipated sea level rise. As a result there is both an existing, and an increased future flood risk to coastal communities.

The Guernsey Coastal Defence Flood Studies and approved strategy, 2013 (Billet d'État XV, July 2013) identifies extensive flooding caused by tidal or storm surge as a key corporate risk and focuses priority for capital works in the areas of St Sampson's Harbour and Belle Greve Bay. Proposals for new or replacement coastal defences will be considered against Policy S5: Development of Strategic Importance (Policy IP10: Coastal Defences refers to Policy S5). Policy S5 supports development of strategic importance that is clearly demonstrated to be in the interest of the health, or well-being, or safety, or security of the community, or otherwise in the public interest. Within the current States capital portfolio is a 'Coastal Flood Defences (Phase 1)' programme with 2 work streams including the provision of flood mitigation measures at St Sampson harbour (the Bridge) and Belle Greve Bay. Flood mitigation measures at St Sampson's harbour could help facilitate development of the Leale's Yard Regeneration Area (see the Strategic Development and Infrastructure thematic report).

The Flood Risk Assessment Studies have identified coastal areas within Guernsey considered to be at risk of flooding from 1 in 10, 50, 100 and 250 year coastal flood events as at 2012 see Figure 4 below. The areas at risk of flooding are at Cobo Bay and Saline Bay, Belle Greve Bay, St Sampson / Le Grande Harve, Bordeaux Harbour, Baie De Port Grat and Pequeries, Rocquaine Bay and L'Eree Bay and to a much lesser extent a flood risk was identified at Pembroke Bay.

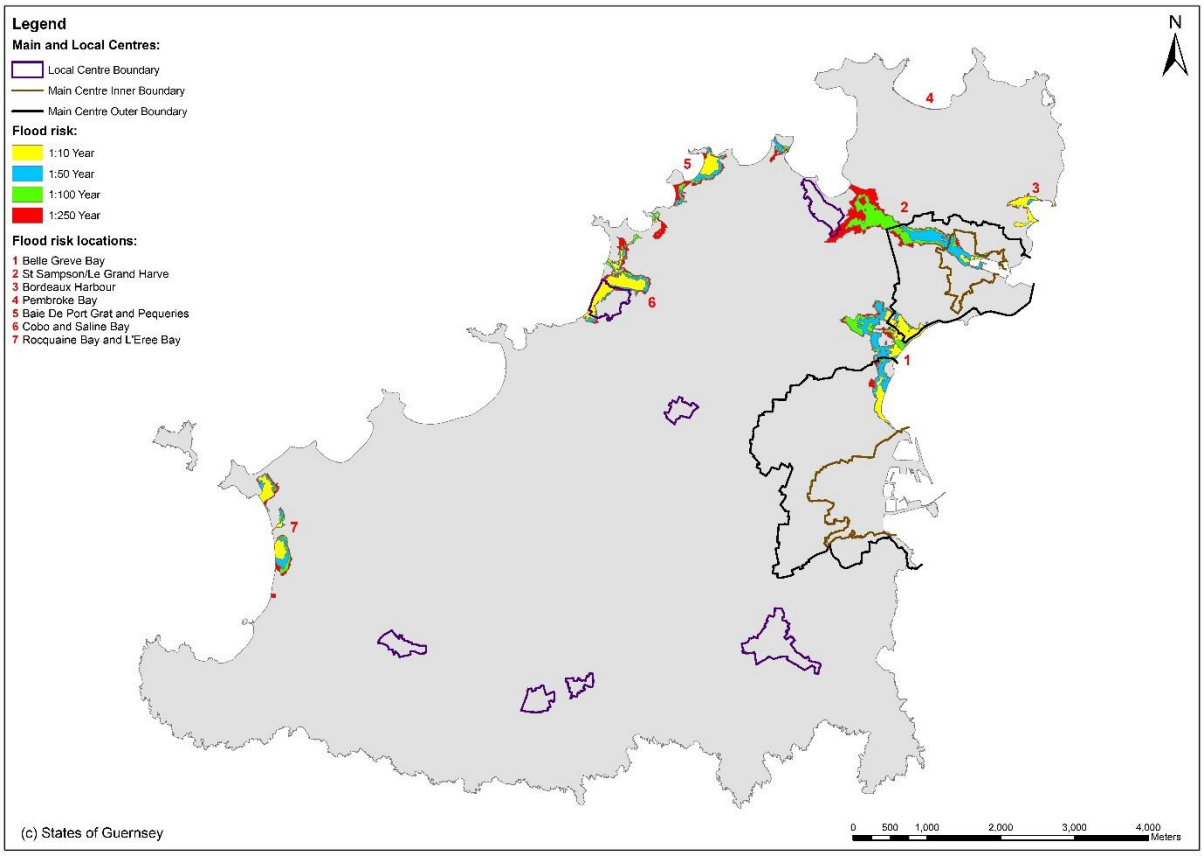


Figure 4: Flood risk areas

IDP Policy GP9: Sustainable Development requires development to be designed to take into account a building's resilience to climate change and flooding and include drainage solutions to address and, where necessary, mitigate any unacceptable increase in flood risk as a result of the development proposed.

To make effective and efficient use of land it would not be appropriate to prohibit development in the flood risk areas. The IDP recognises that some land uses will be more vulnerable to flooding as a result of climate change than others. The IDP therefore has an approach of managing development subject to flood risk and requiring design that is suitable for the location and encourages existing buildings to be adapted for climate change and the associated increased risk of coastal flooding.

For the purposes of monitoring, the AMRs will review planning permissions in the 1:10 year flood risk areas, as the areas most liable to flooding. In 2018 there were 27 applications in this area. 24 for works to existing buildings (1 was refused for reasons not related to flood risk), 2 replacement dwellings and a change of use of a restaurant to a dwelling. The majority were within the Cobo and Belle Greve Bay areas – see Figure 5 below – as was the case in 2017.

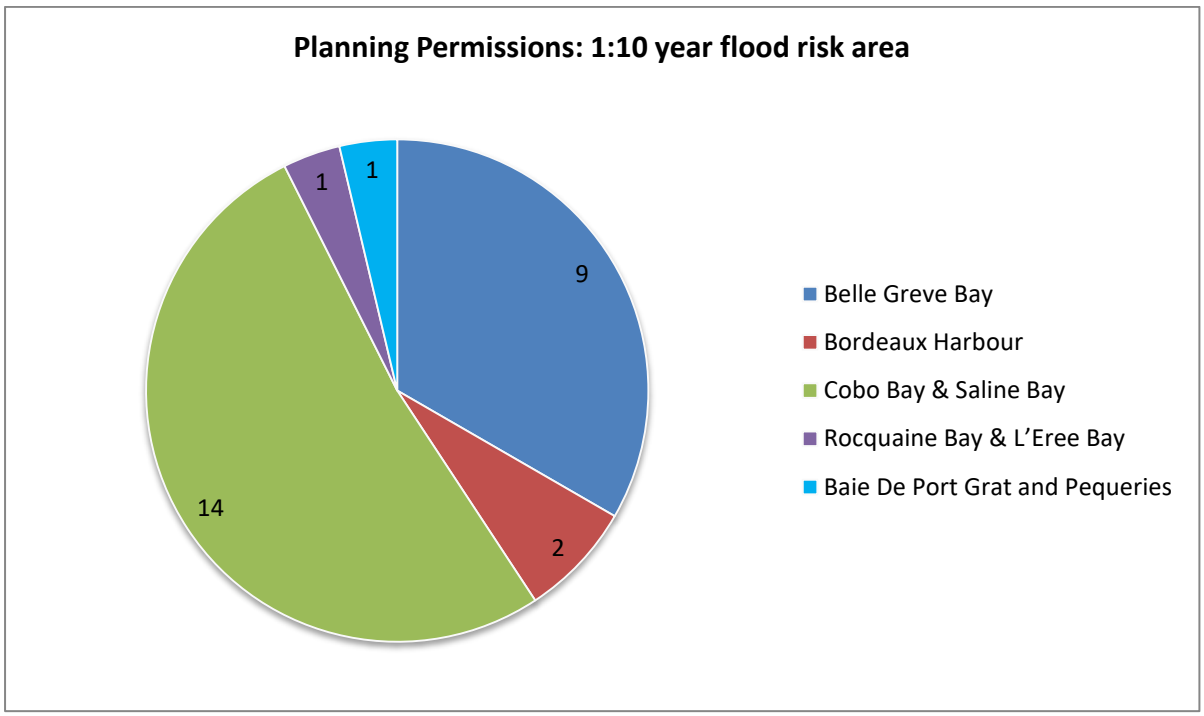


Figure 5: Planning permissions in the 1:10 flood risk area

In some cases, typically where advice has been received from Guernsey Water, planning conditions are attached to permissions that require surface water to be dealt with on site and not enter into the existing surface water system. This ensures that flood risk as a result of the development can be satisfactorily mitigated. It is standard practice to promote Sustainable Urban Drainage Systems (SuDS) and permeable paving.

The presence of flood risk is taken into account in work on Development Frameworks. Of the 6 Development Frameworks approved in 2018 1 site is at risk of flooding from 1 in 50, 100 and 250 year coastal flood events The Development Framework for this site notes that surface water drainage will need to be accommodated on the site by constructing a new soakaway system and using SuDS such as permeable paving to hardstanding areas. The use of SuDS on sites subject to a Development Framework will be monitored in future monitoring. Of the sites with approved Development Frameworks and subsequent permissions, SuDS have been included in the design where required in the Development Framework.

2017 AMR Action Update – the 2017 AMR included an action for the Planning Service to monitor the use of SuDS on larger developments approved under the IDP – those relating to sites with a Development Framework. This action is carried forward for further, more detailed analysis once more sites have planning permission.

In its consultation response to the Authority for the 2017 AMR, the States Trading and Supervisory Board (STSB) highlighted Guernsey Water's Surface Water Management Policy – endorsed by the C*f*E&I in 2016. This applies to retrofit Sustainable Urban Drainage Systems (SuDS) and the application of SuDS during new development or redevelopment. It has also published a guide to permeable surfaces. Both of these approaches support the implementation of IDP Policy GP9. In its response to the Authority for the 2018 AMR, the

STSB notes that in 2018 the Guernsey Water Board endorsed Guernsey Water's Surface Water Management Strategy, which sets out how Guernsey Water will deliver the Surface Water Management Policy. The STSB states that "this strategy is a long term plan to adapt the island's drainage systems to climate change; it supports the IDP General Policy (GP9): Sustainable Development. To achieve this Guernsey Water is planning to manage the run-off from 9,700 m^2 of impermeable area per annum over the next 30 years. This is dispersed between several target areas across the island. The target applies to retrofit schemes that are aimed at reversing the impact of historical development that has connected into the Island's drainage systems, without adequate surface water management. This has reduced the capacity of these systems to deal with climate change in the future".

2017 AMR Action Update – the 2017 AMR included an action for the Planning Service to work with Guernsey Water/STSB on the Surface Water Management Strategy to review the approach to requirements for SuDS. The Strategy has now been endorsed by the Guernsey Water Board.

The STSB also notes that "it will be important for the success of the strategy to ensure that going forward; new development does not further reduce the capacity of the drainage systems to deal with climate change. The best way of managing this is through the planning process and Guernsey Water would welcome the opportunity to discuss how it can work together with the DPA to achieve this".

Action – Planning Service to liaise with Guernsey Water to review the design of new development to help ensure that development does not further reduce the capacity of the drainage systems to deal with climate change.

Renewable Energy

Renewable generation of power is achieved by means such as the harnessing of energy from wind, tidal, wave, biomass or solar sources. Renewable energy ranges from energy produced on a commercial basis at a scale at which the majority of the energy produced is used beyond the generation site, to the production of energy primarily for use on the particular site concerned and generally at a much smaller scale. 26% of the energy supplied to Guernsey consumers in 2017 was derived from nuclear or renewable sources, compared with 21% in 2016. In 2017, total energy consumption decreased by 2.7% from 2016. Consumption per capita also saw a small decrease when compared with 2016 [source – Guernsey Facts and Figures, 2018].

IDP Policy IP1: Renewable Energy Production supports proposals for installations for the harnessing of renewable energy where the development can be satisfactorily incorporated into the built form of an existing or proposed development, or is located on brownfield land or a redundant glasshouse site (in certain circumstances). Development on other green field land is supported where the renewable energy infrastructure is subterranean and will not compromise the ability to use the land for agriculture.

During 2018 there were no planning applications to produce energy on a commercial basis from renewable sources.

The States' Trading Supervisory Board (STSB) response to consultation for the AMR includes comment from Guernsey Electricity and with regard to potential future on-island renewables projects, the view of both Guernsey Electricity and STSB is that IDP policies "could be more supportive, and may indeed need to be more supportive, to enable the island to meet its energy policy aspirations in future. This may require input from the Energy Programme and the relevant Policy work stream of the Committee *for the* Environment & Infrastructure". The STSB suggest that Policy IP1 is quite restrictive with regards to the requirement for renewable energy infrastructure to be subterranean on green field sites, other than redundant glasshouse sites.

Activity in this sector is quite limited and therefore Policy IP1 has yet to be tested other than 1 case in 2017. The Policy will be reviewed as part of work on the emerging States' Energy Policy – see below – to ensure that it remains effective in delivering the energy objectives and priorities of the States as identified in the Future Guernsey Plan. At present, under current law Guernsey Electricity can be the only company to supply electricity. As it stands at the moment a householder can only supply electricity for their own use as long as they are not supplying it to a third party. It appears that the potential 'block' to supply of electricity to individuals or companies from renewable energy is not the IDP policies which allow for the principle of solar farms etc on some sites and encourages the use of renewable energy infrastructure on others, but is to do with electricity supply mechanisms.

IDP Policy GP9: Sustainable Development requires proposals for new development, and the refurbishment, extension and alteration of existing buildings, to be designed to take into account the use of energy and resources. During 2018 there were 25 planning permissions to incorporate renewable energy equipment into the built form of an existing or proposed development – see Figure 6 below.

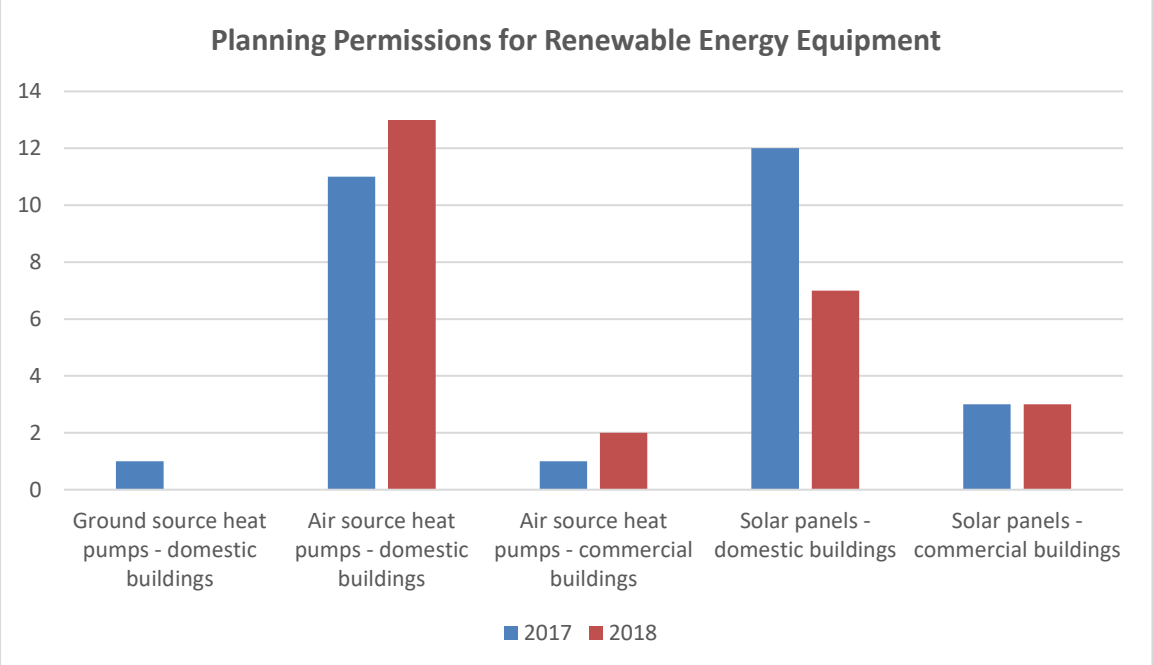


Figure 6: Planning permissions for renewable energy equipment

These 25 permissions represent a small portion of the circa 1,500 planning applications submitted each year. There is potential to do more to promote renewable energy equipment to help deliver more sustainable development and to reduce energy demand and this will be achieved through the States' Energy Policy and other strategies. At present compliance with Policy GP9 does not require a proposal to incorporate renewable energy equipment. It is acknowledged that, as stated in Policy GP9 there are other aspects of design that contribute to the sustainability of a building such as location, orientation, the form of construction and the materials used.

INDICATOR – increase the supply of energy through renewable sources		
Plan Objective		Plan Objective 1: Make the most effective and efficient use of land and natural resources.
Target		None.
Outcome	2018	n/a
	2017	n/a
Target met?		n/a
Comments (including any risks to delivery)		The proportion of applications that include renewable energy equipment is significantly low.
Action		2017 AMR Action Update – the 2017 AMR included an action for the Development & Planning Authority to liaise with the Committee *for the* Environment & Infrastructure at an officer and political level to promote the use of renewable energy equipment and infrastructure in accordance with Policies GP9 and IP1 as part of development of the Energy Policy. This action is carried forward.

Energy Policy

The States has identified the formulation of an energy policy as one of the 22 States priorities identified in the Future Guernsey Plan. This policy encompasses renewable energy, infrastructure and security of supply of essential commodities (i.e. affordable and resilient supply of fuels). The main work streams within this policy are the formulation of an overarching Energy Policy for Guernsey which will address sustainability measures and which will inform future work in relation to the supply of hydrocarbons, the use of renewable energy and the Infrastructure Investment Plan. The implications for the IDP policies of this policy will need to be considered in due course.

By way of update on progress with the Energy Policy, the C*f*E&I in its response to consultation for the AMR notes that the "Committee is progressing Energy Policy for tabling to the States of Deliberation. It is worth noting the rapid evolution of the energy market both on a macro level in relation to policy supporting moves to decarbonisation and technological advances. The resulting energy transition towards electrification will impact domestic requirements such as electric vehicle charging point installations (both private and public) and energy infrastructure including domestic renewables, utility scale renewables, storage capabilities and importation facilities". A Policy Letter from the Policy & Resources Committee 'Policy & Resource Plan – 2018 Review and 2019 Updates' will be debated by the States in June 2019. The Policy Letter states that the C*f*E&I aims to "lay before the States, in

Q3 2019, propositions and an accompanying policy letter setting out recommendations for an Energy Policy for Guernsey."

The Committee *for* Economic Development states that it "recognises that the development of renewable energy infrastructure in Guernsey has the potential to contribute positively to the economy, and will therefore be working with Committee *for the* Environment & Infrastructure ("C*f*E&I") to ensure that the potential economic benefits are taken into account as part of work towards a new Energy Plan. The Committee intends to work with C*f*E&I to develop a clearer understanding of the future demand and nature of renewable energy production, as well as the economic value this may bring to the island. The Committee envisages that this work will involve consideration of the enablers which need to be in place to facilitate renewable energy generation in Guernsey, including an assessment of the suitability of existing planning policy".

Air Quality

The SLUP states that Guernsey has generally excellent air quality but the main factors affecting air quality are the growth in motor traffic and fuel consumption, which creates localised pollution. The SLUP notes that the planning system is able to influence the location of development and the movement of traffic by reducing the need to travel and subsequently addressing localised pollution problems and may condition planning approvals to support Environmental Health regulations.

Guernsey's Greenhouse Gas emissions come from a range of sources (data sourced from the Guernsey Annual Greenhouse Gas Bulletin 2017) - see Figure 7 below. In 2017, Guernsey's emissions totalled 355.4kt of CO2 equivalent, which equates to 5.7 tonnes per capita. The total was 10.5% lower than in 2016 and 35.7% lower than in 1990.

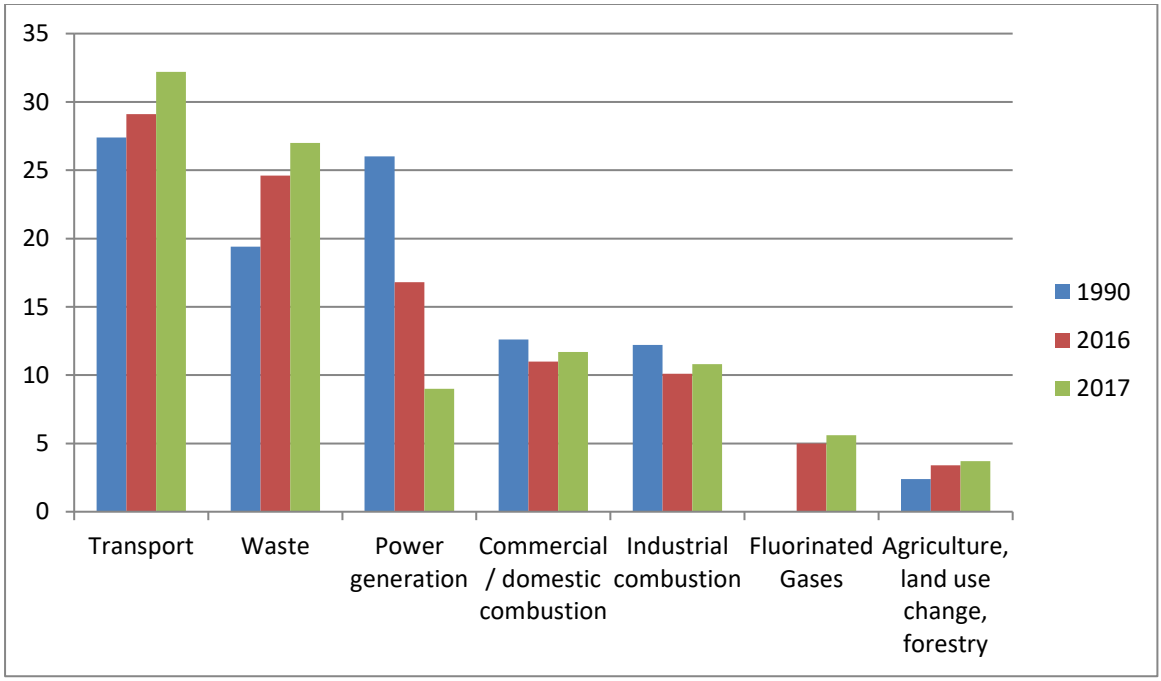


Figure 7: Percentage contribute of emissions by source

A number of IDP policies contribute toward an improvement in air quality in the island. Of the sources of Greenhouse Gas emissions, of particular relevance to IDP policies are the emissions from transport, waste and the commercial and domestic combustion of fuels for heating and hot water in homes and offices etc.

Transport contributed the largest proportion of total emissions in both 1990 and 2017, at 27.4% and 32.2% respectively. However, emissions from transport have actually decreased between 1990 and 2017 by 24.6% (37.3kt of CO2 equivalent) to 114.5kt of CO2 equivalent. 65% of transport emissions resulted from on-island road transport in 2017, with a further 22% from aviation and 11% from navigation. Levels of greenhouse gases emitted as a result of transport have generally been trending downwards since a peak in 2000.

Nitrogen dioxide is a gas generated from the combustion of fossil fuels (principally by motor vehicles) and is one of a range of air pollutants monitored in Guernsey. Nitrogen oxides (including nitrogen dioxide) contribute to acid rain, depletion of the ozone layer and can have detrimental effects on health. They are also greenhouse gases. Figure 8 shows the annual average concentration of nitrogen dioxide recorded in Guernsey each year. Levels of nitrogen dioxide in Guernsey are below the guideline maximum of 40μgm^{-3} set by the World Health Organisation (WHO).

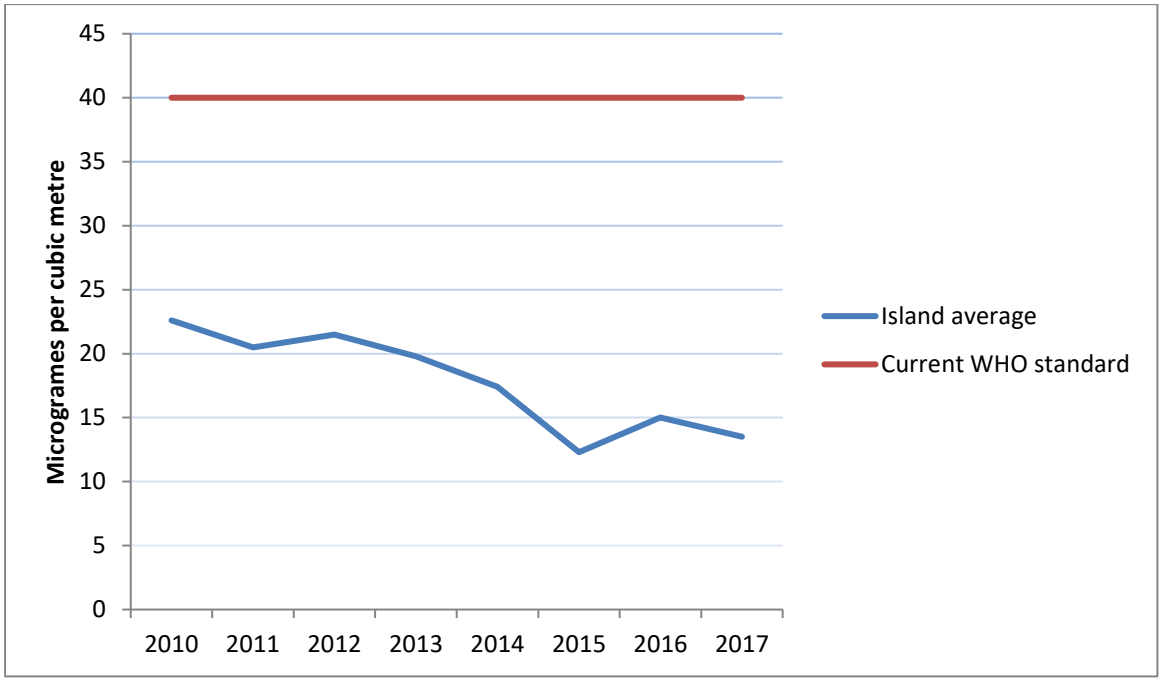


Figure 8: Nitrogen dioxide levels
Source: Environmental Health and Pollution Regulation

In terms of transport, the IDP policies support the implementation of the Integrated Transport Strategy and facilitate 'modal shift' and convenient access by modes other than the motor car. Policy S1: Spatial Policy aims to concentrate development in the Main and Local Centres which consolidates the majority of social and economic activity in the areas that have the best access to public transport and services and reduces the need to travel by car. Policy GP8: Design requires proposals to consider how development can be designed to provide the necessary infrastructure and facilities in order to support a range of practicable

transport options for reaching the site including facilities that will assist in people being able to commute by bicycle, motorcycle or on foot. Policy IP6: Transport Infrastructure and Support Facilities requires development to be well integrated with the transport network and supports development proposals that encourage a range of travel options to and within the Main Centres and the Main Centre Outer Areas. Policy IP7: Private and Communal Car Parking requires provision of appropriate levels of parking in accordance with the guidance set out in Supplementary Planning Guidance: Parking Standards and Traffic Impact Assessment[1]. This emphasises the importance of designing development to meet the needs of bicycles as well as motor cycles and disabled parking, and sets maximum standards for general car parking in the Main Centres and Main Centre Outer Areas.

Within the resolutions of the Integrated Transport Strategy is a requirement for the C*f*E&I to report back to the States by December 2018 on the effectiveness of the Strategy. The C*f*E&I has stated that "unfortunately, due to competing demands on resources, this has been delayed and it is hoped to complete this policy letter for submission by the middle of this year [2019]". The C*f*E&I has stated that this policy letter will review/update the Strategy to include analysis of the effectiveness of the measures implemented to provide transport choice and encourage modal shift, and recommendations in relation to changes that may be required in order to continue to deliver the Strategy Vision. This will provide context for future monitoring of modal shift. The effectives of the IDP policies for car parking are considered in the Public and Private Parking thematic report.

Waste was the second largest contributor to Guernsey's total emissions in 2017. It contributed 27.0% (96.1kt of CO2 equivalent) of the total emissions in 2017. The emissions are mostly (95%) in the form of methane gas, which is released as landfilled matter decomposes. There have been decreases in the emissions from this source since 2006. This mirrors the trend in waste going to landfill during these years. The cumulative decrease between 1990 and 2017 was 10.4% (or 11.2kt of CO2 equivalent).

The IDP encourages the consideration of the reduction of construction waste at the earliest stages of the design process and throughout the construction and pre construction phases of development through a requirement for the submission of a Site Waste Management Plan with planning applications for certain development. The monitoring of construction waste is set out in the Construction Waste thematic report.

Commercial and domestic combustion of fuels for heating and hot water in homes and offices etc also contribute a substantial amount of the Island's emissions (11.7% of the 2017 total). The emissions from commercial and domestic combustion were 41.7kt of CO2 equivalent in 2017, which was 40.1% lower than in 1990.

The energy efficiency of buildings is addressed in IDP Policy GP9: Sustainable Development which promotes and enables all new development (i.e. buildings and external spaces) to reduce its overall environmental impact and minimise the use of energy and resources by considering the following factors from the outset of the design process: the location, orientation and appearance of the building; its form of construction and selection of

[1] SPG: Parking Standards and Traffic Impact Assessment

materials (e.g. those with low embodied energy); the use of renewable energy technologies; opportunities to mitigate or adapt to climate change (e.g. risks of flooding and surface water run-off); and for development over a specific size consider how any waste is managed. In order to assess the quality of new development, in future development that is approved under the IDP and is completed, over a given size threshold, will be monitored for the quality of design. The monitoring of the energy efficiency of buildings is set out in the Built Heritage and New Development thematic report.

A survey carried out by the Office of Environmental Health and Pollution Regulation into air pollution in Guernsey concluded in April 2016. The survey was conducted to gauge Islanders' current views on air pollution and to make recommendations to the States on what controls we need. The results of the survey were used to inform a Policy Letter that was debated by the States in February 2017. The revised legislation (Part VII (Air Pollution) of the Environmental Pollution (Guernsey) Law, 2004) will need to be drafted before the proposals are legally binding. The C*f*E&I state that drafting of the air pollution ordinance commenced in Q4 2018.

The proposals include a set of Air Quality Standards to be used as a benchmark for ambient air quality monitoring programmes which establish the state of the air environment and inform any decision making for future developments and controls that may need to be applied. Any breaches in air quality standards are attributed to pollution from point and line sources e.g. combustion and industrial plant, traffic emissions etc. The standards will also be used to inform the management of traffic flows around the Island and for the setting of conditions for "prescribed operations" to ensure that local ambient air quality is not compromised by their emissions to the air.

The implications for the IDP policies of the revised legislation will be reviewed in future monitoring.

The effectiveness of the IDP policies that contribute toward improvements in air quality are monitored elsewhere in the AMR as set out above. The overall impact of these policies will be kept under review in future monitoring in relation to air quality indicators and Greenhouse Gas emissions indicators published by the States.

Summary

In summary, the SLUP requires the wise management of Island resources such as land, air quality, energy and water and the conservation of energy, reduction of our carbon footprint, development of renewable energy and adaptation to climate change, and the protection of local biodiversity and the countryside.

The IDP policies need to balance these requirements for the natural environment with the needs of the economy and social wellbeing. This balance comes from the Spatial Policy which concentrates development in the Centres, reducing the need for further development of green spaces elsewhere, and the designation of areas for their biodiversity or landscape value. The monitoring above has found that the IDP policies for SSSs and ABIs are operating as intended and have provided for a proportionate approach with two levels of protection, giving a higher level protection where there is particular special interest, but allowing for

development in ABIs where impacts are considered and mitigated. In addition, the policies for Important Open Land have ensured these areas have been protected from adverse impacts through development.

The balance also comes from a number of policies to ensure that the design of development takes account of energy and climate change. These policies require further monitoring to assess if opportunities are being maximised through development to address flood risk, reduce surface water run-off, promote energy efficiency and encourage the use of more sustainable modes of transport.

Whilst there have been no major proposals to date for infrastructure to provide for public transport or renewable energy, for example, the IDP policies are flexible and allow for major infrastructure provision including any not envisaged at the time of writing the IDP through Policy S5: Development of Strategic Importance.

Summary of monitoring requirements

- Review the findings of Guernsey Habitat Survey when complete; and,
- Monitor the use of Sustainable Urban Drainage Systems on larger developments approved under the IDP – those relating to sites with a Development Framework.

Summary of action required

- Progress the project to produce Supplementary Planning Guidance for the whole or part of each Site of Special Significance;
- Survey the Areas of Biodiversity Importance other than the Foreshore and those Areas associated with a Site of Special Significance and identify any new Areas of Biodiversity Importance;
- Planning Service to liaise with Guernsey Water to review the design of new development to help ensure that development does not further reduce the capacity of the drainage systems to deal with climate change; and,
- Development & Planning Authority to liaise with the Committee *for the* Environment & Infrastructure at an officer and political level to promote the use of renewable energy equipment and infrastructure in accordance with Policy GP9 and IP1 as part of development of the Energy Policy.

Construction Waste

Introduction

The Strategic Land Use Plan (SLUP) emphasises the importance of sustainable development, climate change mitigation, waste mitigation and sustainability in design and construction. This is reflected in linking policies LP1, LP2, LP3 and LP4. These policies are supported by the Solid Waste Strategy which was adopted by the States in 2012. The draft Inert Waste Strategy was considered by the States in December 2017. Since then progress has been made, with the objective of effectively managing inert waste, focusing on identifying a future inert waste management facility.

The policies of the Island Development Plan (IDP) support the policy direction of sustainability and climate change mitigation as directed by the SLUP. Plan Objective 1 of the IDP sets out the importance of achieving and promoting sustainable development by requiring development to make the most effective and efficient use of land and resources whilst meeting the strategic objectives of the SLUP.

Policy GP9: Sustainable Development of the IDP supports Plan Objective 1 and promotes the provision of sustainable development. Developments, including new and refurbishment, extension and alteration of existing buildings will be supported where it has been demonstrated that the design of the development is sustainable, including the form of construction, orientation and materials used; also Policy GP8 expects all developments, including commercial uses and multiple new dwellings to be designed in such a way that they provide adequate individual or communal areas for storage of refuse and recyclable materials. The development must also not have unacceptable impacts on the amenities of neighbouring properties or Conservation Areas, Protected Buildings or Protected Monuments. Policy GP9 also sets out when a Site Waste Management Plan is required. These requirements are also contained within Policies MC2, LC2, OC1, GP13, GP16(A) and GP16(B).

The IDP encourages the consideration of the reduction of construction waste at the earliest stages of the design process and throughout the pre-construction and construction phases of development through a requirement for the submission of a Site Waste Management Plan with planning applications for certain development. These are the demolition and rebuilding of dwellings on a one for one basis, or the demolition and rebuild of redundant buildings or dwellings which have planning permission to be subdivided or where development is for 5 or more dwellings or for any development of a minimum of 1,000 square metres of floor area.

A Site Waste Management Plan Planning Advice Note was published in June 2018. It is available here: https://www.gov.gg/planning_building_permissions. This Advice Note was produced by the Planning Service, and included consultation with the Construction Industry Forum and relevant States' Committees. This guidance document has been created to provide detailed advice on producing a Site Waste Management Plan, and contains templates and helpful information to aid the process, further setting out the importance of managing construction waste, how to reduce waste and details the information that should

be submitted to the Authority. This includes submitting a Site Waste Management Plan with a planning application and further information required thereafter.

It is important to monitor construction waste to be able to gauge the effectiveness of the IDP policies in encouraging and requiring sustainable forms of design and construction and to inform the policy requirements for waste infrastructure provision. The outcomes of the Site Waste Management Plans will provide very useful data and information for the monitoring of the Solid Waste Strategy and the Inert Waste Strategy to identify the types of construction waste, what happens to it, what barriers there may be to waste minimisation, reuse or recycling and to inform the requirements for future waste disposal through supporting the Solid Waste Strategy and the Inert Waste Strategy.

The Committee *for the* Environment & Infrastructure (C*f*E&I) has provided data (see Appendix 1) on the annual levels of inert waste disposed of and used for land reclamation and inert material which is recycled. The total level of inert waste is trending downwards.

Planning Permissions and Site Waste Management Plans

In 2018 there were 50 planning permissions for residential development that required a Site Waste Management Plan as part of a planning application submission. There were 96 planning permissions for new dwellings[1] in 2018, meaning that approximately 50% of all of these permissions were required to submit a Site Waste Management Plan.

Comparing this data to that of 2017; there were 28 planning permissions for residential development that required a Site Waste Management Plan, which totalled 37% of all permissions for new dwellings in 2017. This is a positive increase in the percentage of residential developments requiring the submission of a Site Waste Management Plan. However, the thresholds for a Site Waste Management Plan being required need to continue to be monitored to ensure that waste is being reduced and that the policies are supporting sustainable development.

There were no planning permissions for buildings over 1,000m^2 that required a Site Waste Management Plan. There was 1 Site Waste Management Plan, for the redevelopment of a redundant building for office use and related car park. This was the only Site Waste Management Plan submitted for a non-residential use. In 2017 the only planning permissions requiring a waste plan were residential. The AMR 2017 recommended that the number developments falling under the 1,000m^2 threshold be monitored, to ensure that this is set at the correct level.

There were 28 planning permissions for office, industry and storage uses in 2018, of this there were 4 permissions with a floorplate over the 1000m^2 threshold or just below – see Figure 1 below. Except the 1 permission requiring a waste plan, mentioned above, the 3 remaining planning permissions were for a change of use across industrial/storage/office uses, for which Site Waste Management Plans would not be required. Of the other 24 planning permissions that were not required to submit a Site Waste Management Plan because the floorplate was below the 1000m^2 threshold, 3 involved demolition. 2 of these

[1] Including redevelopment on a one for one basis, subdivision and redevelopment.

did not submit a Site Waste Management Plan, whereas 1 planning permission was for the redevelopment of a storage site to residential, fulfilling the criteria for residential development that requires a Site Waste Management Plan. Further monitoring of this indicator is required to ensure that the 1,000m^2 threshold is delivering the objectives of the IDP and the SLUP.

The Authority must ensure that the thresholds for developments requiring Site Waste Management Plans are set at an appropriate level in order to capture the developments that involve demolition and therefore result in inert waste arising from the development. The extent of inert waste should be captured in order to discover any barriers to waste minimisation and reduce the quantity of materials that are sent to landfill.

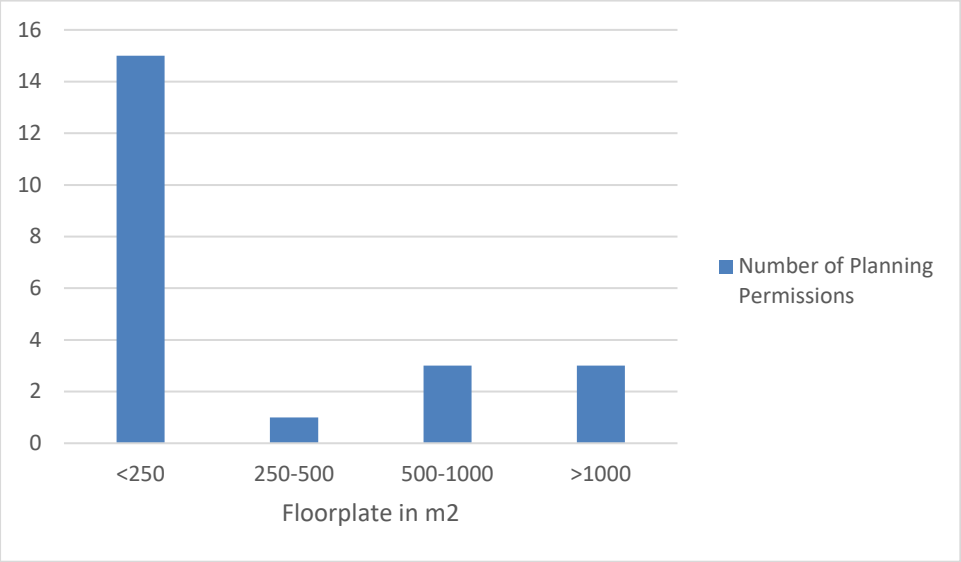


Figure 1: Floorplate sizes of office, industry and storage planning permissions, 2018

2017 AMR Action Update – the 2017 AMR included an action for monitoring of the type and scale of developments requiring a Site Waste Management Plan to ensure the threshold is set at an appropriate level. This action is carried forward.

The table below, Figure 2, shows the type of developments that submitted Site Waste Management Plans. The majority of applications were for one for one replacement dwellings, which involve the demolition and redevelopment of a site, often producing a large amount of waste. Due to the demolition involved with one for one replacement dwellings, it is important that this information is monitored.

Type of Application	Number of Applications	Proportion of Applications
1 for 1	35	70%
Demolition and redevelopment of a redundant building	2	4%
Five or more dwellings	10	20%
Subdivision	3	6%

Figure 2: Types of planning application requiring a Site Waste Management Plan

The requirement for producing Site Waste Management Plans does not include planning applications for the construction of a single dwelling (that is not a 1-for-1 replacement) or for residential developments for 2-4 new units. There were 10 planning permissions granted in 2018 for these types of developments, representing approximately 10% of planning applications for new dwellings in 2018. 2 of the planning permissions for residential developments for 2-4 new units involved the demolition of buildings, and one of the planning permissions for the construction of a new dwelling required the demolition of buildings. The data regarding waste for those developments was not captured because a Site Waste Management Plan was not required. Over time and particularly because of lot of development on Guernsey is small scale, this could result in a significant proportion of data regarding construction waste not being captured. Residential development is predominantly small scale. In 2018, 91% of planning applications for new residential units, replacement dwellings on a 1-for-1 basis and change of use were for developments resulting in a net increase of 0-5 dwellings. Feedback for the AMR from within the Planning Service indicated that schemes for 1-4 dwellings often have the potential to generate a significant amount of waste.

Therefore further consideration will be given to the type of developments requiring to submit a Site Waste Management Plan in consultation with stakeholders and relevant Committees. Further monitoring is required of the number of proposals for single new build dwellings and residential developments for 2-4 new units and the type of development to inform this.

INDICATOR – proportion of planning applications for residential development requiring a Site Waste Management Plan		
Plan Objective		Plan Objective 1: Make the most effective and efficient use of land and natural resources.
Target		Increase sustainability of developments by minimising construction waste.
Outcome	2018	50% of planning applications involving new dwellings/ replacement dwellings/subdivision/redevelopment were required to submit a Site Waste Management Plan.
	2017	37% of planning applications involving new dwellings/replacement dwellings/subdivision/redevelopment were required to submit a Site Waste Management Plan.
Target met?		Further monitoring is required to determine this.

Comments (including any risks to delivery)	This percentage is higher than 2017 (37%), more data needs to be gathered and this number needs to be monitored to ensure that Objective 1 is being met.
Action	2017 AMR Action Update - the 2017 AMR included an action for monitoring of the proportion of residential planning applications requiring the submission of a Site Waste Management Plan to ensure the threshold is set at an appropriate level. This action is carried forward.

Conditions

As Site Waste Management Plans are intended to be living documents, the information should be recorded continuously throughout a project. In order to ensure this information is captured there are often conditions attached to planning permissions when a Site Waste Management Plan is required. The information required is proportionate and there are a number of different conditions which are applied on a case by case basis.

In total, 75% of planning applications that received permission in 2018 and required a Site Waste Management Plan, had conditions attached to the planning permission. This ensures that information is captured prior to the commencement of the development, prior to occupation of the development or within three months post completion.

All of the conditions regarding construction waste that are attached to planning permissions, require the submission of further information to the Authority regarding their Site Waste Management Plan. In total, 22% of these planning permissions require the submission of further information prior to the commencement of works on site and 92% of planning permissions require the submission of further information prior to occupation of the site.

To date and because Site Waste Management Plans are only just beginning to be implemented, the Authority has received only 2 submissions of Site Waste Management Plans prior to the commencement of work on site. There is therefore insufficient data currently available for any meaningful analysis as part of this AMR. Any additional information regarding managing waste will be recorded and it is hoped that over time, there will be a large enough quantity of data to monitor the effectiveness of conditions relating to Site Waste Management Plans. The States' Trading Supervisory Board in its response to the consultation for the AMR comment that the "Guernsey Waste Team work closely with the Planning Service and will provide support with the data analysis for Site Waste Management Plans". The discharge of conditions will also be monitored.

The information and data from Site Waste Management Plans will be shared with the C*f*E&I and STSB on a regular basis and correspondence with the C*f*E&I and STSB will continue annually in order to capture and analyse any arising trends. This will allow any barriers to waste reduction, recycling and the reuse of materials to be highlighted, which can then be addressed.

2017 AMR Action Update - The 2017 AMR included an action for monitoring of post completion submissions and analysis against baseline figures to determine which materials

are successfully reused, recycled and minimised and to identify any barriers. This action is carried forward.

Quality of Submissions

The quality of submissions of Site Waste Management Plans received with a planning application is varied, with some applications containing a generic paragraph about reducing waste, with other applications providing detailed, site specific accounts of how waste will be minimised. Since the publication of the Site Waste Management Plans Advice Note, there have been a number of submissions that have either used the template forms or created their own. These submissions are noticeably higher quality than those submissions that do not incorporate the information within the guidance.

The quality of submissions needs to be standardised and whilst the publication of the Advice Note has resulted in the improvement of submissions generally, there are still submissions that are not up to standard. Whilst Site Waste Management Plans are intended to be proportionate to the type of development proposed, when considering the submissions so far, there has been significant variation in the level of information required for different scales of development. Internal guidance should be produced to ensure that Development Control Officers have clear advice on the information that needs to be submitted. The Advice Note will then be reviewed to determine if further information regarding the scale of developments and the type of information expected is required.

Action - Produce internal guidance for Development Control Officers to outline the information that is expected to be provided within a Site Waste Management Plan.

Action - Secondary review of the Site Waste Management Plans Planning Advice Note following the completion of internal guidance.

Site Waste Management Plans - guidance

The Planning Advice Note on Site Waste Management Plans was published in June 2018. Upon the publication of the guidance, the Authority committed to reviewing the Advice Note after 6 months. As part of the stakeholder engagement for the AMR 2018, local agents were asked to provide feedback on preparing Site Waste Management Plans and the Advice Note. No comments were received, therefore the guidance does not need to be updated at this time. However, the Authority will continue to monitor the effectiveness of the guidance and continue to seek feedback from stakeholders.

Action - continue to monitor the effectiveness of the Site Waste Management Plans Planning Advice Note and continue to seek feedback from stakeholders.

In regards to Site Waste Management Plans, STSB said the following: “Site Waste Management Plans have now been introduced to the construction industry and promoted via the Development & Planning Authority, Guernsey Waste officers, the Construction Industry Forum (CIF) and the newly established CIF Waste Sub-Group. As this initiative gains further momentum, it is anticipated that more construction and demolition waste will be recycled on site and through forward planning, minimised.

2017 AMR Action Update - The 2017 AMR included an action for continued regular engagement with the Construction Industry Forum in regards to Site Waste Management Plans in order to monitor their effectiveness in delivering the requirements of the Island Development Plan policies. This continues to be relevant and the action is carried forward.

Update from the Committee *for the* Environment & Infrastructure and the States' Trading Supervisory Board

The Committee *for the* Environment & Infrastructure (C*f*E&I) and the States' Trading and Supervisory Board (STSB) have responded to consultation as part of the AMR process on Inert Waste Recycling in 2018 (see Appendix 1).

Waste Strategy Update

Within letters from both C*f*E&I and STSB, it was noted that the waste strategy is nearing some of the final stages of the key infrastructure and services implementation. The responses noted that the new collections of waste and recycling were introduced in September 2018 and that early indications show that recycling levels have increased significantly since the introduction of the new collection system.

The waste transfer station (WTS) located on reclaimed land at the Longue Hougue site is now completed and operational. Work to improve recycling and waste management in States of Guernsey premises and in the commercial sector is on Guernsey Waste's future business agenda.

Inert Waste Update

STSB and C*f*E&I both state:

"The draft Inert Waste Strategy was considered by the States of Deliberation in December 2017. Since then, the Inert Waste Project has been working on a number of work streams to progress the effective management of Inert Waste, with a primary focus on identifying a future inert waste management facility.

A future land reclamation site at 'Longue Hougue South' is currently the 'preferred way forward' for the purposes of providing a replacement Inert Waste facility, when the current facility at Longue Hougue reaches the end of its operational life. Royal Haskoning were commissioned in October 2018 to undertake an Environmental Impact Assessment on a site located south of the current Longue Hougue facility. The project is progressing through the design and analysis phase to develop an Outline Business Case for consideration and ultimately to seek planning and political approvals for any agreed option/solution.

The potential option, currently that of Longue Hougue South, would require the preparation and approval of a Local Planning Brief. In preparation of this planning policy document, my Board [STSB] ask that the DPA consider a full range of future uses on reclaimed land be allowed for, from open land, to Industrial, to residential. This will enable better assessment of potential future subsequent benefits of such a project". There will be an opportunity for both Committees to input in to the production of a Local Planning Brief for an inert waste facility through pre-publication consultation. A range of factors would determine the most appropriate future use(s) of the site. For reclaimed land however, IDP Polices relating to

Main Centre Outer Areas as well as S5: Development of Strategic Importance and S6: Strategic Opportunity Sites would allow for a wide range of future uses.

Summary

The number of submissions of Site Waste Management Plans has increased since 2017 and the quality of submissions has generally improved since the publication of the Planning Advice Note. However internal guidance is needed to ensure that the submissions are proportionate to the development and that the type of information that is recorded is appropriate.

There have been 2 submissions of additional information on Site Waste Management Plans, which does not provide a large enough quantity to analyse. This information will continue to be captured and monitored in the future. This relates to planning conditions which are attached to planning permissions to ensure that the Site Waste Management Plans are updated throughout a project and that information is submitted to the Planning Service.

The planning policies regarding Site Waste Management Plans are being implemented and information is being captured. At this time, the strategic objectives of sustainable development are being implemented through the requirements for Site Waste Management Plans, however, more information from a development from start to finish is needed in order to assess whether construction waste is in line with industry standard baseline targets.

Summary of monitoring requirements

- Continued monitoring of the type and scale of developments requiring a Site Waste Management Plan to ensure the threshold is at an appropriate level;
- Continue monitoring of the proportion of residential planning applications requiring the submission of a Site Waste Management Plan to ensure the threshold is set at an appropriate level;
- Monitoring of post completion submissions and analysis against baseline figures to determine which materials are successfully reused, recycled and minimised and to identify any barriers; and,
- Continue to monitor the effectiveness of the Site Waste Management Plans Planning Advice Note and continue to seek feedback from stakeholders.

Summary of action required

- Provide internal guidance for Development Control Officers to outline the information that is expected to be provided within a Site Waste Management Plan;
- Secondary review of the Site Waste Management Plans Planning Advice Note following the completion of internal guidance; and,
- Continued regular engagement with the Construction Industry Forum in regards to Site Waste Management Plans in order to monitor their effectiveness in delivering the requirements of the Island Development Plan policies.

Built Heritage and New Development

Introduction

The Future Guernsey Plan recognises the importance of the heritage and environment of Guernsey having, as part of the 20 year vision, the aim of providing a safe and inclusive community which nurtures its unique heritage and environment.

The Strategic Land Use Plan (SLUP) recognises that there will be a tension between absolute protection of our built environment and the need to accommodate modern, fit for purpose buildings that are capable of meeting our economic and social needs in the future. It highlights that, particularly in St Peter Port, it is important to protect what sets it apart from other towns whilst at the same time making provision for investment so that Guernsey keeps pace with other jurisdictions in terms of quality of accommodation and services. This is also important to several of the themes and priorities set out in the Future Guernsey Plan and is reflected in the core objectives of the SLUP and policies LP4, LP6, LP8 and LP9.

The SLUP states that policies relating to the built heritage should be informed by an understanding of its character and quality and their relative value so that a proportionate approach can be taken to the level of protection afforded and to the reasonable management of change.

The SLUP states that respecting the quality of the physical environment and local heritage and seeking a good standard of design of new development is important in managing physical change. Good building design can contribute to the creation of a cohesive built environment that enhances the experience of living, working or visiting the Island and thereby contributes to achieving the priorities of the States as set out in the Future Guernsey Plan.

The SLUP requires Development Plan policies to promote quality and sustainability in new development and to enable enhancement of the built environment where appropriate (SLP33, LP1 and LP4), whilst improving the energy efficiency and carbon efficiency of new buildings (LP2) and ensuring new and existing building stock is more resilient to climate change impacts (LP3).

The relevant Island Development Plan (IDP) policies include:

- GP4 Conservation Areas;
- GP5 Protected Buildings;
- GP6 Protected Monuments;
- GP8 Design; and,
- GP9 Sustainable Development.

These policies collectively aim to conserve and enhance the high quality of Guernsey's built environment while appropriately balancing the need to provide adequate land for legitimate development requirements in accordance with the Principal Aim of the IDP and towards fulfilling IDP Plan Objective 1: make the most effective and efficient use of land and natural resources; Plan Objective 2: Managing the Built and Natural Environment; and Plan

Objective 3: Supporting a Thriving Economy. In seeking a proportionate approach to levels of protection as required by the SLUP, the IDP acknowledges that there are areas, buildings etc. subject to Special Controls (Sites of Special Significance, Protected Monuments, Protected Buildings, Conservation Areas) that are afforded a high level of protection under the Planning Law and Ordinances and where the policy tests will be greater but outside of which policies will allow for greater change to meet the social and economic objectives of the States.

The policies of the IDP also seek to ensure the provision of amenities associated with new development is appropriate to the specific circumstances with respect to the health and well-being of building occupants and neighbours.

Conservation Areas

The IDP designates 26 Conservation Areas designated on the basis of the outstanding qualities of their special architectural and historic interest. One Conservation Area (Delancey) was added due to a successful amendment[28] placed during the States' debate of the IDP – see Figure 1. IDP Annex VII provides a Summary of the Special Interest of each Conservation Area as well as the reason(s) for its designation. In recognising the proportionate approach required by the SLUP the designated Conservation Areas are those which have a distinct special character and architectural and historic interest and where very few features or buildings detract from their overall collective value. Three Conservation Areas (St Peter Port, Delancey and The Bridge) are substantially within the Main Centre and Main Centre Outer Area boundaries. Three Conservation Areas (St Martin Church and Sausmarez Manor, Forest Church and St Pierre Du Bois Church) are partially within the Local Centre boundaries.

The IDP Policy GP4: Conservation Areas gives general support for development in Conservation Areas where it conserves, and where possible enhances, the special character or historic interest and appearance of the particular Conservation Area.

[28] Billet D'Etat XXV & XXVII P.2016/25 Amdt 6 Proposed by Deputy LS Trott, Seconded by Deputy GA St Pier

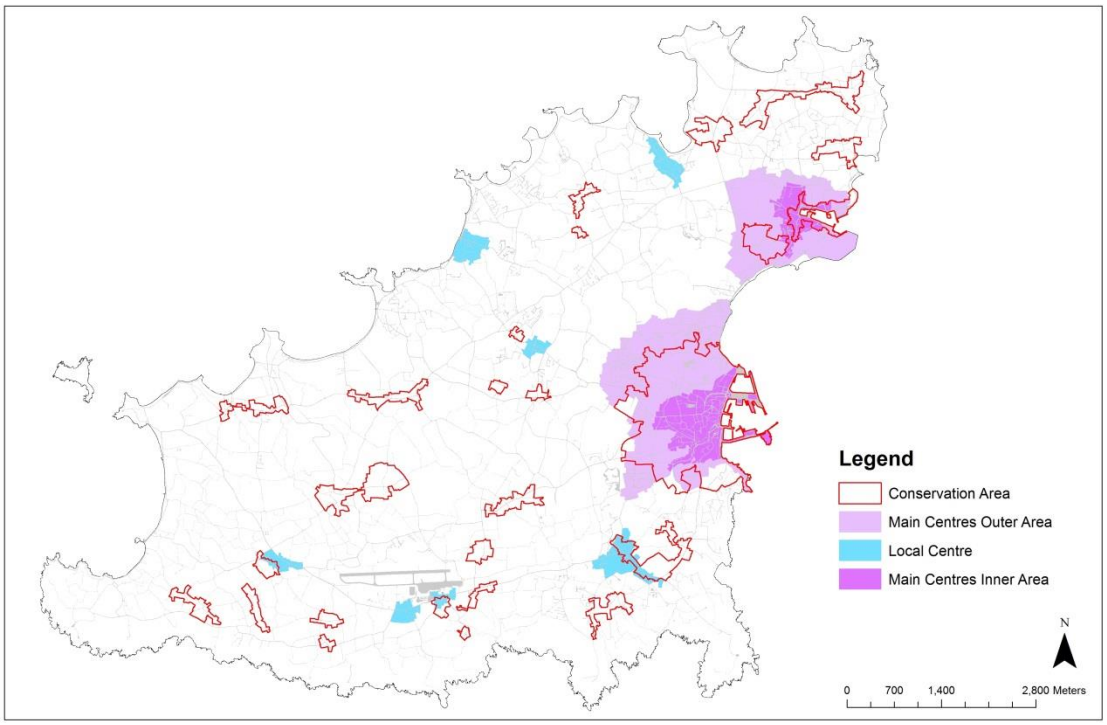


Figure 1: Conservation Areas

Conservation Area Character Appraisals

Notwithstanding the information about each Conservation Area in IDP Annex VII, IDP paragraph 19.5.6 states that the Authority will prepare a Conservation Area Character Appraisal (CACA) for each Conservation Area. These documents will help land or building owners, as well as developers and their agents, understand what is special about a particular Conservation Area so that development can be designed to sustain the special architectural or historic interest or minimise harm to that Conservation Area.

Figure 2 below summarises the significant development pressure in Conservation Areas which has emerged since the IDP was approved.

2017	2018
The States has identified St Peter Port's Harbour Action Area (HAA) as one of the 23 key priorities (further details provided in the Strategic Development and Infrastructure Report of the AMR).	Progress of SEA/HAA commented on in Strategic Development and Infrastructure thematic Report of the AMR
Les Bas Courtils (Housing Allocation partially within the Delancey Conservation Area)	Development Framework approved in 2018. Pre-application discussions have been on-going. No planning application has been submitted.
Briarwood (windfall site partially within the St Martin's Church and Sausmarez Manor Conservation Area)	Development Framework approved in 2018. Pre-application discussions have been on-going. No planning application has been submitted.

Pointes Rocques (Housing Allocation within the Delancey Conservation Area)	Draft Development Framework progressed. Publication of final Development Framework expected in 2019.
A part outline/part full permission (ref OP/2016/0552 / FULL/2016/0541) was granted in 2016 for Leale's Yard Regeneration Area, which is partially within the Bridge Conservation Area.	Reserved Matters have not been submitted. No work has commenced. Outline Planning Permission ref OP/2016/0552 expired in 2018. The full permission (ref FULL/2016/0541) will lapse in August 2019 if works do not commence. A project to produce a Development Framework for this Regeneration Area will be commenced by the Authority in 2019, to be produced in co-operation with the major landowner and other relevant Committees subject to the resource / funding options.
	Draft Development Framework for English and Guernsey Arms published in 2018, which is within the Bridge Conservation Area. Framework approved in March 2019.

Figure 2: Summary of significant development pressure in Conservation Areas

Production of CACA for the St Peter Port HAA and the character areas of St Peter Port where there are Regeneration Areas will assist in the production of Local Planning Briefs or other local development strategies and Development Frameworks.

INDICATOR – Number of Conservation Area Character Appraisals	
Plan Objective	Plan Objective 2: Manage the Built and natural Environment; Plan Objective 3: Support a Thriving Economy; Plan Objective 4: Support a Healthy and Inclusive Society.
Target	Target for production of CACAs will be established in the Project Plan (see below) and included in future AMRs once the Project Plan has been approved.
Outcome	More detailed understanding of the special architectural and historic interest of the specific Conservation Area so that development can be managed to preserve and enhance its special architectural and historic interest. Baseline to measure change. Identify opportunities to enhance a Conservation Area.
Target met	Yes.
Comments (including any risks to delivery)	During 2018 a Project Plan for the delivery of all 26 CACA has been prepared. It is anticipated this project will take approx. 4 years to complete. The St Peter Port CACA will be given priority which is scheduled to begin in Q2 2019 and completed at the end of Q1 2020.

	Over 2018 the outline planning permission for Leale's Yard expired. This has increased the priority for The Bridge CACA. It is anticipated that the Bridge CACA will begin in Q2 2020. However, options are being explored to progress the CACA in parallel with the production of a Development Framework for Leale's Yard, which the Authority intends to commence in 2019. This project remains one of the priorities within the Planning Service Business Plan. Risk of delay to the production of a Local Planning Brief or similar plan for St Peter Port HAA pending a CACA of St Peter Port including the character areas of the harbours and St Peter Port. Annex VII of the IDP provides sufficient information to assess planning applications for minor development such as householder proposals.
Action	2017 AMR Action update – the 2017 AMR include an action to complete a Project Plan for Conservation Area Character Appraisals and implement work-steam in accordance with Project Plan. The project plan has been prepared, the remainder of the action is carried forward: Implement work-steam in accordance with Project Plan. Priority will be given to those Conservation Areas where there is likely to be significant development in the short to medium term that will help deliver the social and economic aims of the States of Guernsey: 1. The areas of St Peter Port where there is likely to be significant development – HAA/SEA, Regeneration Areas, Housing Allocations and windfall sites that are large enough to require a Development Framework (expected to start Q2 2018 and completed Q1 2020); 2. The Bridge 3. Delancey Conservation Area; and, 4. St Martin's Church and Sausmarez Manor Conservation Area.

Development that Conserves and, where possible, Enhances a Conservation Area

IDP Policy GP4: Conservation Areas recognises that, in order to meet the social and economic objectives of the States of Guernsey, new development is needed within Conservation Areas and particularly in those Conservation Areas that are also within the Main Centres and Main Centre Outer Areas. The policy seeks to ensure that new development is appropriately designed so as to conserve [i.e. does not harm] and, where possible enhance, the special architectural and/or historic interest of that specific Conservation Area; and to resist the demolition of features within a Conservation Area that

contribute to its character unless the replacement makes an equal or enhanced contribution to the character and appearance of the specific Conservation Area.

Figure 3 below shows the number of planning applications determined in 2017 and 2018 within a Conservation Area, the percentage of applications that were refused and the percentage that were refused on the grounds that they did not comply with Policy GP4.

	Number of Planning Application determined within a Conservation Area	Number and percentage of planning applications refused	Number and percentage of planning application refused on GP4
2018	432	10 (2.3%)	4 (0.9%)
2017	475	13 (2.7%)	2 (0.4%)

Figure 3: Monitoring of determination of planning and refusals within Conservation Areas

In particular, a refused planning application (ref FULL/2016/2611) was for a relatively large amount of new non-residential development at the Former Ruette Braye Motors Les Merriennes in St Martin's. In 2018 an appeal to this refusal was submitted, but was withdrawn in April 2019.

Over 2017 and 2018, approximately 50% of planning applications approved in Conservation Areas were for relatively minor works (such as dormer windows, partial demolition of boundary walls, replacement windows/doors, alterations for utility providers, building plant). Based on the evidence available it is not possible to establish if such minor alterations have had a cumulative negative effect, on the interest of a particular Conservation Area. Therefore such works should be monitored in order to establish if the character and appearance of a particular Conservation Area has been eroded over time. This can be achieve through the production of the CACA.

Summary

Based on the evidence available Policy GP4 and Annex VII appear to be successful in allowing new development to occur in Conservation Areas as evidence by the vast majority of planning applications that have been approved, whilst applying the higher level of consideration to the effects on the special character and architectural and historic interest of the particular Conservation Area. The policy allows for the particular character to be considered rather than a blanket approach to all Conservation Areas. Once produced, CACAs will inform the application of Policy GP4 and these assessments can be monitored to determine any changes to character and special interest over time. In particular, the cumulative effect of relatively minor development needs to be monitored to establish if there has been any cumulative harm to the interest of the Conservation Area. The policy does not present any barriers to development in principle and remains relevant.

Action - whilst producing CACA monitor the cumulative effect of minor development on the particular character and appearance of that Conservation Area.

Protected Buildings

Figure 4 below indicates the number of Protected Buildings at the start of each year, as well as a summary of their spatial distribution (also see Figure 5 below).

	Number of Protected Buildings	Number and percentage within Main Centres Inner Areas	Number and percentage within Main Centres Outer Areas	Number and percentage within Local Centres	Number and percentage Outside of the Centres
2018	1619	735 (45.4%)	246 (15.1%)	49 (3.0%)	589 (36.6%)
2017	1611	724 (44.9%)	247 (15.3%)	51 (3.2%)	589 (36.6%)

Figure 4: Monitoring of number of Protected Buildings

Therefore, 1030 (63.6%) of Protected Buildings are located in areas where the IDP policies allow for development in accordance with the spatial strategy set by the SLUP. This represents opportunities that focus development investment into these areas and Protected Buildings, but equally offers challenges to ensure development is in a manner that, as far as possible, sustains the special interest of the Protected Buildings.

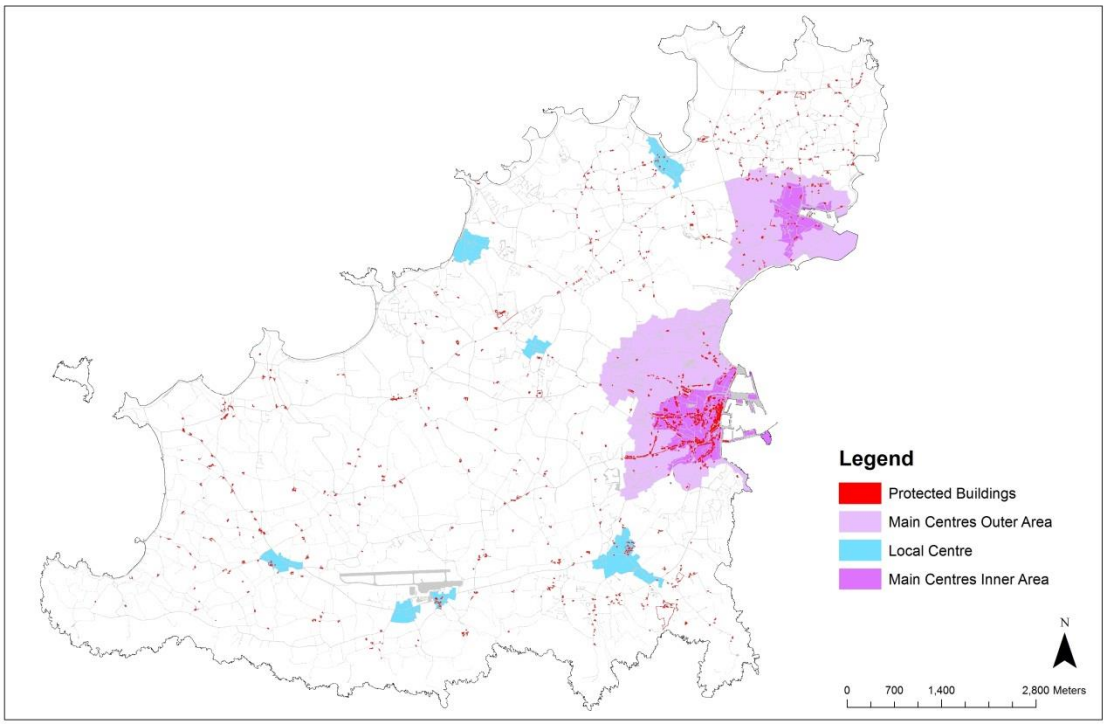


Figure 5: Protected Buildings

Policy GP5: Protected Buildings provides for and positively supports the appropriate development and managed change of Protected Buildings in order to secure, as far as possible, the particular special interest of a Protected Building whilst at the same time taking into consideration the requirement to meet the social and economic aims of the States of Guernsey, the reasonable aspirations of property owners and the contribution the development might have to the vitality of a Main Centre.

Policy GP5 supports development where it does not have an adverse effect on the overall special interest of a building. However, development is often needed to sustain the overall

special interest of a Protected Building and in some cases, it may be necessary for some harmful work to be undertaken in order that the overall special interest of the building or the part of the building is sustained. Therefore, where development has an adverse effect, Policy GP5 requires a proportionate approach to be taken which balances the degree of effect on the overall special interest of the building, against the reasonable aspirations of the building owner as well as any benefits to the social and economic, aims of the States of Guernsey, and where appropriate, the contribution the development might make to the vitality of a Main Centre.

Feedback from Stakeholders in response to consultation on the AMR has not raised any substantial issues with Policy GP5. However, a response from Guernsey Society of Architects has raised a more general issue with how the planning process can work better once construction has begun in order to reduce or avoid delays. This is a operational matter rather than a comment on Policy GP5.

Figure 6 below indicates the number of planning applications determined for development to a Protected Building, the percentage of applications that were refused and the percentage that were refused on the grounds that they did not comply with Policy GP5.

	Number of Planning Application determined for development to a Protected Building	Number and percentage of planning applications refused for development to a Protected Building	Number and percentage of planning application refused on GP5
2018	203	2 (0.9%)	2 (0.5%)
2017	237	2 (1.2%)	2 (1.2%)

Figure 6: Planning applications determined for development to a Protected Building

Harmful Work to a Protected Building

Policy GP5 allows for the principle of harmful work to be carried out to a Protected Building, which depending on the particular special interest of the Protected Building, might range from relatively minor development to partial demolition or even razing the building to the ground. This might occur, for example, because the harm to the special interest of the Protected Building is outweighed by the contribution the development makes to the social and economic aims of the States of Guernsey, and/or the reasonable and legitimate aspirations of the property owner and/or the contribution the development will make to the vitality of a Main Centre. However, the aim of Policy GP5 and the Planning Law is that, as far as possible, the overall special interest of a Protected Building should be protected. The Policy will, therefore, be monitored to determine how often the policy results in work so harmful that the special interest of a building is permanently lost to such an extent that the building is no longer worthy of Protected Building status.

During 2018 the DPA's "Review of the Protected Buildings List" was progressed. Additionally, the DPA has a duty under S33 of the Planning Law to prepare, maintain and keep under review the protected buildings list. As part of the project and on-going duty:

- 24 buildings were added to the list;
- 4 buildings were removed from the list; and,

- 3 buildings had their Notice amended to change the extent of protection.

The above project and decisions need to be taken into account when monitoring this Policy. None of the above decisions to remove a building from the protected buildings list was as a result of planning permission being granted since the IDP was approved in November 2016.

At the end of 2018 there were 1639 Protected Buildings.

During 2018 a number of planning applications were approved for alterations to the Market Buildings, Market Street, St Peter Port (PB1605). Planning Application FULL/2018/0075 to "install external food and drink kiosk with glazed canopy" was approved with a condition to limit the use to 3 years in order to ensure the use does not become permanently established without the submission of a further planning application supported by evidence of any positive contribution made to the vitality and viability of the Main Centre and the quality and functionality of the public realm. This condition of the planning application is worthy of monitoring.

INDICATOR – Number of Protected Buildings removed from the list because of harmful work being implemented	
Plan Objective	Plan Objective 2: Manage the Built and natural Environment; Plan Objective 3: Support a Thriving Economy.
Target	Monitor the extent of loss of Protected Buildings as a result of a planning permission being implemented for works that would not sustain its overall special interest (e.g. partial demolition or demolition).
Outcome	As far as possible sustain the special interest of a Protected Building. Baseline to measure change.
Baseline	Number of Protected Buildings as of 01.01.17 1611. Number of Protected Building as of 01.01.18 1619 Number of protected Buildings as of 31.12.18 1639
Target met	Yes. No Protected Buildings were removed or their Notice amended as a result of a planning application being implemented.
Comments (including any risks to delivery)	
Action	2017 AMR Action Update – the 2017 AMR included an action to monitor decisions on planning applications for Protected Buildings in order to establish if any protected Buildings are removed from the list as a result of planning permission being implemented. This action is carried forward.

<u>Vacant Protected Buildings and Protected Buildings at Risk.</u>
IDP paragraph 19.6.2 recognises that without investment and adaptation there is a danger that Protected Buildings will become obsolete and unable to be used for their intended purpose, fall into disrepair and, potentially be permanently lost. In order to ensure

Protected Buildings are not permanently lost, Policy GP5 accepts that some harmful development may be necessary in order to sustain the overall special interest of a Protected Building.

Those buildings that are falling into disrepair, or are close to falling into disrepair have been recorded as a 'Protected Buildings at Risk Register' and in some cases those buildings are also vacant.

There are many reasons why the special interest of a Protected Building may be at risk and/or vacant, some of which relate to matters that cannot be influenced by Planning Law and/or IDP Policies, such as the personal circumstances of the building owner(s). Buildings at risk that are also vacant are of particular concern because they will deteriorate more rapidly; for example there is no heating or nobody present on a daily basis to notice obvious defects that need urgent repair such a leaking rainwater pipes or gutters.

Section 7 of the Land Planning and Development (Special Controls) Ordinance, 2007 provides for the Authority to issue a Preservation Notice to specify works urgently required to preserve, protect and/or prevent the deterioration of the protected building. However, in all cases the Authority will seek to avoid the issue of a preservation Notice by first writing to the owner(s) in order to work with them to prevent any further deterioration of the protected building and thus avoid issuing Preservation Notice.

Over 2018 all Protected Buildings were subject to a visual inspection to determine their condition and occupancy. The "Buildings at Risk Register" is therefore up to date and summarised in Figure 7 below.

	Buildings at Risk (very poor condition)			Protected Buildings in poor condition		
	Vacant	Part or fully occupied	Total (% of total number of protected buildings)	Vacant	Part or fully occupied	Total (% of total number of protected buildings)
2018	11	4	15 (0.9%)	30	122	152 (9.3%)
2017	7	22	29 (1.8%)	Information not available		

Figure 7: Protected Buildings at Risk and Protected Buildings in Poor Condition
Total Number of Protected Buildings: 2018 – 1619; 2017 - 1611

Figure 7 above shows the number of protected buildings at risk has reduced from the 2017 figure, but this should be regarded cautiously because the 2017 figure was not based on a comprehensive survey of all protected buildings. Monitoring of Protected Buildings at Risk can progress based on the 2018 baseline. If trends reveal that more Protected Buildings are falling into disrepair and/or are vacant than other buildings, further research could be carried out to understand the underlying reasons. Furthermore the findings of this research might provide evidence to inform the States should they consider there is merit in investigating funding of grants or loans for the preservation or enhancement of Protected Buildings (S36 of the Planning Law).

INDICATOR – Protected Buildings at Risk	
Plan Objective	Plan Objective 2: Manage the Built and natural Environment; Plan Objective 3: Support a Thriving Economy.
Baseline	Number of Protected Buildings at risk. 31-12-18 = 15 01-01-17 = 29
Target	Reduce number of Protected Buildings at risk.
Outcome	The special interest of a Protected Building is, as far as possible, sustained.
Target met	N/A. Although the number of protected buildings at risk appears to have reduced, the 2017 baseline was not based on a comprehensive survey of the condition of all Protected Buildings.
Comments (including any risks to delivery)	Protected Building 903 was added to the Buildings at Risk Register because of a fire. Pre-application discussions are on-going to address the condition of the building.
Action	2017 AMR Action Update – the 2017 AMR included an action to, over 2018, provide a robust baseline by surveying of the overall condition and occupancy of all Protected Buildings. This action is completed. Over 2019 work with owners of Protected Buildings in very poor condition to prevent their further deterioration. Give priority to Protected Buildings that are also vacant.

INDICATOR – Number of Vacant Protected Buildings	
Plan Objective	Plan Objective 2: Manage the Built and Natural Environment; Plan Objective 3: Support a Thriving Economy.
Baseline	Number of vacant Protected Buildings 31-12-18 = 41 01-01-17 = 7.
Target	Reduce number of vacant Protected Buildings.
Outcome	Vacant Protected Buildings are brought back into use. The special interest of a Protected Building is sustained.
Target met	N/A. Although the number of vacant protected buildings appears to have increased, the 2017 baseline was not based on a comprehensive survey of the occupancy of all Protected Buildings.
Comments (including any risks to delivery)	
Action	Over 2019 work with owners of vacant Protected Buildings to bring them back into use where this can be influenced by

	Planning Law/policy. Prioritise Protected Buildings that are also in very poor condition.

INDICATOR – Number of Preservation Notices issued and resolution of Preservation Notices	
Plan Objective	Plan Objective 2: Manage the Built and natural Environment; Plan Objective 3: Support a Thriving Economy.
Baseline	2 Preservation Notices were issued prior to 01.01.2017 when monitoring of this policy commenced, of which 0 are unresolved.
	2018 - 0 Preservation Notices were issued in 2018
	2017 - 0 Preservation Notices were issued
Target	Resolve Preservation Notices.
Outcome	The special interest of a Protected Building is, as far as possible, sustained.
Target met?	Yes. However, 2 Preservation Notices issued prior to 2017 remain unresolved.
Comments (including any risks to delivery)	
Action	Over 2018 provide a robust baseline by surveying the overall condition and occupancy of all Protected Buildings. Action completed. Issue Preservation Notices for Protected Buildings where informal means to improve the condition of the building have not been successful.

Based on the evidence available Policy GP5 appears to be successful in allowing new development to occur to Protected Buildings and their settings as evidence by the vast majority of planning applications that have been approved, whilst applying the higher level of consideration to the effects on the overall special interest of the particular Protected Building. The policy allows for the specific special interest of each Protected Building to be considered and balanced against the reasonable aspirations of the property owner and/or the contribution to the economic and social objectives of the States of Guernsey and/or its contribution to the vitality of a Main Centre.

Further monitoring, against the 2018 baseline of the condition and occupancy of all Protected Buildings, is needed to establish if the policy adequately enables the redevelopment of Protected Buildings at Risk and/or vacancy. This will be achieved by monitoring any reduction of the number of Protected Buildings at Risk and those in very poor condition against the 2018 baseline line.

Protected Monuments

Policy GP6: Protected Monuments supports the appropriate development of Protected Monuments, but gives Protected Monuments a high level of protection from inappropriate

development. Therefore, the policy only supports development which directly affects a Protected Monument or the site on which it is located if it is required for enabling or facilitating access to or enhancing the appreciation of the Protected Monument by the public. This is commensurate with the high level of protection afforded to Protected Monuments in the Planning Law.

Figure 8 below indicates the number of Protected Monuments at the start of each year, as well as a summary of their spatial distribution (also see Figure 9 below).

	Number of Protected Monuments	Number and percentage within Main Centres Inner Area	Number and percentage within Main Centres Outer Area	Number and percentage within Local Centres	Number and percentage Outside of the Centres
2018	318	10 (3.1%)	6 (1.9%)	3 (0.9%)	299 (94%)
2017	319	10 (3.1%)	6 (1.9%)	3 (0.9%)	300 (94%)

Figure 8: Number of Protected Monuments

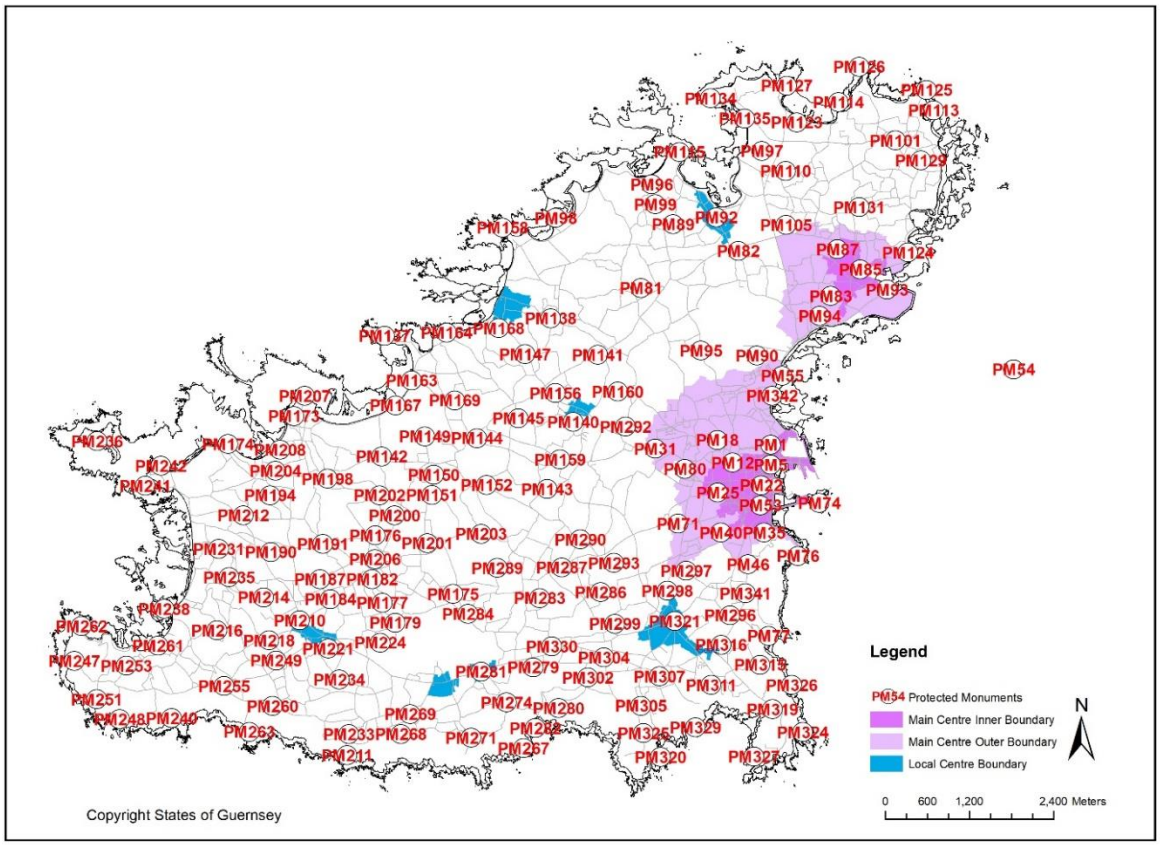


Figure 9: Protected Monuments

In 2018 the Authority published the 'Principles and Criteria for the Selection of Monuments to the Protected Monuments List'. This document provides a transparent and robust means to assess if a Protected Monument has sufficient special interest to be added to the protected monuments list.

During 2018 the Authority reviewed the entry for Protected Monument PM104 (Vale Mill) and decided that it did not meet the Principles and Criteria for Selection of Monuments to the Protected Monuments List. It was, therefore removed from the protected monuments list and added to the protected buildings list.

INDICATOR – Number of Protected Monuments	
Plan Objective	Plan Objective 2: Manage the Built and natural Environment; Plan Objective 3: Support a Thriving Economy.
Target	0 Protected Monuments removed from the list, or the extent of Protected Monuments reduced, as a result of a planning permission being implemented.
Outcome	Wherever possible sustain the special interest of a Protected Monument.
Baseline	Number of Protected Monuments 01/01/18 = 318 01/01/17 = 319
Target met	Yes. No Protected Monuments were removed or their Notice amended to reduce the extent of protection as a result of a planning application being implemented. 1 protected monument (PM104) removed from the list because it did not meet the principles and criteria. Number of Protected Monuments as of 31/12/18 = 318.
Comments (including any risks to delivery)	
Action	Continue to monitor if planning permission has been granted and implemented that would result in that protected being removed from the protected monuments list.

Figure 10 below indicates the number of planning applications determined for development of a Protected Monument, the percentage of applications that were refused and the percentage that were refused on the grounds that they did not comply with Policy GP6.

	Number of Planning Application determined for development to a Protected Monument	Number and percentage of planning applications refused for development to a Protected Monument	Number and percentage of planning application refused on GP6
2018	4	0 (0%)	0 (0%)
2017	6	0 (0%)	0 (0%)

Figure 10: Number of planning applications determined for development of a Protected Monument

The applications within Figure 10 include installation of interpretation boards, external steps and alterations to the Brickfield Kilns, St Andrew. None of these applications are of any special note or worthy of monitoring.

The 2017 AMR noted that planning application FULL/2016/2517 for the change of use and alterations to Fermain Tower (PM77) to create holiday accommodation was worthy of monitoring. This development was completed in 2019.

Policy GP6 is a relatively restrictive policy that reflects the duties and obligations as set out in the Planning Law. Nevertheless, the policy appears to be successful and functioning as intended by allowing development affecting Protected Monuments that is necessary to sustain their special interest and facilitate public access and appreciation.

Qualitative Analysis of the Quality of new Development Based on External Feedback
A number of IDP policies - principally GP8 and GP9, but also IP1, GP13, GP16, GP18 and where appropriate GP4, GP5 and GP6 - work together to promote high quality in new development. This qualitative analysis, therefore considers the quality of the whole of the development rather than individual policies or parts of policies.

IDP Policy GP8: Design expects all new development to achieve high standards of design and, where appropriate, enhances the character of the environment. This will be achieved through a number of measures that ensures development: is of a good architectural design including the inclusion of necessary infrastructure and facilities; makes the effective and efficient use of land; respects the character of the local built environment or open landscape; considers the health and well-being of occupiers and neighbours; provides soft and hard landscaping; is accessible to people of all ages and abilities; and with regard to residential development offers flexible and adaptable accommodation.

IDP Policy GP9: Sustainable Development promotes and enables all new development (i.e. buildings and external spaces) to reduce its overall environmental impact and minimise the use of energy and resources by considering the following factors from the outset of the design process: the location, orientation and appearance of the building; its form of construction and selection of materials (e.g. those with low embodied energy); the use of renewable energy technologies; opportunities to mitigate or adapt to climate change (e.g. risks of flooding and surface water run-off); and for development over a specific size consider how any waste is managed. The outcomes regarding waste from some developments is reported in the Construction Waste thematic report. However, the policy acknowledges the intention is not to repeat the Building Regulations or Guernsey Technical Standards and there may be special considerations if the development affects an area of Special Control such as a Conservation Area, Protected Building or Protected Monument.

In its consultation response STSB highlighted that in October 2018 the Guernsey Water Board endorsed the Guernsey Water Management Strategy, which sets out how the Surface Water management Policy will be delivered. Both these policies are aligned with Policy GP9 in so far that they seek new development to mitigate and adapt to climate change by reducing and managing surface water that discharges into the drainage system. The DQI therefore need to monitor how new development managed surface water as well as any effects this might have on the character of important open land as well as the 5 year Housing land Supply Review if more open space is needed for sustainable drainage to be accommodated in new development.

In order to assess the quality of new development, in future AMRs, development that was approved under the IDP and is completed, over a given size threshold, will be monitored for the quality of design. This will involve a combination of desk-top evidence gathering and on-site surveys. A series of questions and indicators will be used and feedback sought from within the Planning Service and from stakeholders. This provides a consistent means by which the quality of development can be objectively assessed over the period of the IDP. The indicators will include a range of factors, such as: environment; character and distinctiveness; health and well-being; access and movement, and; an assessment of overall quality including quality scoring.

2017 AMR Action Update – the 2017 AMR included an action to, over 2018, draft the methodology and indicators for assessing the quality of new development and consult on these with key stakeholders. They have been drafted and have become known as Design Quality Indicators (DQI). Consultation with key stakeholders is expected to occur in 2020.

Action - Over 2020, the methodology and indicators for assessing the quality of new development will be consulted on with key stakeholders.

The 2017 AMR recognised that it would not be practical to assess the design quality of all development arising from planning approval. Therefore thresholds for the assessment of quality were included in the 2017 AMR. As part of drafting the indicators the thresholds for the assessment of development have been updated for a number of reasons including, co-ordination and alignment with other sections in the AMR, and, in some categories the thresholds were considered to be too low or too high. Therefore thresholds will be established and published alongside the DQI.

Due to this report being written at a time when the DQI have not been agreed it is not possible to conclude whether or not Policies GP8 and GP9 have been successful in delivering their intended purposes. Also, as planning permission is generally valid for three years, development approved under the IDP policies are just beginning to be implemented. Over 2019 it is anticipated that some of the developments approved under the IDP Polices will be completed. Therefore, once the methodology and indicators for assessing the quality of new development have been drafted, consulted on, and agreed the effectiveness of the policies can be monitored and a more complete picture will begin to emerge.

Summary

The SLUP requires a balance between the need to protect Guernsey's special and unique heritage whilst, at the same time, allowing for development of our built environment and the need to accommodate modern, fit for purpose buildings that are capable of meeting our economic and social needs in the future. Policies GP4, GP5, GP6, GP8 and GP9 (which are the subject of this report) have been written to strike this balance.

Based on the number of planning applications approved, Policies GP4, GP5 and GP6 appear to be successful in achieving the balance between allowing for new development and the modernisation of existing and the need to protect what is special about an area, building or monument. However, in reaching the above conclusions, it must be noted that very few

developments have been completed and, therefore, the effect on special interest of the area, building or monument cannot be effectively monitored yet. When planning permissions are implemented their effect on the special interest of the area, building or monument can be monitored and a more complete picture will begin to emerge.

Due to this report being written at a time when DQI have not been agreed and when approvals under IDP policies are just beginning to be implemented generally, it is not possible to conclude whether or not Policies GP8 and GP9 have been successful in delivering their intended purposes. There is no evidence at this time however to suggest that the IDP policies with regard to the built heritage and new development are not delivering the requirements of the SLUP as intended and therefore there is no requirement to amend the policies.

Summary of progress against actions

- Over 2018, the methodology and indicators for assessing the quality of new development has been drafted;
- Project Plan for Conservation Area Character Appraisals has been completed. The project will commence Q2 2019 and will start on producing a CACA for the St Peter Port Conservation Area, which is expected to be completed in Q1 2020;
- Completed survey of the overall condition and occupancy of all Protected Buildings, which provide a baseline for future monitoring;
- Planning Applications for works to Protected Buildings have been monitored in order to establish if any Protected Buildings are removed from the list as a result of planning permission being implemented; and,
- Planning Applications for works to Protected Monuments have been monitored in order to establish if any Protected Monuments have been are removed from the list as a result of planning permission being implemented.

Summary of progress against monitoring requirements

- Monitoring has shown that no Protected Buildings have been removed from the list as a result of a planning permission being implemented; and,
- Monitoring has shown that no Protected Monuments have been removed from the list as a result of a planning permission being implemented.

Summary of monitoring requirements

- Continue to monitor decisions on planning applications for Protected Buildings in order to establish if any Protected Buildings are removed from the list as a result of planning permission being implemented; and,
- Continue to monitor if planning permission has been granted and implemented that would result in that protected being removed from the Protected Monuments list.

Summary of action required

- Implement Conservation Area Character Appraisals work-steam in accordance with Project Plan. Priority will be given to those Conservation Areas where there is likely to be significant development in the short to medium term that will help deliver the social and economic aims of the States of Guernsey:

    1. The areas of St Peter Port where there is likely to be significant development – HAA/SEA, Regeneration Areas, Housing Allocations and windfall sites that are large enough to generate a Development Framework (expected to start Q2 2018 and completed Q1 2020);
    2. The Bridge;
    3. Delancey Conservation Area; and,
    4. St Martin's Church and Sausmarez Manor Conservation Area;

- Whilst producing CACA monitor the cumulative effect of minor development on the particular character and appearance of that Conservation Area;
- Over 2019 work with owners of Protected Buildings is very poor condition to prevent their further deterioration. Give priority to Protected Buildings that are also vacant;
- Over 2019 work with owners of vacant Protected Buildings to bring them back into use. Prioritise Protected Buildings that are also in very poor condition;
- Issue Preservation Notices for Protected Buildings where informal means to improve the condition of the building have not been successful; and,
- Over 2020, the methodology and indicators for assessing the quality of new development will be consulted on with key stakeholders.

Public and Private Parking

Introduction

The Island Development Plan (IDP) has policies for both public and private parking. These are policies IP7: Private and Communal Car Parking and IP8: Public Car Parking.

The strategic context for the IDP policies for parking is set by the Strategic Land Use Plan (SLUP) and the States' approved Guernsey Integrated on Island Transport Strategy (the Integrated Transport Strategy (ITS)).

Policy LP1 in the SLUP states that social wellbeing and maintaining economic development will be realised through the prudent use of natural resources, ensuring the physical and natural environment is conserved and enhanced and reducing, where practicable, the Island's contribution to greenhouse gases. The SLUP further notes that, as the use of motorised vehicles is one of the main contributors to greenhouse gases, policies that lead to a reduction in the need to travel by car should be supported. The SLUP also points out that land use planning has a role to play in influencing travel choice. It identifies working towards achieving 'a safe, secure and accessible environment for all' as a key outcome to work towards.

SLUP Policy SLP37 states that while the appropriate provision of parking in new developments can ensure the economic and social objectives of the States are able to be met, opportunities should be explored to minimise the negative effects of car parking, particularly within the Main Centres.

The SLUP states that convenient access to and within the Main Centres of St Peter Port and St Sampson/Vale is important for those needing to get to work, to shop and to enjoy the facilities they offer. Local reliance on car use has, however, led to the creation of large car parks especially within St Peter Port, where a substantial area of the harbour is dedicated to surface parking, appearing visually unattractive and not representing efficient use of land in a prime location contrary to IDP Plan Objective 1: Make the most effective and efficient use of land and natural resources; Plan Objective 2: Manage the built and natural environment; Plan Objective 3: Support a thriving economy, and; Plan Objective 4: Support a healthy and inclusive society.

<u>Integrated Transport Strategy</u>

These statements are echoed in the Integrated Transport Strategy and the Strategy's vision for travel in Guernsey is, "… to facilitate safe, convenient, accessible and affordable travel options for all the community, which are time and energy efficient, enhance health and the environment and minimise pollution."

The Integrated Transport Strategy also sets out a number of principles to be considered to encourage sustainable transport and accessibility for all. These include maximum (car) parking standards and minimum standards of cycle parking provision in new developments.

The Integrated Transport Strategy notes that a reduction in traffic can be achieved through reduced availability of parking spaces: "This Strategy is principally designed to achieve 'modal shift', in other words to reduce the number of miles travelled in private motor vehicles in favour of walking, cycling and buses by changing from one mode of transport to a better one, and also to make significant progress towards the outcomes encapsulated in the Transport Strategy Vision. The Strategy seeks to do this principally by making the alternatives significantly easier and more attractive than at present".

The IDP policies support the implementation of the Integrated Transport Strategy and facilitate 'modal shift' and convenient access by modes other than the motor car. These include Policy S1: Spatial Policy which aims to concentrate development in the Main and Local Centres which consolidates the majority of social and economic activity in the areas that have the best access to public transport and services and reduces the need to travel by car. This approach helps to reduce the Island's contribution to greenhouse gases. Policy GP8: Design requires proposals to consider how development can be designed to provide the necessary infrastructure and facilities in order to support a range of practicable transport options for reaching the site including facilities that will assist in people being able to commute by bicycle, motorcycle or on foot. Policy IP6: Transport Infrastructure and Support Facilities requires development to be well integrated with the transport network and supports development proposals that encourage a range of travel options to and within the Main Centres and the Main Centre Outer Areas. Policy IP7: Private and Communal Car Parking requires provision of appropriate levels of parking in accordance with the guidance set out in Supplementary Planning Guidance: Parking Standards and Traffic Impact Assessment. This emphasises the importance of designing development to meet the needs of bicycles as well as motor cycles and disabled parking, and sets maximum standards for general car parking in the Main Centres and Main Centre Outer Areas.

Within the resolutions of the Integrated Transport Strategy is a requirement for the Committee *for the* Environment & Infrastructure (C*f*E&I) to report back to the States by December 2018 on the effectiveness of the Strategy. The Committee has stated that "unfortunately, due to competing demands on resources, this has been delayed and it is hoped to complete this policy letter for submission by the middle of this year [2019]". A Policy Letter from the Policy & Resources Committee 'Policy & Resource Plan – 2018 Review and 2019 Updates' will be debated by the States in June 2019. The Policy Letter includes a further update that "the analysis of the effectiveness of measures implemented to provide transport choice and encourage modal shift, and identification of further changes that may be required in order to continue to deliver the Strategy Vision will be submitted in a Policy Letter during quarter 3 of 2019". In the meantime the Committee has provided the Authority with a range of data collated in support of the Policy Letter. The Committee has drawn to the Authority's attention that bus passenger figures have been steadily increasing since 2013. The Committee states that "the upward trend in passenger numbers demonstrates an increase in bus use in the island, most importantly among the local population (as illustrated by the rise in numbers on different routes and in all the months outside of the peak tourist season). With the new fleet and improved services, using the bus has become less polluting and more convenient and accessible, and remains an affordable travel option, especially compared with car use. While there is still capacity for continued improvement, this is a positive achievement of one of the core objectives of the Strategy".

The outcome of the States' debate on that policy letter will need to be considered for any implications for the IDP policies. The findings set out in the policy letter will address modal shift and provide context for IDP monitoring in the future.

The Guernsey Society of Architects in its response to the consultation for the Annual Monitoring Report (AMR) commented that "there needs to be a single reference document identifying the States' Approved Transport Strategy and a States' led comprehensive contemporary review" and that the aspiration to reduce dependency on the car "does not work when the States does not provide practical transport alternatives or appropriate infrastructure". The policy letter will provide a review of the ITS and the C*f*E&I notes that a range of projects have been carried out since the Integrated Transport Strategy was approved in 2014 which support the priorities of the Strategy to increase active travel as an alternative to car use.

The approach of the IDP to support the implementation of the ITS is consistent with the SLUP and until such time as the States approve an alternative ITS there is no need to amend the IDP or the Parking Standards and Traffic Impact Assessment Supplementary Planning Guidance. In its response to the AMR, the C*f*E&I welcomes the support the IDP policies generally give to the ITS, however it would welcome working together more closely, at staff level, to facilitate implementation of individual elements such as travel plans, access plans and measures to encourage active travel.

Action - Development & Planning Authority to liaise with the Committee *for the* Environment & Infrastructure at an officer level to facilitate implementation of individual elements of the Integrated Transport Strategy such as travel plans, access plans and measures to encourage active travel.

The implications for the IDP of any changes to the Integrated on Island Transport Strategy will be reviewed in future AMRs.

2017 AMR Action Update – the 2017 AMR included an action for the Development & Planning Authority to liaise with the Committee *for the* Environment & Infrastructure at an officer and political level to consider the role and effectiveness of the Island Development Plan policies in supporting the aims of the States' Integrated on Island Transport Strategy and to review the implications for the IDP of any changes to the Integrated on Island Transport Strategy. This action continues to be relevant.

Public Parking

IDP Policy IP8: Public Car Parking supports proposals for the provision of new public car parks that would result in a net increase in parking spaces available to the public if it forms part of a major, comprehensive development scheme brought forward through a Local Planning Brief for a Harbour Action Area or a Development Framework for a Regeneration Area or it would enable additional parking spaces to be provided as part of proposals for public car park rationalisation or relocation or redevelopment.

During the debate on the IDP, the States amended Policy IP8[1]. The amendment sought to ease the proposed blanket restriction on increased public car parking within the Main Centres and Main Centre Outer Areas and beyond the Harbour Action Areas and introduced the flexibility to support additional parking spaces to be provided as part of development of Regeneration Areas and as part of proposals for public car park rationalisation or relocation or redevelopment. This could lead to an overall increase in the number of parking spaces through, for example, the provision of a greater number of parking spaces for smaller vehicles and/or motorcycles and providing dedicated areas for electric vehicles or relocating a public car park from an inappropriate place to a more appropriate one but is not of a scale which would undermine the aims and objectives of the ITS. Beyond the Main Centres and Main Centre Outer Areas the provision of public car parking has a reduced impact and, therefore, proposals relating to public parking outside of the Main Centres and Main Centre Outer Areas are assessed against the other relevant IDP policies and the functional need of the development concerned.

The Committee *for* Economic Development (C*f*ED) in its response to the AMR identifies the Seafront Enhancement Area project as an opportunity to address parking issues. In terms of retail the Committee has an objective to "ensure a favourable trading environment for on-island (i.e. physical) retailing activities". This includes increasing access to parking facilities for town users while avoiding potential negative encroachment on other economic activities. The C*f*ED wishes to work with the Authority to look at all potential options for meeting the access and parking aspirations of office users, while also ensuring that this does not adversely affect other economic activities in the areas concerned. The Committee states that "it is considered that the St Peter Port Harbour Action Area, being progressed by the Seafront Enhancement Area Steering Group, provides opportunities to successfully address access, parking and overall physical enhancement issues".

The provision of public parking in St Peter Port Harbour area will be considered as part of the work on the Seafront Enhancement Area project and the associated Local Planning Brief or other local development strategy and this is a cross-committee workstream involving the Policy & Resources Committee, the C*f*ED, the C*f*E&I and the Authority as well as the States Trading & Supervisory Board. This will allow parking provision to be considered and planned in a holistic and comprehensive manner, within the full context of the economic and social contribution the harbour areas will make in the future and the overall access and movement around the Main Centres. The strategy process will enable consideration of the balance between the benefits and adverse effects of development as a whole, including whether development would give rise to a need for additional parking provision.

Policy IP8 also allows for additional public parking spaces to be provided as part of proposals for public car park rationalisation or relocation or redevelopment. There were no planning applications in 2018 to increase the provision of public parking in the Main Centres of Main Centre Outer Areas.

[1] Billet D'Etat XXV & XXVII P.2016/25 Amdt 29 Proposed by Deputy P Ferbrache, Seconded by Deputy J Kuttelwascher

The level of provision of public parking in the Main Centres is shown in Figure 1 below. This is broadly similar to the provision in 2017. Some minor changes have been made to increase the level of provision for small cars and for accessible parking. In 2018, projects relating to public parking included:

- New accessible spaces, Albert Pier;
- Introduction of additional small car parking spaces, Havelet and Salerie car park;
- Introduction of dedicated electric vehicle parking spaces, North Beach car park; and,
- Re alignment of parking spaces, Hospital Lane.

Type of parking	Main Centre / Outer Area	
	St Peter Port	St Sampson's / Vale
Cars - general		
½ hour	74	14
1 hour	111	74
2 hour	830	149
3 hour	270	0
5 hour	166	63
10 hour	1738	144
23 hour	848	197
Accessible	89	6
Other	32	5
TOTAL CARS	**4158**	**652**
Of which are for small cars	158	0
Motorcycle	447	31
Bicycles	200	19

Figure 1: Public car parking provision in Main Centres

INDICATOR – provision of public car parking in the Main Centres and Main Centre Outer Areas		
Plan Objective		Plan Objective 1: Make the most effective and efficient use of land and natural resources. Plan Objective 2: Manage the built and natural environment. Plan Objective 3: Support a thriving economy. Plan Objective 4: Support a healthy and inclusive society.
Target		None.
Outcome	2018	No significant change in the provision of public parking. Some changes as a result of the reallocation of space within existing car parks.
	2017	Baseline position established.
Target met?		n/a
Comments (including any risks to delivery)		The level of provision of public parking will be monitored in subsequent Annual Monitoring Reports.
Action		None.

The Inspectors, during the Planning Inquiry for the IDP, did not find any evidence that the amount of public parking in the Main Centres and Main Centre Outer Areas was below that required for them to function as effective economic and social centres and no further evidence has been forthcoming since the IDP was adopted in 2016.

The use of public parking is monitored with assistance from the C*f*E&I to provide a baseline for any future policy decisions on the supply of public parking and its management.

2017 AMR Action Update – the 2017 AMR included an action for the level of provision and use of public parking in the Main Centres to be monitored in future Annual Monitoring Reports, with assistance from the Committee *for the* Environment & Infrastructure. This action is carried forward.

The 2018 survey took place in August (am and pm counts). This found that in 10 hour spaces (9 locations) there were some free spaces in car parks furthest from the centre of Town – East Arm, Odeon/Monument Gardens – other locations were at or very near capacity – see Figure 2 below. Overall 2.4% of 10 hour spaces were available, down from 6% in 2017. In short-term spaces (3, 2, 1 and half hour) the survey found that overall 15% of short term spaces were available – see Figures 3 and 4 below – the same percentage as 2017.

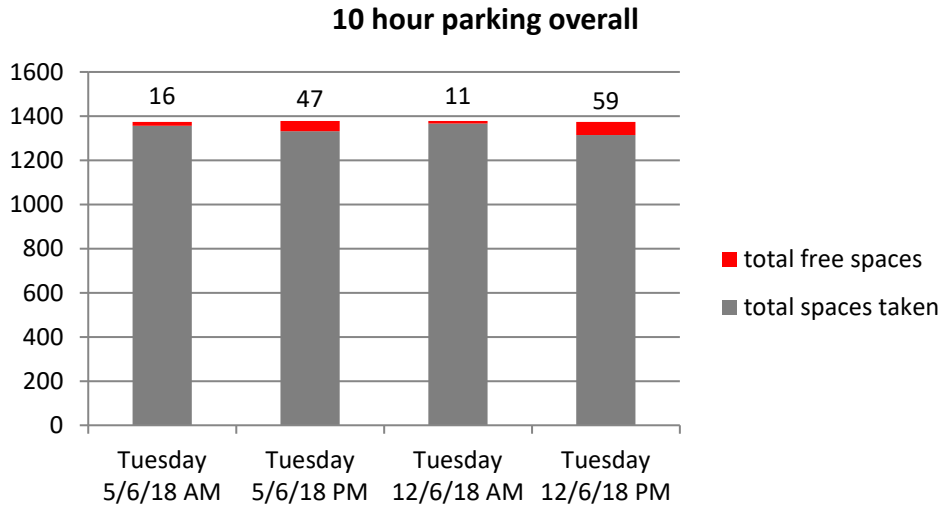


Figure 2: Use of 10 hour car parking spaces

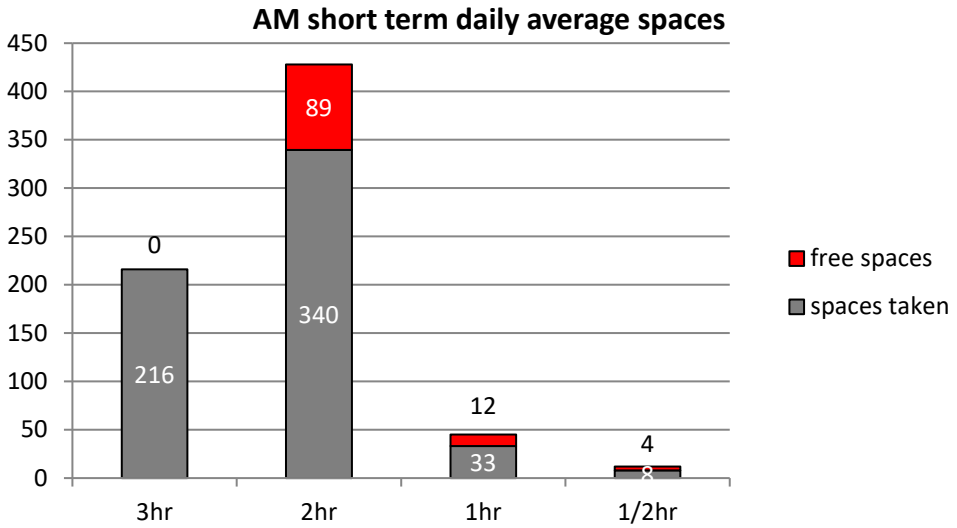


Figure 3: Use of short-term car parking spaces AM

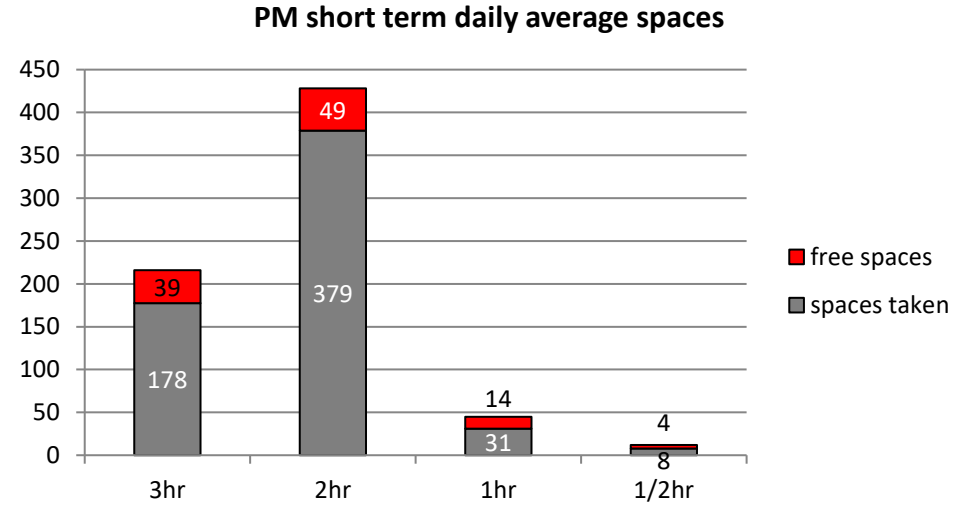


Figure 4: Use of short-term car parking spaces PM

INDICATOR – use of public car parking in the Main Centres and Main Centre Outer Areas		
Plan Objective		Plan Objective 1: Make the most effective and efficient use of land and natural resources. Plan Objective 2: Manage the built and natural environment. Plan Objective 3: Support a thriving economy. Plan Objective 4: Support a healthy and inclusive society.
Target		None.
Outcome	2018	Reduced availability of 10 hour spaces compared to 2017 and the 10 hour spaces in many car parks were full at both the AM and PM counts. Short terms spaces continue to have around 15% free spaces.
	2017	Baseline position established.
Target met?		n/a

Comments (including any risks to delivery)	The level of use of public parking will be monitored in subsequent Annual Monitoring Reports.
Action	None.

IDP policies support proposals for public infrastructure that would assist in providing greater transport choice such as park and ride or park and walk facilities. New large scale public infrastructure will be considered under Policy S5: Development of Strategic Importance. Policy S5 allows for proposals for development that are of Strategic Importance and which may conflict with the Spatial Policy or other specific policies of the IDP as an exception but which are clearly demonstrated to be in the interest of the health, or well-being, or safety, or security of the community, or otherwise in the public interest. The impact any such development has on the use of public car parking in Main Centres will be monitored in future AMRs.

Private Parking

IDP Policy IP7: Private and Communal Car Parking requires proposals for development to take into account the provision of appropriate levels of private and communal car parking in accordance with the guidance set out in Supplementary Planning Guidance: Parking Standards and Traffic Impact Assessment. The Supplementary Planning Guidance (SPG) was approved by the Authority and published alongside the IDP.

There are parking standards for cars (general parking), disabled parking, motorcycles and bicycles. The general parking standards are maximums and apply to a range of uses in the Main Centres and Main Centres Outer Areas (see pages 7 and 8 of the SPG), the standards for parking for disabled people represent a minimum requirement and apply island-wide, the preferential provision for motorcycles in parking arrangements is required island-wide and a minimum cycle parking provision is sought in conjunction with new developments throughout the Island, both for employees, and the public as appropriate.

The SPG advises that the car parking levels are not absolute or inflexible. It states that variations may be allowed depending on the individual characteristics of each site, and sets out criteria for assessment. A review of a cross-section of non-householder applications within the Main Centres and Main Centre Outer Areas in 2018 found that the general car parking provision of 31% of permissions was below the maximum standards, 63% were at the standard and 6% were over the standard. The IDP policies are largely achieving the Standard or below the maximum as was intended. Where parking is over the standard this is generally as a result of a change of use where the new use has a lower parking standard and no changes are proposed to the existing parking.

During the States' debate on the IDP, an amendment[2] was successful in changing the parking standards in the SPG to allow for more car parking in some instances. The amendment sought to retain the principle of maximum parking standards for new developments, but to increase the potential number of parking spaces associated with new residential and office development within the Main Centres and the Main Centre Outer Areas.

[2] Billet D'Etat XXV & XXVII P.2016/25 Amdt 15 Proposed by Deputy A Brouard, Seconded by Deputy T Stephens

Access to car parking is an issue that influences demand for offices and this is considered in the Employment Land Study 2014. However, the Study notes that as businesses are continuously looking to become more efficient, parking spaces for staff members may increasingly become a luxury rather than a necessity (informed by workshop with commercial agents, 2014).

Staff from the Planning Service and the Business, Skills and Innovation section of the C*f*ED held a further workshop with commercial agents in March 2019 primarily to gain information to update the Employment Land Study 2014 but also to gain feedback on the effectiveness of IDP policies. In relation to office use workshop attendees identified the on-site/private provision and nearby public provision of car parking facilities as a key factor when determining the quality of office accommodation, with delegates stating that this was more important than location.

During 2018 there were no planning permissions granted for new office development of any significant size. In future AMRs the parking provision relating to new office developments will be monitored.

The larger permissions for other commercial uses did not raise any issues regarding the provision of parking.

In terms of residential development, a review of the larger permissions in 2018 (there were 9 residential developments of 5 or more units in 2018 – 6 of which were within a Main Centre or Main Centre Outer Area where the general parking standards apply) found that the general parking standards have been met at or near the maximum without any issue.

There is no evidence to suggest that the application of the maximum Parking Standards or the IDP policies in relation to private parking are hindering development in Main Centres.

The Constables of the Vale in their response to the consultation for the AMR commented that a number of new developments in the Vale have insufficient parking for today's family needs which in turn is leading to increased parking on adjacent roads which causes traffic hold ups and prevents the free flow of traffic. Of the sites the Constables refer to only one has planning permission, which includes parking provision in line with the standards with 2 or 3 parking spaces per dwelling, and that development is not yet complete.

The provision of appropriate levels of private and communal car parking within a development is important to its overall quality and function. However, managing the supply of car parking is a key factor in addressing traffic congestion, encouraging people to use more sustainable modes of transport, making more efficient use of land and creating better places for everyone to use and enjoy within the Main Centres and Main Centre Outer Areas. The provision of large numbers of private car parking spaces within a development will do nothing to encourage occupiers and users of the development to access the site by means other than the motor car.

The parking standards are one mechanism that has the potential to encourage a shift toward more sustainable means of transport. Monitoring of the parking standards can contribute toward monitoring the implementation of the Integrated Transport Strategy.

The SPG includes a commitment to review the guidance from time to time and update it accordingly. Separation of the standards from the IDP in supplementary guidance enables this to be done relatively easily. There is no indication at the present time that the standards are hindering development or having any unintended consequences. The Policy Letter regarding the Integrated Transport Strategy may have relevance for IDP policies and the related SPG and will be reviewed accordingly and the outcomes reported in future monitoring.

2017 AMR Action Update – the 2017 AMR had an action to add clarification to the Supplementary Planning Guidance regarding the creation of additional parking space within curtilage and the definitions of private and communal parking. Having given this due consideration, the Authority is of the view that the amendment to the guidance regarding the creation of additional parking space within curtilage is not required. The Planning Service has continued to use internal mechanisms to ensure consistent policy interpretation and advice can be provided to prospective applicants through the pre-application process. The amendment to the SPG regarding the definition of communal parking and the addition of a definition of private parking is carried forward as an action.

In conclusion, there have been a very limited number of cases where an exception to the parking standards has been made. There has been no feedback from consultation to suggest that the standards are causing an impediment to development. The parking standards will be kept under review with annual feedback from commercial agents, internally within the Planning Service and from the C*f*ED and the C*f*E&I.

Summary

In summary, the SLUP requires the IDP to support a reduction in the need to travel by car to assist in reducing the Island's contribution to greenhouse gases. The SLUP requires appropriate provision of parking in new developments but also states that opportunities should be explored to minimise the negative effects of car parking, particularly within the Main Centres. In 2018, there were no planning applications for development to provide transport infrastructure such as park and ride, however through the application of the spatial policy and the Parking Standards the IDP policies have been effective in delivering the requirements of the SLUP by ensuring development encourages a 'modal shift'. In addition, through Development Frameworks, options for reaching the sites concerned, including facilities that will assist in people being able to commute by bicycle, motorcycle or on foot, and connections with public transport, have been considered in detail.

Summary of monitoring requirements

- The level of provision and use of public parking in the Main Centres will be monitored in future Annual Monitoring Reports, with assistance from the Committee *for the* Environment & Infrastructure.

Summary of action required

- Development & Planning Authority to liaise with the Committee *for the* Environment & Infrastructure at an officer level to facilitate implementation of individual elements of the Integrated Transport Strategy such as travel plans, access plans and measures to encourage active travel;
- Development & Planning Authority to liaise with the Committee *for the* Environment & Infrastructure at an officer and political level to consider the role and effectiveness of the Island Development Plan in supporting the aims of the Integrated Transport Strategy and to review the implications for the Island Development Plan of any changes to the Integrated Transport Strategy; and,
- Add clarification to the Supplementary Planning Guidance regarding definitions of private and communal parking.

3. Effectiveness of the Policies of the Island Development Plan to Deliver the Plan Objectives and the proactive elements of the Linking Policies of the Strategic Land Use Plan

Introduction

The Strategic Land Use Plan (SLUP) requires that the Island Development Plan (IDP) monitoring assesses:

- *"How the Development Plans are delivering the proactive elements of the Strategic Land Use Plan, specifically those set out within Section 5 (Linking Policies) of the Plan."*

The SLUP does not indicate which parts of the Linking Policies constitute the proactive elements. The analysis in this section of the AMR takes this to be the aspects of the policies that most clearly relate to the IDP as the principal delivery mechanism. The SLUP also requires the IDP monitoring to assess:

- *"Whether any action is required to maintain and in particular to enhance the effectiveness of delivery of the strategic economic, social and environmental objectives mentioned in this section of the Plan."*

The objectives referred to here are contained in the Economic & Fiscal Policy Plan, the Environmental Policy Plan and the Social Policy Plan, together with the Island Resource Plans of Population Management, Energy and Infrastructure which express the overall strategic objectives of the former States under the States' Strategic Plan (SSP). However, the States' 22 priorities are now set out in the Future Guernsey Plan which supersedes the SSP. Whilst the SLUP remains relevant as it is a statutory plan provided for in Law, the other plans, as component parts of the superseded SSP have now fallen away. Therefore, reference is made to the Future Guernsey Plan throughout the AMR, in particular its 22 Priorities, and the need for any action to maintain or enhance delivery of the States' priorities as expressed in the Future Guernsey Plan, are considered in detail in the individual thematic reports and the analysis below.

To ensure the IDP policies successfully deliver the objectives of the IDP and the SLUP, particularly the proactive elements set out in the Linking Policies of the SLUP, it is necessary to monitor key development plan policies. Details of how certain specific policies are delivering these objectives are set out in the commentary for each thematic report. This section provides an overview of the delivery against the IDP Objectives and how the policies are delivering the proactive elements of the SLUP.

The IDP Objectives are:

1. Make the most effective and efficient use of land and natural resources;
2. Manage the built and natural environment;
3. Support a thriving economy;
4. Support a healthy and inclusive society;
5. Ensure access to housing for all; and,
6. Meet infrastructure requirements.

Plan Objective 1: Make the most effective and efficient use of land and natural resources
To achieve and promote sustainable development through requiring development to make the most effective and efficient use of land and resources while meeting the strategic objectives of the States of Guernsey as set out within the Strategic Land Use Plan.

The Spatial Policy has been effective in concentrating development in the Main Centres. In terms of housing development, the majority of residential developments in the pipeline are located in the Main Centres [68%] as were the majority of approvals in 2018 [58%]. The production of Development Frameworks for some residential developments will help to guide development to ensure the most effective and efficient use of sites. In combination with the Spatial Policy, the IDP policies for Important Open Land have the effect of focusing development on brownfield land within the Main and Local Centres. IDP policies limit the potential for development Outside of the Centres but ensure that efficient use is made of existing buildings with flexibility for conversion of buildings and new uses for redundant glasshouse sites.

IDP policies expect the density of development to be maximised and identifies multi-storey buildings as constituting a more efficient use of land. These issues have been considered for all relevant applications in 2018 and density has been a key issue addressed in Development Frameworks. It is important, in delivering this Plan Objective, to balance the need to make the most effective and efficient use of land with the need for amenity space. This issue will be assessed in future through monitoring the quality of new development.

The SLUP requires the IDP to support a reduction in the need to travel by car to assist in reducing the Island's contribution to greenhouse gases. A key factor influencing journeys by motor car is the provision of car parking, which is not an efficient use of land. There were no planning permissions in 2018 to increase the provision of public parking in the Main Centres or Main Centre Outer Areas. The SLUP requires appropriate provision of parking in new developments but also states that opportunities should be explored to minimise the negative effects of car parking, particularly within the Main Centres. IDP policy for private parking, and detailed consideration of sites through Development Frameworks, is limiting the provision of general car parking in new development and promoting the use of alternative modes of transport.

The IDP policies promote the re-use of existing buildings. The IDP policies for the re-use of redundant buildings provide a positive and pragmatic approach to the reuse of existing substantial and structurally sound buildings. The IDP has introduced a more flexible approach to make efficient use of redundant glasshouse sites. Approximately 2.28 hectares of glass is required to be cleared in order to implement the planning permissions granted in 2018. Although this is not extensive it is apparent that the IDP policies are securing the removal of redundant glasshouses from sites through the grant of planning permission to appropriate uses. Overall, IDP Policy OC7 has been effective in securing the removal of some redundant glass and restoration of the landscape contributing toward Plan Objective 1.

Areas known to be at risk of flooding have been established through the Guernsey Coastal Defence Flood Studies and approved strategy, 2013 (Billet d'État XV, July 2013). This is taken into account when determining planning applications and does not preclude development in

these areas. This approach of designing development to be resilient to climate change and flooding helps contribute to this Plan Objective of making the most efficient use of land. In 2018 there were 27 planning permissions in the areas of the Island most liable to flooding.

IDP policies also seek the effective and efficient use of natural resources. This includes requirements for sustainable design and construction, the promotion of renewable energy generation and reducing construction waste.

IDP policies support the production of energy on a commercial basis from renewable sources. Activity in this sector has been quite limited to date. While IDP policies have been found to ensure that the design of development takes account of energy and climate change, only a small proportion of applications include renewable energy equipment (25 planning permissions in 2018 incorporated renewable energy equipment into the built form of an existing or proposed development). Further monitoring is required to assess if Plan Objective 1 is being delivered in this regard.

In terms of construction waste, the IDP encourages the consideration of the reduction of construction waste at the earliest stages of the design process and throughout the construction and pre-construction phases of development through a requirement for the submission of a Site Waste Management Plan with planning applications for certain development. Information from these submitted Site Waste Management Plans is being captured and analysed, however additional information on waste management for the duration of the construction period is needed in order to assess whether industry standard baseline targets are being met. This will help assess the effectiveness of the IDP policies in delivering Plan Objective 1.

The IDP policies which are effective in delivering this Plan Objective also contribute to the delivery of the proactive elements of the SLUP Linking Policies relating to:

- Conserve and enhance the built and natural environment (LP1);
- Improve energy efficiency (LP2);
- Reduce the need to travel (LP2);
- Enable renewable energy (LP2);
- Take account of flood risk in the location of development (LP3);
- Make best use of resources (LP4);
- Promote public transport (LP5);
- Make provision for regeneration (LP7);
- Minimise the negative impact of cars (LP8);
- Promote the regeneration of the Main Centres through guidance (LP9);
- Promote sustainable communities within the Local Centres (LP10);
- Harness investment in the harbours (LP11);
- Adopt a flexible approach to sites that become obsolete Outside of the Centres (LP12); and,
- Facilitate removal of redundant glasshouse sites (LP13).

Plan Objective 2: Manage the built and natural environment

To conserve and enhance the high quality of the built and natural environment while appropriately balancing the protection of important buildings or structures and open and

undeveloped land with the need to ensure that an adequate amount of land can be made available for meeting legitimate development requirements, in accordance with the Strategic Land Use Plan and the Principal Aim of the Island Development Plan.

IDP policies seek to conserve and enhance the special interest of the historic built environment. Based on the number of planning applications approved, Policies GP4, GP5 and GP6 appear to be successful in achieving the balance between allowing for new development and the modernisation of existing buildings and the need to protect what is special about an area, building or monument. However, in reaching the above conclusions, it must be noted that very few developments have been completed and, therefore, the effect on the special interest of an area, building or monument cannot be effectively monitored yet. When planning permissions are implemented their effect on the special interest of the area, building or monument can be monitored and a more complete picture will begin to emerge.

A significant challenge for the IDP is to provide the balance between protecting the built environment and the historic identity of the Main Centres, whilst meeting the economic, environmental and social development needs as may be required by businesses and the community. Due to this report being written at a time when Design Quality Indicators have not yet been agreed and when approvals under IDP policies are just beginning to be implemented generally, it is not possible to conclude whether or not IDP policies for design and sustainable construction have been successful in delivering their intended purposes. There is no evidence at this time however to suggest that the IDP policies with regard to the built heritage and new development are not delivering the requirements of Plan Objective 2 as intended and therefore there is no requirement to amend the policies.

The IDP contains a number of policies that contribute towards the conservation and enhancement of the high quality of the natural environment. This includes policies for open land and for biodiversity interest.

The agricultural industry plays a key role in managing the natural environment, and IDP policies provide support to enable the continuation of a viable agricultural industry within the Island. This includes the protection offered through the Agriculture Priority Area (APA) designation, as well as assessment of redundant glasshouse sites adjacent to the APA for their contribution to commercial agriculture. Evidence suggests that there remains sufficient agricultural/horticultural land to meet the current and future needs of the agricultural industries, however this is still worth monitoring closely to ensure both sufficient land, and land in the right place, is being provided.

A particular issue relating to the natural environment are the number of planning approvals relating to the change of use of agricultural land to domestic garden, which resulted in a total of 14.5 hectares (88.5 vergées) of land changing use Outside of the Centres to domestic curtilage (including both land within and outside the APA). The policies appear to be meeting the aspirations of homeowners, but this must continue to be balanced with both the needs and aspirations of the agricultural industry and the general requirement to ensure that development of land does not result in the unnecessary loss of open and undeveloped land which would have an unacceptable impact on the open landscape character of an area.

The flexible approach to redundant glasshouse sites in the IDP helps to ensure that an adequate amount of land can be made available for meeting legitimate development requirements as required by the Plan Objective. 22 planning applications were received for redundant glasshouse sites in 2018, a 100% increase on 2017.

IDP policies for Sites of Special Significance (SSS) and Areas of Biodiversity Importance (ABI) have been effective in conserving the natural environment. The policies have provided for a proportionate approach with two levels of protection, giving a higher level protection where there is particular special interest, but allowing for development in ABIs where impacts are considered and mitigated. SSS designation places significant constraints on development that might harm the special interest of a SSS, but it is recognised that there are existing commercial and recreational uses in these areas. The polices of the IDP are, therefore, flexible enough to allow reasonable opportunities to maintain and expand activities associated with these existing uses where it is consistent with other IDP policies and in 2018 there were a number of planning applications approved in SSSs. There were also a number of approvals in ABIs where the designation ensured that the biodiversity interest in the sites was taken into account. In addition, the policies for Important Open Land have ensured these areas have been protected from adverse impacts through development.

Concern has been expressed at the potential through IDP policies to develop greenfield sites and that preference should be given to brownfield sites first. The IDP has to balance the requirement for a supply of land for development with the protection of the most important green spaces. The areas of Important Open Land designated through the IDP, together with the spatial strategy, at a high level, places an emphasis on brownfield development. It is considered that the IDP is effective in meeting the SLUP requirement to “promote the development of pre-used brownfield sites in order to maximise the use of land and buildings in the most efficient and effective manner” (Policy SLP18). Policies do allow for some greenfield sites within the Centres to be developed, including housing and employment allocations, where this accords with IDP policy and this reflects the SLUP requirement to balance the development demands on land generally and that the SLUP recognises that some greenfield land will need to be identified for development. A low proportion of sites that have been given permission under the IDP are greenfield and a number of those relate to conversions of redundant horticultural or agricultural buildings that are considered to be greenfield sites in planning law. While it appears that Plan Objective 2 is being implemented in this regard, monitoring will inform a review of the areas of Important Open Land in the Centres as part of and alongside the IDP 5 year housing land supply review as the two are linked – i.e. the relationship between open land and the built environment within the Centres which could have changed over time. This will also give the opportunity for an evidence based review of the criteria / definition of Important Open Land to make sure it is still appropriate and allow consideration of whether there is evidence that some designations need to be added or changed in view of development which has happened over the first 5 years of the IDP.

The IDP policies which are effective in delivering this Plan Objective also contribute to the delivery of the proactive elements of the SLUP Linking Policies relating to:

- Conserve and enhance the built and natural environment (LP1);

- Reduce greenhouse gasses (LP1);
- Improve energy efficiency (LP2);
- Take account of flood risk in the location of development (LP3);
- Promote climate change resilience (LP3);
- Promote SuDs (LP3);
- Promote sustainable design (LP4);
- Promote public transport (LP5);
- Allocate sites for offices, industry and retail (LP6);
- Make provision for regeneration (LP7);
- Provide flexibility for householder aspirations (LP7);
- Improve public areas (LP8);
- Minimise the negative impact of cars (LP8);
- Promote the regeneration of the Main Centres through guidance (LP9);
- Harness investment in the harbours (LP11);
- Adopt a flexible approach to sites that become obsolete Outside of the Centres (LP12); and,
- Facilitate removal of redundant glasshouse sites (LP13).

Plan Objective 3: Support a thriving economy
To achieve and promote economic development that meets the strategic objectives of the States of Guernsey as set out within the Strategic Land Use Plan and the Principal Aim of the Island Development Plan.

'Economic development' relates to a range of uses that generate employment and contribute to the prosperity of the Island.

Planning policies are considered to be delivering Plan Objective 3 in relation to office accommodation. However, while the current planning polices reflect the direction of the SLUP, the policy approach seeking existing accommodation to be upgraded to primary quality where feasible may be unrealistic and no longer be appropriate.

Instead there is general consensus on the need to provide a range of accommodation of different sizes and quality to meet business needs now and in the future. The current flexibility in planning policies to allow for release of existing stock to alternative uses may no longer be appropriate in light of growing demand for small to medium sized high quality units and the continuing surplus of stock of unsuitable quality. In addition, there is a call to re-examine the continued protection of some existing housing stock that forms part of overall office development in light of the current housing pipeline supply and future requirements.

To this end, a detailed analysis of the existing stock within the Main Centres against the suggested quality criteria should give an agreed picture on the range and quality of the existing stock. This research should then inform the 5 year review of employment land and any requirement to amend planning policies.

Planning policies are providing flexibility to allow for a range of new industrial, storage and distribution uses including creative industries throughout the island and also providing appropriate support to existing uses. The high level of planning approvals is evidence of the flexibility of the policies. In particular, the IDP's increased flexibility within identified KIAs of allowing storage and distribution uses has already had a positive impact. The policy approach of designating KIEAs provides a buffer of land so the island can respond to new and emerging industries in the future. The policies currently in place provide for small scale businesses Outside of the Centres in accordance with the directions of the SLUP and in both 2017 and 2018 have delivered significant additional industrial, storage and distribution land. This trend of supply Outside of the Centres as opposed to within the Main Centres may be an initial response to the change in policies brought in by the IDP and may not continue. Overall, the IDP policies are generally delivering in relation to the Spatial Strategy by concentrating development in the Centres but the analysis highlights the need to continue to monitor and review the extent and nature of employment development occurring Outside of the Centres to ensure that policies continue to deliver the Spatial Strategy. This should form part of the scheduled 5 year employment land supply review.

The agricultural industry plays a relatively small part in Guernsey's economy but it has a valuable land management function, which in itself is a contributor to other sectors of the economy (for example tourism), as well as adding to the quality of life and social well-being of Islanders. Through the APA designation, there is a focus on protecting large areas of contiguous agricultural and other land for the benefit of the agricultural industry, and policies support proposals relating to existing agricultural and horticultural operations, including diversification such as a small farm shop, or the provision of visitor accommodation where this is ancillary to the agricultural operation. From the evidence gathered, the APA designation appears to be working as intended by supporting proposals related to the agricultural and horticultural industries, including making provision for diversification of those industries. This is balanced with allowing other legitimate uses, as required by the SLUP. Changes of use away from agricultural land will continue to be monitored to ensure that the policies are providing the correct balance.

The contraction and consolidation of the horticultural industry is recognised in the IDP and policies are in place to support the management of this trend. However should the industry change (for example through the potential establishment of cannabinoids ('CBD') businesses), then there is nothing to suggest, at this time, that the IDP policies would provide any block to such development on existing commercial horticultural sites.

The IDP requires all redundant glasshouse sites within and adjacent to the APA to revert to agricultural land, unless it is demonstrated that it cannot positively contribute to commercial agricultural use. In 2018, there were 4 applications for the change of use of redundant glasshouse sites within the APA, 3 of which were approved, and 3 applications on sites adjacent to the APA, 1 of which was approved. Going forward the Planning Service will continue to keep a record of cleared redundant glasshouse sites that are within and adjacent to the Agriculture Priority Area which will establish the sites that are contributing to the larger swathes of agricultural land.

IDP policies remain relevant and effective in supporting appropriate levels of retail development in the Core Retail Areas. The reassessment of the Core Retail Areas as required by the SLUP and its contraction as part of the IDP process supported by policies has resulted in maintenance of a core retail function in Main Centres, and primarily in St Peter Port as required by the SLUP. There remains, however, no updated Retail Study to establish future needs for retail space. As such, liaison with the C*f*ED will continue including in relation to the emerging draft Retail Sector Policy Statement.

The IDP policies in relation to visitor accommodation are performing as intended and give positive support to new businesses (there were permissions for new self-catering and guest accommodation in 2018) and existing businesses to adapt or expand their premises as demonstrated by the approval of all applications submitted, which indicate that there is continuing investment in premises. Until such time as the States has debated the Policy Letter for a Tourism Strategy, the policies of the IDP effectively deliver the requirements of the SLUP and remain relevant.

The IDP policies relating to the Harbour Action Areas (MC10) and Regeneration Areas (MC11) are performing as intended, allowing minor development to come forward without undermining the comprehensive approach to development that will come through the IDP mechanisms of Local Planning Briefs (for the Harbour Action Areas, in support of the Seafront Enhancement Area programme) and Development Frameworks (for the Regeneration Areas). These mechanisms, put in place in the IDP, will be central to allowing the development of these areas and could be the catalyst to delivering significant social, economic and environmental development and enhancement.

The IDP policies which are effective in delivering this Plan Objective also contribute to the delivery of the proactive elements of the SLUP Linking Policies relating to:

- Promote public transport (LP5);
- Allocate sites for offices, industry and retail (LP6);
- Define retail cores (LP6);
- Take a flexible approach to uses (LP6);
- Make provision for regeneration (LP7);
- Promote the regeneration of the Main Centres through guidance (LP9);
- Focus retail on suitable retail cores (LP9);
- Harness investment in the airport (LP11);
- Harness investment in the harbours (LP11); and,
- Adopt a flexible approach to sites that become obsolete Outside of the Centres (LP12).

Plan Objective 4: Support a healthy and inclusive society

To achieve and promote development that supports a healthy and inclusive society where this meets the strategic objectives of the States of Guernsey, as set out within the Strategic Land Use Plan and the Principal Aim of the Island Development Plan.

This Plan Objective highlights that an important aspect of a high quality of life is access to a range of social, community, leisure and recreation services and facilities, recognising that provision of adequate facilities is fundamental to the health and well-being of the Island

community. Whilst the planning applications submitted in 2018 relating to social and community and leisure and recreation facilities do not show a significant rise in demand and do not suggest that the IDP policies are not effective, there is limited evidence regarding the level of need and demand for these facilities and uses. Further research is required to establish a detailed baseline of the current provision of social, community, leisure and recreation facilities throughout Guernsey and further dialogue with the Committee *for* Education, Sport & Culture and the Committee *for* Health & Social Care (C*f*H&SC) to establish levels of need and demand. This will allow assessment of the future requirement for these uses in terms of land use and provide evidence on the effectiveness of the IDP policies to deliver development to address identified needs and demands. For future monitoring of the effectiveness of policies to provide social and community and leisure & recreation facilities in Guernsey it would be informative to talk to local communities in order to establish more qualitative data. This would provide greater insight into the performance of the policies whilst also giving us a greater understanding of the public's view point. Notwithstanding the above and the lack of data at this time the IDP policies generally appear to be effective in delivering Plan Objective 4.

This Plan Objective states that the IDP has a significant part to play in removing the barriers that prevent some Islanders being fully included in Island life. IDP Policy GP8: Design expects proposals to demonstrate accessibility to and within a building for people of all ages and abilities; and, with regard to residential development, offers flexible and adaptable accommodation that is able to respond to people's needs over time. It is not clear at present if the Policy is sufficient to deliver a higher level of accessibility than the minimum requirement of Guernsey's Building Regulations. This issue will be monitored through the assessment of the quality of new development in future monitoring. This will allow for a review of the effectiveness of IDP policies in delivering this Plan Objective. Over 2018, the methodology and indicators have been drafted, which has become known as Design Quality Indicators (DQIs). Consultation with key stakeholders is expected to occur in 2019.

The Main and Local Centres have a key role in delivering this Plan Objective's requirement for an inclusive society through the range of services and facilities they provide in accessible locations. Local Centres are community focal points and a general convenience store selling fresh food and produce is seen as essential to their role, and an important part of monitoring is to ensure that there is an appropriate level, range and balance of uses within the Local Centres to support them as sustainable Centres. There have been no changes in the Local Centres in terms of convenience retail provision and all of the Local Centres have at least one general convenience retail store. Planning approvals in 2018 include additional convenience retail provision in Cobo. Policy LC5: Retail in Local Centres seeks to ensure that essential convenience retail facilities within Local Centres are retained.

Limited development of an appropriate scale to the Local Centre concerned is supported by policies in the IDP to complement the existing role of the Centre and support them as socially inclusive, healthy and sustainable communities. There has been very little change during 2018. However, trends over time will continue to be monitored and the Community Hubs, as proposed by the C*f*H&SC might influence additional facilities within the Local Centres in the future.

The IDP policies which are effective in delivering this Plan Objective also contribute to the delivery of the proactive elements of the SLUP Linking Policies relating to:

- Reduce the need to travel (LP2);
- Sustainable communities (LP5);
- Adaptable homes (LP5);
- Promote public transport (LP5);
- Good accessibility (LP5 and LP6);
- Make provision for regeneration (LP7);
- Improve leisure uses in the harbours (LP8);
- Minimise the negative impact of cars (LP8);
- Promote the regeneration of the Main Centres through guidance (LP9);
- Promote sustainable communities within the Local Centres (LP10); and,
- Harness investment in the harbours (LP11).

Plan Objective 5: Ensure access to housing for all
To achieve and promote a broad range of housing development that ensures an appropriate amount, mix and type of housing, including affordable housing, where this meets the strategic objectives of the States of Guernsey, as set out within the Strategic Land Use Plan.

The IDP policies have been effective in meeting the requirements of Plan Objective 5, including a 2 year pipeline supply of housing permissions and a 5 year supply of housing land. Both are in excess of the minimum requirement, taking into account the change to the Strategic Housing Indicator. Given the current annual indicator for the completion of 97-157 additional new dwellings per year, the pipeline supply requirement equates to planning permissions for at least 194-314 new dwellings (136-230 private market, 58-84 Affordable Housing). The pipeline supply was 767 (672 private market, 95 Affordable Housing) dwellings at the end of 2018. The pipeline supply includes 440 full permissions, 16 outline permissions and 311 dwellings under construction.

It should be noted that although the IDP is fulfilling the requirements of the SLUP by putting in place policies which allow for the effective provision of dwellings to meet the indicator requirement, planning permissions do not necessarily result in the housing being built so this does not necessarily mean that the States Indicator is being met. The rate of completion of housing depends on a range of other factors such as the economy and construction industry capacity and falls outside of the control of the IDP policies. The SLUP recognises that ensuring that appropriate housing development is actually built will involve cross-committee working and the adoption of a proactive attitude towards housing development.

The policies have also been effective in concentrating housing development in the Main Centres - the majority of residential developments in the pipeline are located in the Main Centres [68%] as were the majority of approvals in 2018 [58%]. Although the percentage of housing supply from Main Centres is lower than anticipated, the majority is still located in Main Centres and the IDP policies are therefore effective in delivering the Spatial Strategy of the SLUP. 24% of the dwellings in the pipeline supply are located Outside of the Centres however a significant proportion of these are on sites permitted prior to the adoption of the IDP under Rural Area Plan Policy RH2 for social housing. Since the adoption of the IDP, permissions for residential development Outside of the Centres have only been to convert

redundant buildings or sub-divide existing buildings or to replace dwellings on a one for one basis, making efficient use of existing sites and redundant buildings.

There has been relatively slow progress with delivery of larger housing sites including a number of housing allocation sites that may be in part due to economic conditions. This has resulted in no sites to date having a requirement for Affordable Housing under Policy GP11. No blockages to delivery have been identified to date but this will be kept under review. There have however been a number of planning permissions for the Guernsey Housing Association for Affordable Housing. Permission has been given for 56 dwellings under the IDP for a range of types of Affordable Housing including key worker accommodation. Requirements for Affordable Housing were also set out in Development Frameworks approved by the Authority in 2018. The pipeline supply includes 94 Affordable homes.

An appropriate mix of housing is required by this Plan Objective. In 2018, a mix of sizes of dwellings has been required on larger sites with reference to the Strategic Housing Indicator endorsed by the States in 2018 and the findings of the Guernsey Housing market Review, 2017. Overall in 2018 there has been an over delivery of permissions for 1 bed and 4/5+ bed private market dwellings and an under delivery of permissions for 2 and 3 bed private market dwellings. This is not an exact comparison, however, as not all sites can provide a mix of dwellings. This issue will however be kept under review in future monitoring. Planning permissions in 2018 include 64% houses, 35% flats, 0% sheltered accommodation and 1% Houses in Multiple Occupation. The Committee *for the* Environment & Infrastructure (C*f*E&I) Policy Letter 'Local Market Housing Review and Development of Future Housing Strategy' was debated in July 2018 and a 'Programme of Works' was endorsed that will help inform the development of a revised Housing Strategy for Guernsey. One workstream recognises the importance of the regular collection and publication of relevant and reliable data for the analysis of future housing requirements. This is to be achieved via the research and establishment of an appropriate housing data collection model, data collection processes and monitoring and review of future housing indicators and recommends joint working between the C*f*E&I, the Authority and the Committee *for* Employment & Social Security (C*f*E&SS) to achieve this. Accurate, robust and real-time data will be essential in order to be able to ensure that new housing is reflective of the demographic profile of households requiring housing at any one time in accordance with the housing policies of the IDP. The effectiveness of IDP housing policies to ensure the mix and type of units being built are what the Island requires is therefore dependent upon the successful implementation of the workstream identified by the C*f*E&I.

The IDP policies which are effective in delivering this Plan Objective also contribute to the delivery of the proactive elements of the SLUP Linking Policies relating to:

- Adaptable homes (LP5);
- Good accessibility (LP5 and LP6);
- Make provision for housing development (LP7);
- Make provision for regeneration (LP7);
- Provide flexibility for householder aspirations (LP7); and,
- Promote the regeneration of the Main Centres through guidance (LP9).

Plan Objective 6: Meet infrastructure requirements
To achieve the provision of infrastructure where required for the most effective and efficient functioning of the Island, in order to meet the strategic objectives of the States of Guernsey, as set out within the Strategic Land Use Plan.

IDP policies are in place which allow for specific strategic and infrastructure development to take place now and safeguard areas for strategically important development (the Infrastructure section of the IDP), and allow for potential developments in the future which have yet to be identified (policies S5 and S6, which could be important for implementation of the Long-term Infrastructure Investment Plan). In 2018 an application was submitted, and approved early in 2019, using Policy S5. This was the first test of the policy, and only use of the policy to date, and positively shows that the principle works.

IDP policies also allow for minor and inconsequential development to progress as indicated by planning permissions granted in 2018. Therefore no blockages by IDP policies have been identified to delivery of essential strategic and infrastructure development now or in the future. IDP policies have been shown to give positive and flexible support to delivery and fulfil the requirements of Plan Objective 6.

Concern has been expressed with regards to the potential impact of new development on existing infrastructure such as the road network. There is an emerging Long-Term Infrastructure Investment Plan which is one of the 22 priorities within the Future Guernsey Plan. This will determine the priorities for the long-term infrastructure investment requirements of the States. The plan will help the Authority to ensure infrastructure is taken into account in determining proposals for new development and the relationship and impacts of the emerging plan, the IDP policies and the Strategic Land Use Plan will need to be considered in due course. Until such time as the plan is available, the Authority will continue to consult with stakeholders to consider the implications of development.

The IDP policies which are effective in delivering this Plan Objective also contribute to the delivery of the proactive elements of the SLUP Linking Policies relating to:

- Enable renewable energy (LP1);
- Reduce the need to travel (LP2);
- Enable renewable energy (LP2);
- Support the waste strategy (LP2);
- Promote climate change resilience (LP3);
- Promote SUDs (LP3);
- Promote public transport (LP5);
- Make provision for regeneration (LP7);
- Improve leisure uses in the harbours (LP8);
- Promote the regeneration of the Main Centres through guidance (LP9);
- Allow for infrastructure development (LP11);
- Harness investment in the airport (LP11); and,
- Harness investment in the harbours (LP11).

Conclusions

The AMR for 2018 has found that the IDP policies are generally performing as intended and contributing towards delivering the Plan Objectives and the proactive elements of the Linking Policies of the Strategic Land Use Plan.

In 2018 there was a high rate of approval of planning applications (only 37 applications were refused out of 1550 applications determined in the year, representing 2.4% - a small increase from 2017) and only 4 appeals against refusal of planning permission were made during 2018, all of which were dismissed. There was a low rate of planning applications approved as a 'minor departure' from the IDP policies in 2018 (2 permissions). This illustrates how the positive and flexible policies of the IDP, along with encouragement of high quality pre-application discussions, have enabled positive outcomes to be reached for the vast majority of planning applications, and potentially costly appeals avoided.

These findings illustrate that the IDP provides for the types of development the States needs and strikes a successful balance between the purposes of the Land Planning and Development (Guernsey) Law, 2005, personal choice and aspiration, the public interest, and supporting the heritage and natural environment of the Island whilst at the same time providing for the economic and social needs required by businesses and the community and balancing the competing demands for land.

This is the second Annual Monitoring Report for the IDP. As such, in most cases it is too early to identify trends. There has been positive feedback on the IDP, but it is clear that in a small number of instances, it will be important to provide further clarity and guidance to ensure IDP policies are fully understood so that they can perform as intended and deliver the Plan Objectives. In addition, a number of key issues have been identified to keep under review in future monitoring including, in some instances, the need for further research prior to the 5 year review of the IDP (2021). These issues include:

- The need for a Long-Term Infrastructure Investment Plan (a priority of the Future Guernsey Plan) to provide information for the Authority to take into account in determining proposals for new development and to guide future policy;
- Further to the 2018 Policy Letter 'Local Market Housing Review and Development of Future Housing Strategy', the need for a detailed model to determine, and monitor, the Island's housing requirements in the future including the type, size and tenure of new housing;
- The delivery of Affordable Housing via the requirements of Policy GP11;
- The threshold for a Development Framework being required and the process for producing Development Frameworks;
- The need for progress with Development Frameworks for Regeneration Areas;
- The growing demand for small to medium size high quality office accommodation and the flexibility in policy to allow for release of existing stock;
- The extent and type of new industrial and storage development Outside of the Centres in relation to the Spatial Policy;
- The need for a revised Tourism Strategic Plan to inform policy for visitor accommodation;
- The need for a retail study to provide information for the Authority to take into account in determining proposals for new development and to guide future policy;

- The amount of land changing use from agricultural land to domestic garden and the implications for the Agriculture Priority Area and landscape of the Island;
- Provision of more up-to-date survey information for Areas of Biodiversity Importance;
- The effectiveness of Site Waste Management Plans in reducing levels of construction waste; and,
- The effectiveness of Policies GP8 and GP9 in delivering their intended purposes, in particular with regard to sustainable design and lifetime homes, to be assessed through Design Quality Indicators.

Subsequent to the drafting of this AMR, the Authority published an Action Plan (2019) in June 2019 to address concerns with the IDP raised following the publication of the 2017 AMR, in particular during a States' debate in November 2018. The document sets out actions and a number of these address similar issues to those listed above. The Action Plan is available here: https://gov.gg/dpaplan2019

In conclusion, the policies of the IDP are considered to be effective, robust and relevant, including in delivering the land use elements of the priorities of the States as set out in the Future Guernsey Plan. The IDP is flexible and delivering the land use requirements of the States as required by the Strategic Land Use Plan. No specific blockages have been identified to delivering these requirements. There are, however, a number of matters, as highlighted above that require further research to fully understand the issues and the most appropriate way forward including whether amendment of policies is required. Work on the 5 year review is underway in the Planning Service and as such this is considered the best process to research the issues and make further amendments to the IDP, if required, alongside the required review of housing and employment land. A number of issues are linked and need to be addressed together and by setting out all of the issues and potential amendments to the IDP in one consultation process this will help to ensure effective engagement. Therefore, there is no proposal to amend the SLUP or to amend the IDP prior to the 5 year review at this stage.

Comments from the Committee *for the* Environment & Infrastructure

The Development & Planning Authority requested that the C*f*E&I confirmed that it agrees that the objectives of the SLUP are being delivered, so far as they can be, (in terms of the Linking Policies) by the policies in the IDP. The Authority also asked C*f*E&I to advise whether it has identified any need for the States to amend the SLUP[1] or the IDP[2] or whether it considers guidance is needed or other action required by the States.

The full response from the C*f*E&I can be found at Appendix 2. In summary, the Committee generally agrees that the IDP is delivering the objectives of the SLUP and can support delivery of the States' priorities and the Committee has not identified any evidence of need to amend the IDP policies at this time. The Committee also concludes that the SLUP is

[1] A review of the Strategic Land Use Plan would require approval from the States of Deliberation.

[2] Where amendment of the Island Development Plan is considered necessary, any change to policies would be subject to the full inquiry procedure set out under the planning legislation; this may include an Environmental Impact Assessment as part of the review and the accompanying Environmental Statement would be updated accordingly.

delivering what was intended by the States and there is no evidence of need to re-visit the States' clear decisions of policy principle in terms of the spatial distribution of development. The Committee has made specific comments with regards to the designation of Areas of Biodiversity Importance, the clearance of redundant glasshouses and the monitoring of the maximum parking standards.

Definition of Abbreviations

ACLMS	States of Guernsey Agriculture, Countryside and Land Management Services
ABI	Area of Biodiversity Importance
AMR	Annual Monitoring Report
APA	Agriculture Priority Area
Authority	Development & Planning Authority
BMV	Best and Most Versatile Land
CACA	Conservation Area Character Appraisal
CBD	Cannabinoids
C*f*E&I	The Committee *for the* Environment & Infrastructure
C*f*ED	The Committee *for* Economic Development
C*f*ES&C	The Committee *for* Education, Sport & Culture
C*f*E&SS	The Committee *for* Employment & Social Security
C*f*H&SC	The Committee *for* Health & Social Care
C*f*HA	The Committee *for* Home Affairs
CRA	Core Retail Area
DF	Development Framework
DQI	Design Quality Indicator
ELS	Employment Land Supply
GHA	Guernsey Housing Association
Goad	Retail monitoring system using standard classification codes, used in the UK and Ireland
GSA	Guernsey Society of Architects
GTA UC	Guernsey Training Agency and University Centre
GVA	Gross Value Added
Ha	Hectare (10,000m^2) – to assist in the understanding of a Hectare, the Footes Lane pitch is 0.64Ha and the model yacht pond is 0.5Ha.
HAA	Harbour Action Area
IDP	Island Development Plan
ITS	On-Island Integrated Transport Strategy
KIA	Key Industrial Area
KIEA	Key Industrial Expansion Area
La Société	La Société Guernesiaise
LC	Local Centre
LVCR	Low Value Consignment Relief
MC	Main Centre
MCIA	Main Centre Inner Area
MCOA	Main Centre Outer Area
OTC	Outside of the Centres
P&RC	The Policy & Resources Committee
PEH	The Princess Elizabeth Hospital
RA	Regeneration Area
SEA	Seafront Enhancement Area
SHLAA	Strategic Housing Land Availability Assessment

SLUP	Strategic Land Use Plan
SPG	Supplementary Planning Guidance
SSS	Site of Special Significance
STSB	States' Trading Supervisory Board
SuDS	Sustainable Urban Drainage Systems
THS	States of Guernsey Traffic and Highway Services
v	Vergée (1,638.8m^2)
WHO	World Health Organisation
WTS	Waste Transfer Station

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https://www.gov.gg/article/157607/States-Meeting-on-15th-February-2017-Billet-V
Billet d'Etat XXIV & XXV, 2017
https://www.gov.gg/article/162531/States-Meeting-on-13-December-2017-Billets-XXIV--XXV

Supported Living and Ageing Well Strategy (SLAWS):
https://www.gov.gg/slaws

Visit Guernsey and Guernsey Chamber of Commerce - Guernsey Tourism Strategic Plan 2015-2025: https://www.gov.gg/CHttpHandler.ashx?id=95798&p=0

Other evidence

Environmental Pollution (Guernsey) Law, 2004 Part Vii - Air Pollution – Policy Letter, February 2017:
https://www.gov.gg/article/157185/Environmental-Pollution-Guernsey-Law-2004-Part-Vii---Air-Pollution

Experian Goad Retail: https://www.experian.co.uk/goad/goad.html

Guernsey Water's Surface Water Management Policy and guide to permeable surfaces:
http://www.water.gg/SuDS

House of Commons Briefing Paper: Retail Sector in the UK. October 2018:
https://researchbriefings.parliament.uk/ResearchBriefing/Summary/SN06186

Scrutiny Management Committee Policy Letter 'In Work Poverty Review':
https://www.gov.gg/CHttpHandler.ashx?id=116517&p=0

SUMMARY OF ACTIONS AND FURTHER MONITORING REQUIREMENTS

The table in this section is a summary of the actions and monitoring requirements identified within the 2017 and 2018 Annual Monitoring Reports (AMR). The page numbers relate to the 2018 AMR. Please refer to the relevant page in the 2018 AMR for an update on the implementation of the 2017 actions and monitoring requirements. In many case the actions / requirements relate to ongoing work so are carried forward from 2017. In some cases there is no corresponding action for 2018 and the reason for this is given in the relevant thematic report. In some cases there are new actions that do not relate to any actions identified in the 2017 AMR.

2017 AMR Action / Monitoring Requirement	2018 AMR Action / Monitoring Requirement
Strategic Development and Infrastructure	
Development & Planning Authority to be an intrinsic part of the Seafront Enhancement Area group to deliver the Local Planning Brief for the St Peter Port Harbour Action Area (p. 16)	The Authority to work closely with, and be an intrinsic part of, the SEA group to help deliver the Local Planning Brief(s) (or other appropriate mechanism(s)) for the Seafront Enhancement Area (p. 16) The Authority to work closely with, and be an intrinsic part of, the SEA group to help deliver the Local Planning Brief (or other appropriate mechanism) for the St Peter Port Harbour Action Area (p. 16) The Authority to work closely with, and be an intrinsic part of, the SEA group to help deliver the Local Planning Brief (or other appropriate mechanism) for the St Sampson's Harbour Action Area (p. 17)
Development & Planning Authority to investigate options to progress discussions leading to Development Frameworks for Lower Pollet and Le Bordage/Mansell Street Regeneration Areas and complete work on the Development Framework for South Esplanade and Mignot Plateau (p. 19)	The Authority to investigate options to progress Development Frameworks for Lower Pollet and Le Bordage/Mansell Street Regeneration Areas and complete work on the Development Framework for South Esplanade and Mignot Plateau (p. 19)
Review progress of the Leale's Yard Regeneration Area in the 2018 AMR (p. 18)	Review progress with the Lower Pollet, Le Bordage/Mansell Street and South Esplanade and Mignot Plateau Regeneration Areas in future monitoring (p. 19) Review progress of the Leale's Yard Regeneration Area in future monitoring (p. 20) Should the full planning permission for Leale's Yard lapse in 2019, the Authority to

2017 AMR Action / Monitoring Requirement	2018 AMR Action / Monitoring Requirement
	commence a Development Framework for the Leale's Yard Regeneration Area (p. 20)
Housing	
Joint working between the Development & Planning Authority, the Committee for Employment & Social Security (whose mandate includes delivery of Affordable Housing), the Committee for the Environment & Infrastructure and the Policy & Resources Committee in order to address any actions and decisions that arise from the debate of the Policy Letter 'Local Market Housing Review and Development of Future Housing Strategy' in July 2018, particularly in relation to the monitoring of housing supply and need and the establishment of an appropriate data collection model and data collection processes (p. 26)	Joint working between the Development & Planning Authority, the Committee *for* Employment & Social Security (whose mandate includes delivery of Affordable Housing), the Committee *for the* Environment & Infrastructure and the Policy & Resources Committee in order to implement the 'Programme of Works' endorsed by the States following the debate of the Policy Letter 'Local Market Housing Review and Development of Future Housing Strategy' in July 2018, particularly in relation to the monitoring of housing supply and need and the establishment of an appropriate data collection model and data collection processes (p. 26)
Future monitoring to establish where new residential development is located within the Main Centres and Main Centre Outer Areas in terms of green field and brown field sites (p. 33)	
Future monitoring to include the locations of residential development within the Main Centres and Main Centre Outer Areas (permissions, commencements and completions since the adoption of the IDP) to determine if there is a pattern or trend and to inform future decisions about housing land supply (p. 34)	
Including monitoring of the number of bedrooms in future Quarterly Monitoring Reports as well as the 2018 Annual Monitoring Report (p. 37)	
The Development & Planning Authority to regularly liaise with the Committee for Employment & Social Security at an officer and political level to update on progress with the larger housing sites (p. 51)	The Development & Planning Authority to regularly liaise with the Committee *for* Employment & Social Security at an officer and political level to update on progress with the larger housing sites (p. 51)
Guidance is needed for agents and those working collaboratively on the production of Development Frameworks on the standard that is required (p. 55)	

2017 AMR Action / Monitoring Requirement	2018 AMR Action / Monitoring Requirement
Review the impacts of the thresholds for Development Frameworks in future AMRs (p. 56)	
Planning Service to consider issuing guidance on the interpretation of Policies GP16(A) and GP16(B) in the future (p. 57)	
Offices	
Development & Planning Authority to liaise with the Committee for Economic Development and Policy & Resources Committee at an officer level in order to support further work that may arise from the implementation of the recently approved States' Economic Development Strategy, particularly on the monitoring of our economy (p. 60)	Development & Planning Authority to continue to liaise with the Committee *for* Economic Development and the Policy & Resources Committee at an officer level in order to support further work that may arise from the implementation of the recently approved States Economic Development Strategy, particularly on the monitoring of our economy (p. 60)
Review the approach for delivering the requirements of the office sector if the extant planning permission for the Office Expansion Area is implemented (p. 65)	
Review the need to prepare a Development Framework for the Office Expansion Area in the 2018 AMR (p. 65)	Development & Planning Authority to continue to monitor delivery of the office accommodation within the Office Expansion Area and review the need to prepare a Development Framework for the Office Expansion Area in 2019 (p. 65)
Continue to monitor the number of cases where applications for a use similar to office use are permitted as a minor departure to the IDP policies, reflecting the changing nature of businesses requiring office accommodation. If this rises, the Development & Planning Authority will need to reconsider whether an amendment to policy is required (p. 66)	Continue to monitor the number of cases where applications for a use similar to office use are permitted as a minor departure to the IDP policies, reflecting the changing nature of businesses requiring office accommodation. If this rises, the Development & Planning Authority will need to reconsider whether an amendment to policy is required (p. 66) Monitor the changing nature of business and appropriateness of use classes and policy (p. 66)
Development & Planning Authority to consult with industry on definitions for primary, secondary and tertiary accommodation and prepare assessment of portfolio against revised criteria if appropriate (p. 62)	Development & Planning Authority to liaise with the Committee *for* Economic Development at officer level and commercial agents and industry representatives to assess the recommended portfolio set out by the ELS

2017 AMR Action / Monitoring Requirement	2018 AMR Action / Monitoring Requirement
Development & Planning Authority to liaise with the Committee for Economic Development at officer level in order to engage with industry representatives on the criteria for assessment of quality and use in future analysis (p. 62)	(2014) together with other existing stock within the Main Centres against the criteria for quality. Further analysis of whether this is an appropriate range of accommodation to meet business needs can then be undertaken with the Committee *for* Economic Development. This research should then inform the 5 year review of employment land supply and any requirement to amend planning policies (p. 68)
Continue to monitor the supply of office premises bi-annually (p. 72)	
Monitor the subdivision, vacancy levels and availability to the market of large scale premises (p. 75)	Monitor the subdivision, vacancy levels and availability to the market of large scale premises (p. 75)
Development & Planning Authority at an officer and political level to seek / encourage delivery of new primary office accommodation in the development of Regeneration Areas and Harbour Action Areas that is adaptable to suit medium to large businesses (p. 75)	Development & Planning Authority at an officer and political level to seek / encourage delivery of new high quality office accomodation in the development of the Office Expansion Area, Regeneration Areas and Harbour Action Areas that is adaptable to suit a range of businesses (p. 75)
Industry, Storage & Distribution	
The Development & Planning Authority to liaise with the Committee for Economic Development and Policy & Resources Committee at an officer level in order to support further work that may arise from implementing the recently approved States' Economic Development Strategy, particularly on the monitoring of our economy (p. 80)	The Development & Planning Authority to continue to liaise with the Committee *for* Economic Development and Policy & Resources Committee at an officer level in order to support further work that may arise from implementing the approved States' Economic Development Strategy, particularly on the monitoring of our economy (p. 80)
The Development & Planning Authority to open up a regular dialogue with the Committee for Economic Development to discuss the needs of creative industries and other emerging sectors through creation of an officer level working group (p. 86)	The Development & Planning Authority to continue dialogue with the Committee *for* Economic Development to discuss the needs of creative industries and other emerging sectors through creation of an officer level working group (p. 86)
Continue to monitor supply of new development including the supply of States' land (p. 88)	Continue to incorporate the supply of States' owned land for such uses into monitoring (p. 88)
The Development & Planning Authority to work with the Committee for Economic	

2017 AMR Action / Monitoring Requirement	2018 AMR Action / Monitoring Requirement
Development at officer level to engage with industry representatives and agents to promote better awareness and understanding of policies for provision of all employment uses within the IDP, in particular focusing on those relevant to Outside of the Centres (p. 89)	
If the majority of development for industry storage and distribution uses continues to be located Outside of the Centres, further investigation into the operation of the relevant polices controlling development Outside of the Centres should be undertaken (p. 90)	Further investigation into the extent and nature of employment development occurring Outside of the Centres to ensure that policies continue to deliver the Spatial Strategy. This should form part of the scheduled 5 year employment land supply review (p. 90)
	The Development & Planning Authority should consider the impacts of increasing the threshold for exemptions from planning permission alongside a review of the full impact and benefits of the changes to the exemptions and the rationalisation of uses within the Use Class Ordinance, 2017 to inform the 5 year review of employment land supply (p. 91)
Continue to monitor availability within Key Industrial Areas both 'for sale' and 'for let' (p. 92)	Continue to monitor availability with Key Industrial Areas both 'for sale' and 'for let' (p. 92)
Visitor Accommodation	
The Development & Planning Authority to liaise with the Committee for Economic Development at both officer and political levels in the analysis of the implications of a change to IDP visitor accommodation policies introducing a more flexible approach (p. 101)	The Development & Authority to liaise with the Committee *for* Economic Development at both officer and political levels in the analysis of the implications of a potential change to IDP visitor accommodation policies introducing a more flexible approach (p. 101) The Development & Authority will liaise with the Committee *for* Economic Development at officer level to review the potential and need to amend the Supplementary Planning Guidance where this is possible within the context of the IDP policies (p. 101)
Trends in occupancy levels of visitor accommodation may be included in future AMRs depending on the outcome of the	Trends in occupancy levels of visitor accommodation may be included in future AMRs depending on the outcome of the

2017 AMR Action / Monitoring Requirement	2018 AMR Action / Monitoring Requirement
States' debate on the Tourism Strategy (p. 102)	States' debate on the Tourism Strategy (p. 102)
Social, Community, Leisure and Recreation	
Guidance to be published in order to provide further information on supporting evidence required for an application to change use away from social & community and leisure & recreation uses (p. 111)	
	Monitor the level of provision of public art in development approved for sites with Development Frameworks (p. 111)
	Further research is required to establish a detailed baseline of the current provision of social, community, leisure and recreation facilities throughout Guernsey and further dialogue with the C*f*ES&C and C*f*H&SC to establish levels of need and demand (p. 113)
	Development & Planning Authority to investigate options to talk to local communities in order to establish more qualitative data regarding social and community and leisure & recreation facilities in Guernsey (p. 114)
Main Centres	
Additional monitoring of footfall, building condition and opening hours as measures of vitality in Core Retail Areas (p. 123)	
Consideration of including detailed analysis of retail vacancies in future AMRs, if there is interest from other Committees (p. 123)	
Development & Planning Authority to continue to liaise at officer level with the Committee for Economic Development in connection with updating the Retail Study (p. 123)	The Development & Planning Authority to continue to liaise with the Committee *for* Economic Development at officer level in connection with updating the Retail Study and with regard to the emerging Retail Sector Policy Statement (p. 123)
Monitoring and reporting on additional factors relating to vitality and viability in the Regeneration Areas (p. 127)	Continued monitoring of factors relating to vitality and viability (p. 127)
Continued monitoring to ensure the Main Centre Inner Areas retain an appropriate mix of uses (p. 129)	Continued monitoring to ensure the Main Centre Inner Areas retain an appropriate mix of uses (p. 129)

2017 AMR Action / Monitoring Requirement	2018 AMR Action / Monitoring Requirement
	Continued monitoring to ensure the Main Centre Outer Areas retain an appropriate mix of uses (p. 132)
Liaise at officer level with the Committee for Economic Development and stakeholders, as well as reviewing other evidence, to identify the required stock of smaller office units (p. 129)	Continue to liaise at officer level with the Committee *for* Economic Development and stakeholders, as well as reviewing other evidence, to identify required stock of smaller office units (p. 129)
Close involvement with the development of proposals for the St Peter Port Harbour Action Area through representation on the Seafront Enhancement Area Steering Group and the officer level working group (p. 134)	Continued close involvement with the development of proposals for the Seafront Enhancement Area programme (p. 134) Continued monitoring of planning approvals within the Harbour Action Areas (p. 134)
Monitoring and reporting of relevant data relating to accessibility (p. 136)	
Local Centres	
Continue to undertake Local Centres survey and publish data annually (p. 140)	
Continued monitoring of general convenience store provision in Local Centres (p. 143)	Continued monitoring of general convenience store provision in Local Centres (p. 143)
Consideration of reviewing Les Capelles as a Local Centre at the time the IDP is reviewed (p. 143)	Consideration of reviewing Les Capelles as a Local Centre at the time the IDP is reviewed (p. 143)
Continue to monitor the mix and balance of uses in Local Centres (p. 150)	Continue to monitor the mix and balance of uses in Local Centres as part of the Local Centres Survey and publish data annually (p. 150)
Liaise with the Committee for Economic Development in connection with the provision of a comprehensive Retail Survey to include exploration of the relevant roles of Local Centres (p. 150)	Liaise with the Committee *for* Economic Development in connection with the provision of a comprehensive Retail Survey to include exploration of the relevant roles of Local Centres and the development of the Retail Sector Policy Statement (p. 150)
Undertake or commission Stage 2 of the Guernsey Character Study, including character studies of the Local Centres, to inform planning applications and monitoring (p. 151)	Undertake or commission Stage 2 of the Guernsey Character Study, including character studies of the Local Centres, to inform planning applications and monitoring (p. 152)
Continue to monitor the locational distribution of new dwellings and other development, as well as the number of	Continue to monitor the locational distribution of new dwellings and other development, as well as the number of

2017 AMR Action / Monitoring Requirement	2018 AMR Action / Monitoring Requirement
Development Frameworks coming forward in the Local Centres and population (p. 151)	Development Frameworks coming forward in the Local Centres and population trends (p. 152)
Liaise with the Committee for Health & Social Care in connection with Community Hubs (p. 153)	Continue to liaise with the Committee *for* Health & Social Care in connection with Community Hubs (p. 153)
Agriculture and Horticulture	
Publication of Supplementary Planning Guidance on applying for planning permission in the Agriculture Priority Area in order to assist applicants and agents (p. 161)	Publication of Supplementary Planning Guidance on applying for planning permission in the Agriculture Priority Area in order to assist applicants and agents (p. 162)
Investigate methods to obtain clearer data on the amount of agricultural, horticultural and undeveloped land within the Agriculture Priority Area (p. 161)	Analysis of the 2018 Habitat Survey data to provide comprehensive data on land use, including that within the APA, and including agricultural, horticultural and undeveloped land (p. 162)
Liaise with the Committee for the Environment & Infrastructure at officer level regarding agricultural land use requirements and aspirations of the agricultural industry (p. 169)	Continued liaison with the Committee *for the* Environment & Infrastructure at officer level regarding agricultural land use requirements and aspirations of the agricultural industry (p. 169)
Continued monitoring of applications outside the APA that relate to agricultural/open land and horticulture (p. 169)	Continued monitoring of planning applications outside the APA that relate to agricultural/open land and horticulture (p. 169) Continue to monitor approvals and refusals within the APA to identify trends and ensure that sufficient land remains available for agricultural use (p. 161)
Continued monitoring of extensions of domestic curtilage and the quality of new developments, noting residential amenity space (p. 169)	Continued monitoring of extensions of domestic curtilage and the quality of new developments, noting residential amenity space (indicators currently being devised) (p. 169) Consider review of wording of Policy GP15: Creation and Extension of Curtilage in relation to the issues raised by the Appeals Panel when the IDP is reviewed (p. 156) At the point of review of the IDP, consideration to be given to amending the wording of Policy GP1: Landscape Character

2017 AMR Action / Monitoring Requirement	2018 AMR Action / Monitoring Requirement
	and Open Land and GP15: Creation and Extension of Curtilage within the policy summaries section, to clarify the land management function of agriculture, to align this with the main policy texts (p. 169) At the point of review of the IDP, ensure that the wording of the policy summary of Policy GP15: Creation and Extension of Curtilage is clarified to align this with the main policy text where it relates to small parcels of land which are not visually prominent (p. 169)
Continued monitoring of changing needs of the dairy industry (including possible requirements to grow more fodder crops) (p. 172)	Continued monitoring of the changing needs of the dairy industry (including possible requirements to grow more grain and fodder crops) (p. 172)
Continued monitoring of land farmed by dairy farmers relative to APA designation, including any losses of tenanted agricultural land outside the APA (p. 172)	Continued monitoring of land farmed by dairy farmers relative to APA designation, including any losses of tenanted agricultural land outside the APA (p. 172)
Further analysis of the updated information on land farmed by dairy farmers (p. 172)	Continued analysis of mapping data showing dairy farmed land (p. 172) At the time of a full review of the IDP it is intended to combine 5 years information on land in active dairy farm use to inform an updated APA (p. 174)
Liaise with the Committee for Economic Development at officer level over horticultural issues as appropriate, but particularly in connection with the potential establishment of CBD businesses (p. 173)	That the Development & Planning Authority continues to liaise with the Committee *for* Economic Development at officer level over horticultural issues as appropriate, but particularly in connection with the potential establishment of CBD businesses as outlined above (p. 173)
Continued monitoring of the nature of applications relating to horticultural proposals (p. 173)	Continued monitoring of the nature of applications relating to horticultural proposals (p. 173)
Further analysis of the updated information on land farmed by dairy farmers and updated redundant glasshouse sites baseline relative to the Agriculture Priority Area designation (p. 175)	Continue to gather accurate data on factors affecting the APA designation (p. 175)

2017 AMR Action / Monitoring Requirement	2018 AMR Action / Monitoring Requirement
Redundant Glasshouse Sites	
To maintain and regularly update and refine the redundant glasshouse baseline (p. 178)	To maintain and regularly update and refine the redundant glasshouse baseline (p. 178) Liaison at staff level with the Committee *for the* Environment & Infrastructure regarding the identification of redundant glasshouse sites with particular biodiversity interest (p. 184)
Continued monitoring of planning permissions for change of use or redundant glasshouse sites (p. 184)	Continued monitoring of planning permissions for change of use of redundant glasshouse sites (p. 184)
Liaise with the Committee for the Environment & Infrastructure at an officer level in relation to the development of the Energy Plan and monitor any impacts this may potentially have on the number of planning applications relating to change of use of redundant glasshouse sites for renewable energy (Policy IP1) (p. 184)	The Development & Planning Authority to continue to liaise with the Committee *for the* Environment & Infrastructure at an officer level in relation to the development of the Energy Policy and to monitor any likely impacts this emerging policy may have on the number of planning applications relating to change of use of redundant glasshouse sites for renewable energy (Policy IP1) (p. 184)
Continued monitoring of the area of glass to be cleared to implement planning permissions (p. 185)	To continue to monitor the clearance of redundant glasshouse sites following planning permission to determine which sites have been cleared from the baseline as a result of planning permission being granted (p. 185)
Liaise with the Committee for Economic Development at an officer level with regards to information on the small number of commercial glasshouse operations and the level of resources allocated to the horticultural census (p. 185)	The Development & Planning Authority continue to liaise with the Committee *for* Economic Development at an officer and political level with regards to information on the small number of commercial glasshouse operations and the level of resources allocated to the horticultural census (p. 186)
Continued monitoring of planning applications relating to redundant glasshouse sites within and adjacent to the Agriculture Priority Area (p. 187)	Continued monitoring of planning applications relating to redundant glasshouse sites within and adjacent to the Agriculture Priorty Area (p. 188)
Continued monitoring of cleared glasshouse sites within and adjacent to the Agriculture Priority Area following the adoption of the	

2017 AMR Action / Monitoring Requirement	2018 AMR Action / Monitoring Requirement
IDP to establish if any of the cleared sites are contributing to agricultural land (p. 187)	
Natural Resources	
Review the findings of the Guernsey Habitat Survey 2020 when complete (p. 192)	Review the findings of Guernsey Habitat Survey when complete (p. 192)
Initiate the project to produce Supplementary Planning Guidance for the whole or part of each Site of Special Significance (p. 195)	Progress the project to produce Supplementary Planning Guidance for the whole or part of each Site of Special Significance (p. 195)
Survey the Areas of Biodiversity Importance other than the Foreshore and those Areas associated with a Site of Special Significance and identify and new Areas of Biodiversity Importance (p. 197)	Survey the Areas of Biodiversity Importance other than the Foreshore and those Areas associated with a Site of Special Significance and identify any new Areas of Biodiversity Importance (p. 197)
Planning Service to monitor the use of Sustainable Urban Drainage Systems on larger developments approved under the IDP – those relating to sites with a Development Framework (p. 201)	Monitor the use of Sustainable Urban Drainage Systems on larger developments approved under the IDP – those relating to sites with a Development Framework (p. 201)
Planning Service to work with Guernsey Water / States Trading Supervisory Board on the Surface Water Management Strategy to review the approach to requirements for Sustainable Urban Drainage Systems. Then review the Island Development Plan approach in the 2018 Annual Monitoring Report (p. 202)	Planning Service to liaise with Guernsey Water to review the design of new development to help ensure that development does not further reduce the capacity of the drainage systems to deal with climate change (p. 202)
Development & Planning Authority to liaise with the Committee for the Environment & Infrastructure at an officer and political level to promote the use of renewable energy equipment and infrastructure in accordance with Policy GP9 and IP1 as part of development of the Energy Policy (p. 204)	Development & Planning Authority to liaise with the Committee *for the* Environment & Infrastructure at an officer and political level to promote the use of renewable energy equipment and infrastructure in accordance with Policy GP9 and IP1 as part of development of the Energy Policy (p. 204)
Construction Waste	
Monitoring the type and scale of developments requiring a Site Waste Management Plan to ensure the threshold is at an appropriate level (p. 212)	Continued monitoring of the type and scale of developments requiring a Site Waste Management Plan to ensure the threshold is at an appropriate level (p. 212)
Continue monitoring the proportion of residential planning applications requiring the submission of a Site Waste Management Plan to ensure the threshold is set an appropriate level (p. 214)	Continue monitoring of the proportion of residential planning applications requiring the submission of a Site Waste Management Plan to ensure the threshold is set at an appropriate level (p. 214)

2017 AMR Action / Monitoring Requirement	2018 AMR Action / Monitoring Requirement
Monitoring of post completion submissions and analysis against baseline figures to ensure what materials are successfully reused, recycled and minimised and identify barriers (p. 214)	Monitoring of post completion submissions and analysis against baseline figures to determine which materials are successfully reused, recycled and minimised and to identify any barriers (p. 215) Continue to monitor the effectiveness of the Site Waste Management Plans Planning Advice Note and continue to seek feedback from stakeholders (p. 215) Provide internal guidance for Development Control Officers to outline the information that is expected to be provided within a Site Waste Management Plan (p. 215) Secondary review of the Site Waste Management Plans Planning Advice Note following the completion of internal guidance (p. 215)
Regular engagement with the Construction Industry Forum in regards to Site Waste Management Plans in order to monitor their effectiveness in delivering the requirements of the Island Development Plan policies (p. 216)	Continued regular engagement with the Construction Industry Forum in regards to Site Waste Management Plans in order to monitor their effectiveness in delivering the requirements of the Island Development Plan policies (p. 216)
Built Heritage and New Development	
Complete Project Plan for Conservation Area Character Appraisals and implement work-steam in accordance with Project Plan. Priority should be given to those Conservation Areas where this is likely to be significant development pressure in the short and medium term and that will help deliver the social and economic aims of the States of Guernsey: The areas of St Peter Port are HAA/SEA, Regeneration Areas, Housing Allocations and windfall sites that are large enough to generate a Development Framework; Delancey Conservation Area; St Martin's Church and Sausmarez Manor Conservation Area (p. 222)	Implement Conservation Area Character Appraisals work-steam in accordance with Project Plan. Priority will be given to those Conservation Areas where there is likely to be significant development in the short to medium term that will help deliver the social and economic aims of the States of Guernsey: 1 - The areas of St Peter Port where there is likely to be significant development – HAA/SEA, Regeneration Areas, Housing Allocations and windfall sites that are large enough to generate a Development Framework (expected to start Q2 2018 and completed Q1 2020); 2 - The Bridge; 3 - Delancey Conservation Area; and, 4 - St Martin's Church and Sausmarez Manor Conservation Area (p. 222)

2017 AMR Action / Monitoring Requirement	2018 AMR Action / Monitoring Requirement
	Whilst producing CACA's monitor the cumulative effect of minor development on the particular character and appearance of that Conservation Area (p. 223)
Monitor decisions on planning applications for Protected Buildings in order to establish if any Protected Buildings are removed from the list as a result of planning permission being implemented (p. 226)	Continue to monitor decisions on planning applications for Protected Buildings in order to establish if any protected Buildings are removed from the list as a result of planning permission being implemented (p. 226) Continue to monitor if planning permission has been granted and implemented that would result in that protected being removed from the protected monuments list (p. 231)
Over 2018 provide a robust baseline by surveying the overall condition and occupancy of all Protected Buildings (p. 228)	Over 2019 work with owners of Protected Buildings is very poor condition to prevent their further deterioration. Give priority to Protected Buildings that are also vacant (p. 228) Over 2019 work with owners of vacant Protected Buildings to bring them back into use. Prioritise Protected Buildings that are also in very poor condition (p. 228) Issue Preservation Notices for Protected Buildings where informal means to improve the condition of the building have not been successful (p. 229)
Over 2018, the methodology and indicators for assessing the quality of new development will be drafted and consulted on with key stakeholders (p. 233)	Over 2020 the methodology and indicators for assessing the quality of new development will be consulted on with key stakeholders (p. 233)
Public and Private Parking	
Liaise with the Committee for the Environment & Infrastructure at an officer and political level to consider the role and effectiveness of the Island Development Plan in supporting the aims of the Integrated Transport Strategy and to review the implications for the Island Development	Development & Planning Authority to liaise with the Committee *for the* Environment & Infrastructure at an officer and political level to consider the role and effectiveness of the Island Development Plan in supporting the aims of the Integrated Transport Strategy and to review the implications for the Island Development

SUMMARY OF ACTIONS AND FURTHER MONITORING REQUIREMENTS

2017 AMR Action / Monitoring Requirement	2018 AMR Action / Monitoring Requirement
Plan of any changes to the Integrated on Island Transport Strategy (p. 238)	Plan of any changes to the Integrated Transport Strategy (p. 238) Development & Planning Authority to liaise with the Committee *for the* Environment & Infrastructure at an officer level to facilitate implementation of individual elements of the Integrated Transport Strategy such as travel plans, access plans and measures to encourage active travel (p. 238)
The level of provision and use of public parking in the Main Centres will be monitored in future Annual Monitoring Reports, with assistance from the Committee for the Environment & Infrastructure (p. 241)	The level of provision and use of public parking in the Main Centres will be monitored in future Annual Monitoring Reports, with assistance from the Committee *for the* Environment & Infrastructure (p. 241)
Add clarification to the Supplementary Planning Guidance regarding additional parking space within the curtilage and definitions of private and communal parking (p. 245)	Add clarification to the Supplementary Planning Guidance regarding definitions of private and communal parking (p. 245)

CONTACT US

Contact Us for further information and advice at: Planning Service, Sir Charles Frossard House, St Peter Port. GY1 1FH Telephone 01481 717200 Email planning@gov.gg

Have you visited our website? Go to www.gov.gg/planningandbuilding for additional information on the Island Development Plan, Supplementary Planning Guidance (including Development Frameworks) and Quarterly Monitoring Reports.

This monitoring report is issued by the Development & Planning Authority for information only. It does not form part of the Island Development Plan (2016). The Development & Planning Authority does not accept any liability for loss, or expense, arising out of the provision of, or reliance on, any information given. You are recommended to seek advice from an independent professional advisor where appropriate.

Copies of the text of the Island Development Plan (2016) are available from Sir Charles Frossard House. Copies of legislation are available from the Greffe. Electronic copies are also available at www.guernseylegalresources.gg

Appendix 1:

Consultation with other States Committees

Development &
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14 December 2018

Dear Deputy Parkinson,

Island Development Plan – Annual Monitoring Report, 2018

The Land Planning and Development (Guernsey) Law, 2005
The Land Planning and Development (Plans) Ordinance, 2007

As you will be aware, the Island Development Plan (IDP) contains the current planning policy framework for Guernsey and was adopted in November 2016. The Development & Planning Authority (D&PA) has a statutory obligation to keep the Island Development Plan under review. To do this the D&PA requires expert information and data from relevant Committees in order to monitor the effectiveness of the Plan's policies. A framework for monitoring the IDP is set out in the IDP that includes both quarterly and annual monitoring reports. This is the mechanism for the D&PA to fulfil its mandate and legal obligation to ensure the IDP is fit for purpose and up-to-date.

The D&PA intends to publish the Island Development Plan Annual Monitoring Report for 2018 as soon as practical in 2019. The IDP establishes that the annual monitoring reports will include feedback from stakeholders and will set out actions to address any issues where the monitoring process reveals that changes are needed to the Plan, or any guidance is needed for clarification or any other action is needed by the States. This enables the Island Development Plan to maintain sufficient flexibility to adapt to changing circumstances.

This is an opportunity for your Committee to comment in relation to its mandate, supported by evidence where necessary, on the effectiveness of the planning policies introduced by the Island Development Plan. The D&PA is also requesting some information from your Committee to help assess the situation and ensure the Island Development Plan remains effective and relevant.

We would be grateful for your views on any issue relating to the Island Development Plan. This could include, for example:

- any comments on specific objectives or policies and their continued relevance; and,
- any comments in relation to how the IDP has influenced any development proposals that your Committee has an interest in.

In addition, we would be grateful for:

- information on any reports published since the start of the 2018 – please provide a copy or a link to the document;
- any other information or data that could be relevant that your Committee could share with the D&PA;
- whether there is an interest from your Committee in the production of data by the Planning Service regarding retail vacancies in the Main Centre – to be produced on an annual basis as part of the Main Centres Survey;
- an update on progress with the tourism strategy;
- information regarding your Committee's position paper on renewable energy;
- information regarding your Committee's retail sector policy statement;
- updates to visitor accommodation data provided for the 2017 AMR including for staying visitors, the stock of accommodation and vacant current stock; and,
- visitor accommodation occupancy levels data, if available.

The 2017 AMR contains actions to address the issues identified as a result of monitoring in 2017. These actions include a number where the Authority is seeking liaison between Committees at a political level and / or officer level to assist with delivering projects or monitoring. In relation to your Committee this includes:

- liaison at officer and political level in the analysis of the implications of a change to IDP visitor accommodation policies introducing a more flexible approach;
- liaison at officer level in relation to how policies can support the implementation of the Economic Development Strategy;
- liaison at officer level to support engagement with industry representatives on the criteria for assessment of quality and use of offices in future analysis;
- liaison at officer level to discuss the needs of creative industries and other emerging sectors;
- liaison at officer level to engage with industry representatives and agents to promote better awareness and understanding of policies for provision of all employment uses within the IDP, in particular focusing on those relevant to Outside of the Centres;
- liaison at officer level in relation to updating the retail study and in the provision of a comprehensive Retail Survey to include exploration of the relevant roles of Local Centres;
- liaison at officer level (and with stakeholders, as well as reviewing other evidence) to identify the required stock of smaller office units;
- liaison at officer level over horticultural issues as appropriate, but particularly in connection with the potential establishment of CBD businesses; and,
- liaison at officer level with regards to information on the small number of commercial glasshouse operations and the level of resources allocated to the horticultural census.

Officers do already liaise on a number of issues of common interest and I would appreciate your Committee's continued support so that these actions can be addressed in due course.

The Island Development Plan and associated documents, including the 2017 Annual Monitoring Report, can be found here www.gov.gg/planningpolicy

I would be very grateful if you could send any comments that you may have by email to planreview@gov.gg or in writing to the D&PA by 5pm on **28th February, 2019**.

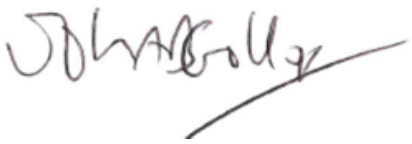
The feedback received will be reviewed and included in the Annual Monitoring Report as appropriate with a D&PA response if required. If you do not want any of the information you provide to be published, please let the Planning Service know.

I would also be grateful if you could confirm that your Committee agrees to the inclusion of your response to this letter in the Annual Monitoring Report, 2018, as part of an appendix, as was the case with the 2017 report.

The Forward Planning team in the Planning Service can assist with any queries. Please contact Ewan Taylor, Forward Planning Officer, in the first instance (ewan.taylor@gov.gg or tel. 677 2540).

Thank you in advance for taking the time to provide feedback.

Yours sincerely,



Deputy John Gollop
President, Development & Planning Authority

Committee *for* Economic Development

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26 March 2019

Dear Deputy Gollop

Island Development Plan – Annual Monitoring Report, 2018
Comments from the Committee *for* Economic Development

Thank you for your letter of 14 December 2018, which invited the Committee to contribute to the work of the Development & Planning Authority ("DPA") to assess the effectiveness and performance of the Island Development Plan ("IDP"). The Committee appreciates the ability to be able to provide feedback to this process, to ensure the IDP continues to be fit for purpose, by reflecting the land and accommodation needs of the island business community.

As part of the development of the Annual Monitoring Report for 2017, the Committee provided a number of comments in the following areas: industrial and storage & distribution premises, office accommodation, visitor accommodation, retail and horticulture. Our original letter, dated 16 May 2018, is attached for information as "Appendix 1". We would subsequently like to provide you with a further update on each of these key areas, outlining the main outcomes over the past year. In so doing, we will also undertake to provide responses to the specific information requests outlined in your letter.

In terms of our general thoughts, the Committee believes that the IDP continues to be functioning well for the island's needs. The Committee would, however, like to see additional resources being allocated to the preparation of Local Planning Briefs and Development Frameworks, and this will become of increasing importance as work commences on revitalising the Harbour Action and Regeneration Areas. The Committee would therefore be grateful if the DPA could provide further information on how the Committee could go about making an economic case for this additional resource.

It should also be noted that since our last submission, the States subsequently approved the Committee's Economic Development Strategy in June 2018, which contains a number of

workstreams to strengthen existing business sectors and to diversify Guernsey's economy into other avenues. A link to the Strategy can be found here: https://www.gov.gg/article/165359/Economic-Development-Strategy-to-build-on-strengths-of-Guernseys-economy-and-encourage-diversification . These projects are likely to encompass a number of different accommodation and infrastructure needs, and so the Committee will endeavour to engage with the DPA as and when further progress is made. In November 2018, these projects were assigned differing levels of priority according to the categories of "critical", "important" and "beneficial". This subsequently impacts upon our ability to carry out work in certain areas, including the collation of data for IDP monitoring purposes.

Industrial and Storage & Distribution Premises

While the Committee has no major updates to provide in respect of 2018, it does note developments in this area in recent months. On 5 March 2019, two officers were able to attend a Planning Service-led workshop with commercial property agents and industry representatives which sought to gather attendees' views on current and future requirements for industry and storage premises (as well as offices). The discussion was wide ranging, but the Committee wish to draw particular attention to the following matters:

- There was a consensus that the manufacturing and industrial sector is unlikely to grow significantly in the future and should be concentrated in the previously identified Key Industrial Areas ("KIAs"). As such, it was suggested that there should be room for greater leeway in allowing more former industrial units to be converted to other uses.

- Equally, there was some frustration expressed that greater flexibility was not present in enabling certain types of storage accommodation, such as old warehouses, to be utilised for other functions. Attendees indicated that interest had been shown in these units for the purpose of trade counters and car showrooms but that this was only permitted if it was an ancillary function to the main use of the building.

- It was noted that there were several upcoming States projects that were likely to lead to changes in industrial accommodation requirements in the coming years. This includes the delivery of the Hydrocarbon Supply Programme and Energy Policy.

The Committee recognises the benefits of further data collection in order to provide more accurate and evidence based recommendations on industrial and storage accommodation requirements, as well as in other areas. However, the Committee will continue to be mainly engaged with the higher priorities identified by the Economic Development Strategy. In addition, there are currently insufficient resources available within P&R for this work to be further progressed. Nevertheless, it is an area which the Committee will continue to review in the future as and when time and resources allow.

Office Accommodation

As with industrial and storage and distribution premises, office accommodation was one of the main areas addressed at the recent workshop held with Planning Services on 5 March 2019. There were a number of matters of note that are worth mentioning:

- Attendees were asked to identify what they believed to be the key factors when determining the quality of office accommodation and whether it should be categorised as primary, secondary or tertiary. In general, the importance of St Peter Port as a centre of commerce and the benefits of offices being located near support services and existing clusters was recognised, thereby supporting the IDP's policy of office development around the Main Centres. However, even greater emphasis was laid on the on-site/private provision and nearby public provision of car parking facilities, with delegates stating that this was more important than location when determining the quality of office accommodation.

  The Committee wishes to work with the DPA to look at all potential options for meeting the access and parking aspirations of office users, while also ensuring that this does not adversely affect other economic activities in the areas concerned. It is considered that the St Peter Port Harbour Action Area, being progressed by the Seafront Enhancement Area Steering Group, provides opportunities to successfully address access, parking and overall physical enhancement issues.

- While the Committee continues to support Policy MC4(A), which warrants that smaller office space under 250m^2 and/or offices that cannot easily be refurbished to meet modern needs can be repurposed for other uses, it was noted in the workshop that there are examples of offices which are of a high quality despite being small in area. The Committee considers that while these units may not be suitable for some of the larger operators within the finance sector, they could prove to be ideal for future growth sectors in the island. Therefore the IDP should strike a balance between enabling sufficient flexibility in change of use while also protecting prime office space.

- There continues to be a shortfall in high quality "primary" office stock, which has been compounded by the fact that the Admiral Park Office expansion area has not, as yet, been developed. Comment was also made that it is not always possible to increase stock levels by refurbishing secondary accommodation, as often the floor to ceiling heights are restrictive and unable to be altered without rebuilding the accommodation. There does, therefore, seem to be some discrepancy between this view and the current definitions of quality identified within the IDP. However, we are conscious that emerging wireless technology and working practices (for instance 5G and cloud computing) may lead to there being less need for physical hard wiring of offices and that this could lead to changes in demand for certain types of office building designs. As a result there may be greater potential to utilise offices with smaller floor to ceiling heights which can't easily accommodate underfloor wiring.

- Following on from a report recently commissioned by D2 Real Estates, it is recognised that there is an excess in supply of poor quality office space no longer fit for purpose

that could be converted to other uses, particularly residential, without having a significant impact on the health of our office stock. The Committee therefore recommends that the IDP continues to ensure that flexibility exists to allow this to happen as smoothly as possible.

- Attendees concluded that it was important that offices be purpose built, with the flexibility to be converted to multiple different uses. This relates to discussions that took place on the future requirements of office accommodation, including the need to have a variety of workspaces such as hot-desking and breakout areas and the ability to adapt to emerging industries like the creative sector which might have different requirements to the traditional office space.

The Committee is mindful of the fact that the workshop did not represent all views within the industry, in terms of both offices and industrial and storage/distribution accommodation, but it does provide an indication of some of the factors being raised that should be taken into account by the DPA as part of the annual monitoring process of the IDP. In addition, the Committee understands, following the receipt of industry representation, that there is a shortage of offices benefiting from sea views, a feature which would make them attractive to some businesses. This point was corroborated by the findings of the workshop. The Committee therefore recognises that offices with sea views could be attractive to new businesses and existing firms that are looking to upgrade and relocate and would support the development of such accommodation under the IDP.

As part of our efforts to enable better data-gathering, the Committee has also commissioned an industry survey to better understand the needs of industry in terms of what they require from office space going forward. The results of this will be shared with the DPA and will help form the basis of future submissions to the AMR. These submissions will also be shaped by industry trends and the changing requirements for workspace, something which the Committee will continue to monitor.

Visitor Accommodation

The content published in the AMR 2017 included comment on the revised Tourism Strategy and the potential economic benefits of adopting a more flexible approach. This concluded with the statement "The implications for the policies of the Island Development Plan of the propositions in the Committee *for* Economic Development's policy letter will be considered once it has been debated by the States."

This policy letter has yet to be finalised and Marketing & Tourism has been advised by officers of the DPA that the most likely opportunity for revising the policies of the IDP to take account of any implications of the new Tourism Strategy, when it has been approved, will be at the scheduled mid-term review of the Plan.

Marketing & Tourism continues to work with stakeholders to explore the potential viability of ideas that might lead to a more "flexible" approach to change of use, both away from and into the visitor accommodation sector. Whilst some of the many ideas mooted have fallen out of consideration as inequitable, impractical or unworkable, this work has identified one mechanism that could facilitate a more pragmatic and flexible approach to a range of

applications. Modification of the Supplementary Planning Guidance published in relation to applications for change of use of visitor accommodation could encompass a new approach to the consideration of viability matters in certain instances. The Guidance interprets how an applicant may go about meeting the requirements of the policy criteria, and clearly any modifications would still need to be compliant with the overall aims of the Plan, and of the policies.

In the meantime, ongoing enquiries from potential investors in the sector continue to propose ideas for new, alternative and sometimes radical tourism accommodation products that have been launched successfully in other jurisdictions. These indicate not only a potential appetite for investment, but also that the increased flexibility necessary for them to come to fruition requires a more holistic approach from the States and not one solely based on planning or tourism considerations.

A separate discussion, regarding the extent of the period allowable for the use of private dwellings to accommodate visitors under a permit granted by the Committee *for* Economic Development, has resulted in the publication of more flexible guidelines for that activity by the DPA.

In addition, following on from the information supplied as part of the Committee's submission to the AMR in 2017, figures have also been provided for the following areas (attached as Appendix 2):

- Staying visitor numbers
- Inactive visitor accommodation sites at the end of 2018
- Breakdown of small accommodation businesses
- Total bed stock at the end of 2018.

Retail

Following on from the carrying out of a consumer retail survey and engagement with retail representatives in 2017, the Committee has now prepared a draft Retail Sector Policy Statement on which consultation is taking place with the aim of setting up a representative body to encompass the views and needs of the retail industry. The statement sets out four key objectives which the government will fulfil in supporting the retail sector, with the most relevant to the IDP being Objective C, which is to "Ensure a favourable trading environment for on-island (i.e. physical) retailing activities". Part of this involves recognises the potential of the Seafront Enhancement Area work to create new retail outlets/facilities and to improve access to retail areas, particularly in the Main Centres. This includes increasing access to parking facilities for town users while avoiding potential negative encroachment on other economic activities.

In addition, the Statement recognises that supporting the Main Centres does not just involve helping shopping outlets, but also encouraging a mix of uses in current retail areas. This includes places such as the area around Mill Street and Mansell Street, which could

encompass a mixture of land uses such as residential accommodation and hospitality, with some retail units continuing to be retained where the market considers it appropriate to do so. This has the potential to improve the vibrancy of these areas by enabling more people to live in close proximity, thereby having a positive effect on footfall for the retail sector as well as other service industry outlets.

In terms of the DPA's proposal to collect more data on retail vacancies as part of the Main Centres Survey, the Committee views any additional statistics on retail to be of great value. In addition, it is hoped that upon the setting up of an official retail body, this body will come to take on a greater role in the monitoring of the provision of retail space as well as the health of the sector as a whole.

Horticulture

In our previous submission to the AMR, it was noted that both the Committee and the Committee *for* Health and Social Care ("CfHSC") had received a number of enquiries from businesses interested in producing medicinal cannabinoid ("CBD") products, including the growth of cannabis under licence, which may have a future impact on the level of demand for and specifications of horticultural premises. Since this time, the Committee has continued to receive many enquiries from interested parties and a licensing regime has formally been put in place by the CfHSC, with the first licence having already been granted. While we cannot yet be sure to what degree this will be taken up, it is likely that these developments will have an impact on what is required from the stock of horticulture sites and on the IDP itself, including Policy OC6 which concerns proposals for works to existing glasshouse sites.

In addition, the Committee recognises the economic potential of processing sites for the conversion of cannabis crops into CBD and medicinal products and hopes that the IDP will allow for sufficient flexibility when considering applications for these to be built. To ensure maximum viability for the business, these processing facilities would need to be built on the same site on which the product is grown.

The Committee is also continuing to engage with the Committee *for the* Environment & Infrastructure ("CfE&I") regarding future joint working to develop renewable energy infrastructure, although discussions are still in the early stages. In addition, renewable energy is also being encompassed in the Committee's work to develop the island's "blue economy", which is in currently in the scoping phase. As and when work on these areas progresses, further consideration will need to be given to what the island's infrastructure needs will be and how this fits in with current planning policy, at which point the Committee will look to further communicate with the DPA.

I hope that the above answers your questions and provides a useful summary of the Committee's current position on the IDP. If you have further questions, please feel free to get in touch with our staff officers who will be happy to assist.

Yours sincerely

Deputy Charles Parkinson
President
Committee *for* Economic Development

Appendix 1

Committee *for* Economic Development

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16 May 2018

Dear Deputy Gollop

Island Development Plan – Annual Monitoring Report, 2017
Comments from the Committee *for* Economic Development

Thank you for your letter of 23 March 2018, which invited the Committee to contribute to the work of the Development & Planning Authority ("DPA") to assess the effectiveness and performance of the Island Development Plan ("IDP"). The Committee recognises the value of monitoring the effectiveness of these policies and is grateful to the DPA for the opportunity to contribute to this process, to ensure the IDP continues to be fit for purpose.

As requested, the Committee has considered the land planning requirements in which it has an interest and wishes to submit the following comments to the DPA for consideration.

Overall, the Committee perceives that the IDP appears to be functioning adequately, although it is of the view that some of the policies may need time to fully bed in before the intended policy outcomes can be achieved. In particular the Committee recognises the significant opportunities presented by the Harbour Action Areas and Regeneration Areas designated in the IDP, and is keen that these opportunities are realised. The Committee notes that the IDP incorporates mechanisms through which the development of these areas may be brought forward (Development Frameworks and Local Planning Briefs), but it remains to be seen whether these can be achieved within a reasonable timeframe. The Committee would welcome the opportunity to work with the DPA to facilitate the unlocking of the St Peter Port Harbour Action Area ("StPP HAA"), and also the Regeneration Areas, as a matter of priority.

In respect of all employment sectors, your letter requested that the Committee considers ways of gaining wider feedback from businesses and that data collection is undertaken on an

annual basis to enable analysis of trends. The Committee recognises that data of that type would enable the provision of a more evidence-based response to future requests for information, as well as being of use to the Committee in the course of drafting policy. The Committee is not currently resourced to undertake this work, however officers are working with colleagues in Data & Analysis to establish how the Committee may access a greater range of data relating to planning matters and wider economic conditions. The Committee is of the view that it is beneficial to have a single data collection point which may be accessed by any interested service area within the States, and is therefore working collaboratively with the Data & Analysis team to identify options for how this may be achieved in respect of data required by the Committee.

Industrial and Storage & Distribution Premises

In February 2018, the States considered a Policy Letter submitted by the Committee and made Resolutions directing the States' Trading Supervisory Board to make available certain areas of land owned by the States of Guernsey for industrial and storage purposes. The Committee notes that it was possible for these sites to be put forward for this use (subject to the details of any application) without requiring any departure from the IDP policies, and the Committee is pleased that the relevant planning policies were flexible enough to allow this. The Committee understands that there have also been a number of applications for new industrial premises on redundant glasshouse sites on private land and that one such site has since been granted planning permission. As a matter of principle, the Committee would continue to support policy provision to enable the change of use of redundant glasshouse sites to appropriate forms of commercial activity.

The Committee undertook a survey of businesses requiring land for industrial, storage & distribution uses in 2017 (as shared at the time with officers of the Planning Service). The Committee would wish to draw attention to the following findings, although it should be noted that the survey, which was sent directly to over 580 businesses identified as requiring these premises types and publicised in the local media, may not be representative of the needs of all such business types as only 56 complete responses were received.

Paragraph 7.2.4 of the IDP states that there is an over-provision of industrial and storage & distribution space on island, and seeks to reduce the total area of such land. The Committee recognises that due to a decline in the size of the sectors which traditionally require industrial premises, the aggregate level of demand for industrial premises is likely to be reduced. However, the Employment Land Study (2014) acknowledged that a number of barriers appear to exist for industrial businesses seeking suitable premises, meaning that whilst there may indeed be an oversupply of industrial as well as storage & distribution premises, businesses seeking industrial premises may find it more difficult to find sites which meet the needs of modern light industry. The Committee's survey findings suggested that the industrial premises available are often too big (and therefore too expensive) for the requirements of the small businesses which make up the majority of the manufacturing and construction sectors, and too difficult or costly to sub-divide.

With this in mind, as a matter of principle the Committee would support the redevelopment of underutilised or vacant storage premises to provide suitable accommodation for businesses requiring industrial premises. The Committee recognises that the IDP policies are generally supportive of the change of use of storage & distribution sites to industry (and vice

versa), with additional flexibility provided by the permitted changes set out in the new Use Classes Ordinance, facilitating changes between storage and light industry on smaller premises (up to 250m^2) without requiring planning permission. The Committee is pleased to note that the IDP quarterly monitoring reports indicate that permissions were granted for the change of use of a number of sites to light industry during 2017, resulting in a net increase of 0.98ha of industrial premises.

The responses to the survey supported the view that there is a lack of open storage sites and sites suitable for heavy or specialist industrial activity. The Committee acknowledges that the Longue Hougue Key Industrial Area is reserved specifically for heavy or specialist industrial activity. However, as set out in the Committee's Policy Letter in respect of Land for Industrial and Storage Uses, wider provision of land for heavy or specialist industry appears to be required, which may not easily be delivered within the private sector given the potential negative impact of these activities on neighbouring uses. With regards to open storage sites, the Committee understands that the IDP policies would allow for suitable premises to be brought forward within the private sector in time, but at present there is an issue of availability of land (as opposed to built premises) for open storage use. The Committee is pleased that the States has sought to address the need for open storage sites as well as sites for heavy or specialist industry through its Resolution to provide land for these purposes. At this stage, however, it is too early to assess the impact of that provision.

Office Accommodation

As acknowledged in your letter, officers from Business, Innovation & Skills attended a recent workshop with commercial property agents, led by the Planning Service. The workshop (on 6 March 2018) sought the attendees' views on the market for office, industry and storage premises. The Planning Service is perhaps best placed to report on the content of that workshop, as the Committee has not tested the comments made to verify if the IDP already provides for the stated requirements. However, the Committee would wish to draw particular attention to the following matters which arose from the discussion in respect of office accommodation:

- There is a need for improvement in the overall quality of Guernsey's office stock, to ensure that the office accommodation available meets modern business needs. The construction of new, high quality office stock would improve the business offering and enable the existing stock of lower-grade office accommodation in the Main Centres to be put to other employment-related uses or to provide residential accommodation. The Committee notes that Policy MC4(A) enables the redevelopment of smaller office space and/or offices that cannot easily be refurbished to meet modern needs, and would continue to support that policy position. However, it is important to ensure that any clearance of lower grade office accommodation from the market is adequately compensated by the development of new office premises and does not result in a shortfall in required stock.

- The findings of the workshop appeared to support the stance described in section 7.1.7 of the IDP, that new offices are best located in or around existing office clusters with good access to supporting services, and the Committee would support this view. The majority of provision for new office development is made at the Admiral Park Office Expansion Area. Feedback from the workshop indicated that the site could be

further enhanced by the creation of appropriate 'networking spaces', to provide for modern ways of working other than fixed desk-bound working. The Committee notes that Policy MC4(B) allows for incidental and complementary uses within this Office Expansion Area.

- The IDP supports the development of new and more appropriate office stock in Main Centres, and the workshop feedback suggested that businesses do value the central location and amenities provided by Town. The Committee recognises the value of St Peter Port as the centre of island commerce across a number of sectors, and is therefore keen that the StPP HAA is able to deliver the potential for a cluster of office and complementary accommodation in a central town location. To this end, the Committee is working with other areas of the States to bring this work forward, as prioritised by the Policy & Resource Plan, and would wish for this to be given the highest priority to enable the realisation of the development potential as soon as possible.

- The Committee recognises that the creative industries sector is growing in economic importance and is pleased that the IDP allows flexibility for creative businesses to be located in industrial premises, including within Key Industrial Areas where appropriate, as well as in office premises elsewhere. However, the Committee would wish to emphasise that as these industries are emerging, it will be important that the policies of the IDP are flexible enough to accommodate the premises needs of these types of businesses as they become clearer. The Committee would therefore like to open up a regular dialogue with the DPA to discuss these needs in more detail as they emerge.

- The importance of adequate car parking, both in terms of on-site/private provision and nearby public provision, was frequently stated as a factor in the attractiveness of office accommodation and the recruitment of staff, in particular part-time staff. The Committee understands that the StPP HAA offers the opportunity to consider the appropriate provision of parking and alternative ways to access town. The Committee would wish to ensure that the needs of office-based businesses in town, as well as the needs of other sectors such as retail and hospitality, are taken into consideration during the development of plans for that area.

In the course of engagements with industry it has also been recognised that issues have been raised which indicate some misunderstanding about what is permissible using the IDP policies. There may therefore be an opportunity for the Committee to work with the DPA to promote development, by ensuring that there is a wider understanding of what may be achieved. The Committee would be keen to understand if this may be something which the DPA would support.

Visitor Accommodation

The Committee is pleased to note that policy OC8(B) concerning the development of campsites has enabled several new initiatives to progress in this area. This includes works to existing campsites, as well as interest in developing new camping and 'glamping' sites, with a proposal for one such 'glamping' site receiving full planning permission in February 2018.

The policies of the IDP, in respect of visitor accommodation in all areas of the island, offer limited opportunities for existing visitor accommodation sites to change to an alternative use, a position which took into account past consultations with the then Commerce & Employment Department. The Committee has since undertaken a review of Guernsey's tourism product, which provides important information for shaping the policy approach to visitor accommodation. The Committee is keen to further investigate the potential economic benefits of adopting a more flexible approach to the change of use of sites to and from visitor accommodation use, but recognises that these must be considered alongside other potential impacts of any proposed policy revision. As directed by the States, the Committee will submit a revised Tourism Strategy to the States later in 2018, which will provide an opportunity to review the appropriateness of these policies.

The Committee, through the Marketing & Tourism service area, is able to extract the following data on demand:

- Detailed records of current active visitor accommodation premises *(those sites operating under permits granted by the Committee)*
- Grading information and quality awards currently relating to those sites
- Number of rooms/units assigned as visitor accommodation by the permit applicant *(room/unit stock)*
- The maximum number of visitors to be accommodated at each site *(bed stock)*
- Historic accommodation stock records *(over the last 50-60 years)*
- Vacant establishments
- Trends in historic occupancy levels
- Projected occupancy trends

In addition, trends in visitor numbers are published by Marketing & Tourism on a quarterly basis, using statistically representative data from the passenger exit survey. The Committee would be pleased to provide the DPA with the above data required to form a baseline of the current stock of visitor accommodation, and would ask that the Planning Service liaise with Marketing & Tourism at officer level to arrange the production of the appropriate reports.

Retail

The Committee recently published the results of a comprehensive retail survey which sought to understand more about consumers' retail needs and preferences, the findings of which have been shared with the Planning Service at officer-level and are enclosed for completeness. The survey included a number of questions which were designed to assess whether the current planning policies allowed consumers to access the types of retail they need in the locations where they prefer to shop.

The survey findings indicated that, broadly speaking, the current land use policies in respect of retail appropriately reflect consumer needs. The findings support the spatial policy to concentrate the majority of new development in the Main Centres and the Main Centre Outer Areas to maintain the vitality of these areas, and to make provision for limited development in the Local Centres to support and enhance them as sustainable settlements and community focal points. Respondents reported the importance of retail stores being located close to other destinations such as work or home, which for the majority of people appeared to be within or in close proximity to the Main Centres and/or Local Centres.

The Committee recognises the potential for significant retail development to be brought forward as part of the StPP HAA, work towards which is currently underway. The Committee would not wish for significant retail developments outside the Main Centres to limit the vitality and viability of the StPP HAA and the wider Town area. The Committee also recognises the opportunity for the Regeneration Areas to add to the consumer experience in Town. In early 2017, the Committee hosted a number of workshops with retailers, which identified what businesses perceived to be the main strengths, weaknesses, opportunities and threats facing Guernsey's retail sector. Among other things, these workshops highlighted a perceived decline in footfall as a concern. Retailers felt that footfall in areas such as Mill Street could be increased by the addition of signage which encouraged people to explore up the hill. The potential to make more of the Old Quarter has been a recurring theme in engagements with retailers and consumers, and the Committee is keen to ensure that the potential of the Regeneration Areas can be unlocked. The workshop attendees also considered access to town, including the appropriate provision of parking, to be a weakness; but the overall attractiveness of the St Peter Port environment was recognised as a strength.

Taking the above into account, the Committee is of the opinion that the policies in respect of retail do not require amendment at this time, and in view of the information gathered in the consumer survey and retailer workshops, the Committee does not presently intend to undertake a further retail study. The Committee will continue to engage with the retail sector as part of its wider schedule of engagements, and will consider any land-related concerns which may be raised in those discussions, liaising with the DPA when any such concerns are considered by the Committee to merit further investigation. The Committee is grateful for the work which the DPA undertakes towards the Retail Audit of Town and the Bridge, but accepts that the gathering of this type of data is something which may most appropriately be undertaken by the Committee in future. The Committee will therefore consider this as part of our work to identify a new approach to data gathering, as described elsewhere in this letter.

Horticulture

The IDP recognises that over recent years the horticultural sector has restructured and consolidated on fewer, but often larger, holdings and today the industry makes only a small contribution to Guernsey's GDP. Those operations that remain do, however, represent a viable industry based on niche market products. The Committee therefore continues to support the approach of the IDP, which enables the continuation and development of existing commercial horticultural activity, whilst also creating opportunities for the repurposing of sites to an alternative use where appropriate, in particular supporting the change of use of redundant glasshouse sites to small scale industrial or storage & distribution use.

The Committee is pleased to note that the IDP permits the development of renewable energy infrastructure on redundant glasshouse sites, as well as on brownfield land and sites where the associated structures are incorporated into existing or proposed developments. The Committee recognises that the development of renewable energy infrastructure in Guernsey has the potential to contribute positively to the economy, and will therefore be working with Committee *for the* Environment & Infrastructure ("CfE&I") to ensure that the potential economic benefits are taken into account as part of work towards a new Energy

Plan. The Committee intends to work with CfE&I to develop a clearer understanding of the future demand and nature of renewable energy production, as well as the economic value this may bring to the island. The Committee envisages that this work will involve consideration of the enablers which need to be in place to facilitate renewable energy generation in Guernsey, including an assessment of the suitability of existing planning policy.

Agriculture, Countryside and Land Management Services ("ACLMS"), a service area reporting to CfE&I, undertakes the annual horticultural census. When this census was started, over 50 years ago, the industry covered approximately 15% of the island with glass and, alongside tourism, was a key driver in Guernsey's economy. As the size and economic value of the industry has contracted in the time since, the need to maintain such a detailed and comprehensive record has reduced, and the scope of the information gathered has therefore been narrowed to enable resource to be allocated to priority workstreams. It should be noted that ACLMS is currently undertaking a cost-benefit analysis to review the level of resource which may be allocated to this exercise in the future. Notwithstanding, ACLMS will shortly report and provide the information which it gathers relating to the small number of commercial glasshouse operations, and will continue to assist in the future as far as resources allow.

It may be pertinent to note that since February 2018, when the Committee for Health & Social Care ("CfHSC") drafted legislation to enable the importation and use of cannabinoids ("CBD"), a number of enquiries have been received by the Committee and CfHSC from businesses interested in the potential to produce CBD on-island, including the growing of cannabis under licence from CfHSC. The Committee is in the process of identifying the potential economic benefits of the industry establishing in Guernsey and any barriers to this taking place. It is not yet clear whether a significant number of businesses may actually establish growing operations in Guernsey, but the nature of the enquiries received would indicate a potential demand for horticultural premises. Should such applications be received, the Committee would wish for Policy OC6, concerning proposals for works to existing glasshouse sites, to be supportive of the appropriate development of sites as may be necessary for the operation of businesses of this type.

Yours sincerely

Deputy Charles Parkinson
President
Committee *for* Economic Development

Appendix 2

Staying visitor numbers

2018 - **232,852** (source Guernsey Travel Survey Quarter 4 2018)

Inactive visitor accommodation sites at end of 2018

As 2017 report (at the time of writing Le Chalet Hotel has an application for CoU pending)

Breakdown of Small accommodation businesses

Self-Catering – 34 sites have less than three units

Guest Accommodation – 13 sites with less than 6 beds

Bed stock at end of 2018

Guest Accommodation			
Rating	**Number Sites / Establishments**	**Rooms**	**Beds**
2 Star	4	33	65
3 Star	10	148	304
4 Star	14	58	158
Waiting Grading	1	1	2
SUB TOTAL	**29**	**240**	**529**

Hotel			
Rating	**Number Sites / Establishments**	**Rooms**	**Beds**
2 Star	6	165	348
3 Star	21	716	1546
4 Star	8	374	789
5 Star	1	62	124
SUB TOTAL	**36**	**1317**	**2807**

Self Catering Accommodation			
Rating	**Number Sites / Establishments**	**Rooms**	**Beds**
2 Star	1	1	4
3 Star	15	48	184
4 Star	40	234	916
5 Star	2	4	10
Mixed	13	98	422
Waiting Grading	1	1	4
SUB TOTAL	**72**	**386**	**1540**

Private Dwelling			
Rating	**Number Sites / Establishments**	**Rooms**	**Beds**
3 Star	1	1	4
4 Star	1	1	2
States of Guernsey Approved	32	34	158
SUB TOTAL	**34**	**36**	**164**

Campsites (not regulated by permit under Tourist Law)				
	Number Sites / Establishments			
	5			
	5			

Group Accommodation			
Rating	**Number Sites / Establishments**	**Rooms**	**Beds**
Waiting Grading	1	4	32
SUB TOTAL	**1**	**4**	**32**

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The President
Committee *for the* Environment & Infrastructure
Raymond Falla House
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14 December 2018

Dear Deputy Brehaut,

Island Development Plan – Annual Monitoring Report, 2018

The Land Planning and Development (Guernsey) Law, 2005
The Land Planning and Development (Plans) Ordinance, 2007

As you will be aware, the Island Development Plan (IDP) contains the current planning policy framework for Guernsey and was adopted in November 2016. The Development & Planning Authority (D&PA) has a statutory obligation to keep the Island Development Plan under review. To do this the D&PA requires expert information and data from relevant Committees in order to monitor the effectiveness of the Plan's policies. A framework for monitoring the IDP is set out in the IDP that includes both quarterly and annual monitoring reports. This is the mechanism for the D&PA to fulfil its mandate and legal obligation to ensure the IDP is fit for purpose and up-to-date.

The D&PA intends to publish the Island Development Plan Annual Monitoring Report for 2018 as soon as practical in 2019. The IDP establishes that the annual monitoring reports will include feedback from stakeholders and will set out actions to address any issues where the monitoring process reveals that changes are needed to the Plan, or any guidance is needed for clarification or any other action is needed by the States. This enables the Island Development Plan to maintain sufficient flexibility to adapt to changing circumstances.

This is an opportunity for your Committee to comment in relation to its mandate, supported by evidence where necessary, on the effectiveness of the planning policies introduced by the Island Development Plan. The D&PA is also requesting some information from your Committee to help assess the situation and ensure the Island Development Plan remains effective and relevant.

We would be grateful for your views on any issue relating to the Island Development Plan. This could include, for example:

- any comments on specific objectives or policies and their continued relevance; and,
- any comments in relation to how the IDP has influenced any development proposals that your Committee has an interest in.

In addition, we would be grateful for information regarding the following:

- information on any reports published since the start of the 2018 – please provide a copy or a link to the document;

Strategic Development and Infrastructure:

- progress with the Long-Term Infrastructure Investment Plan;
- progress with the Energy Policy;

Housing:

- an update on progress with the Housing Strategy, and specifically within that Strategy the Key Worker Strategy and the Elderly Tenure Strategy;

Natural Resources:

- progress with air pollution and water pollution legislation (in relation to parts VI and VII of the Environmental Pollution Law, 2004);
- progress with the Habitat Survey;
- progress with the Coastal Defence Strategy;
- progress with the Biodiversity Strategy;

Agriculture:

- statistical information regarding dairy farming, and also other farming and horticulture when available;

Construction Waste:

- an update on the Waste Strategy;
- an update to the inert waste recycling data provided for the 2017 AMR;

Traffic and Transport:

- an update on the Integrated Transport Strategy;
- an officer level update on the implementation of the ITS – especially with regards to projects to enhance accessibility in the Main Centres to inform our Main Centres Survey for 2018; and,
- any new or updated survey results in relation to the level of provision and use of public parking in the Main Centres, and any data on pedestrian counts, bus passengers, cycle parking, traffic volumes and journey times as was provided for the 2017 AMR.

The 2017 AMR contains actions to address the issues identified as a result of monitoring in 2017. These actions include a number where the Authority is seeking liaison between

Committees at a political level and / or officer level to assist with delivering projects or monitoring. In relation to your Committee this includes:

- liaison at officer and political level in relation to the actions and decisions that arose from the resolutions on the Policy Letter 'Local Market Housing Review and Development of Future Housing Strategy' in July 2018, particularly in relation to the monitoring of housing supply and need and the establishment of an appropriate data collection model and data collection processes;
- liaison at officer level in relation to the development of the Energy Policy;
- liaison at an officer and political level to promote the use of renewable energy equipment and infrastructure as part of development of the Energy Policy;
- liaison at an officer and political level to consider the role and effectiveness of the Island Development Plan in supporting the aims of the Integrated Transport Strategy; and,
- liaison at officer level regarding agricultural land use requirements and aspirations of the agricultural industry.

Officers do already liaise on a number of issues of common interest and I would appreciate your Committee's continued support so that these actions can be addressed in due course.

The Island Development Plan and associated documents, including the 2017 Annual Monitoring Report, can be found here www.gov.gg/planningpolicy

I would be very grateful if you could send any comments that you may have by email to planreview@gov.gg or in writing to the D&PA by 5pm on **28th February, 2019**.

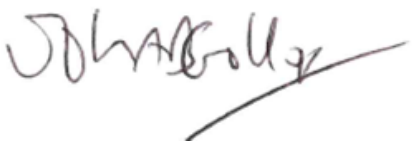
The feedback received will be reviewed and included in the Annual Monitoring Report as appropriate with a D&PA response if required. If you do not want any of the information you provide to be published, please let the Planning Service know.

I would also be grateful if you could confirm that your Committee agrees to the inclusion of your response to this letter in the Annual Monitoring Report, 2018, as part of an appendix, as was the case with the 2017 report.

The Forward Planning team in the Planning Service can assist with any queries. Please contact Ewan Taylor, Forward Planning Officer, in the first instance (ewan.taylor@gov.gg or tel. 677 2540).

Thank you in advance for taking the time to provide feedback.

Yours sincerely,



Deputy John Gollop
President, Development & Planning Authority

Committee *for the* Environment & Infrastructure

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4th March 2019

Dear Deputy Gollop,

Committee *for the* Environment & Infrastructure's Comments on the Island Development Plan for the Annual Monitoring Report, 2018.

Thank you for the continued opportunity to comment on the effectiveness of the planning policies introduced by the Island Development Plan (IDP) in 2016 and to provide information and updates on specific areas of the IDP for inclusion in the Annual Monitoring Report 2018.

Strategic Development and Infrastructure

The Committee is progressing Energy Policy for tabling to the States of Deliberation. It is worth noting the rapid evolution of the energy market both on a macro level in relation to policy supporting moves to decarbonisation and technological advances. The resulting energy transition towards electrification will impact domestic requirements such as electric vehicle charging point installations (both private and public) and energy infrastructure including domestic renewables, utility scale renewables, storage capabilities and importation facilities.

A Long Term Infrastructure Investment Plan is being developed and a period of engagement and consultation will take place. At this stage there are no specific areas to highlight in relation to the IDP or Strategic Land Use Plan.

Housing

A notable step in 2018 for Housing was the publication of the "*Local Market Housing Review and Development of Future Housing Strategy"* Policy Letter, which was debated and endorsed by the States at its July 2018 meeting (Billet d'Etat XIX 2018). As a result of this debate, the States agreed a number of implementations that are worthy of comment.

One of the most fundamental implementations for the Island Development Plan (IDP) was the approved States Strategic Housing Indicator. The States agreed to change existing terminology from 'States Strategic Housing Target' to 'States Strategic Housing Indicator'. This change was

implemented to better reflect the purpose of the Indicator, as opposed to a Target, which wrongly assumed that meeting a Target was solely within the control of the States of Guernsey. The States Strategic Housing Indicator informs housing land supply to ensure that a sufficient quantity of housing provision exists to meet the Island's identified housing requirements. The States cannot control exactly how many units of accommodation are built; this control remains with the landowners and developers. It is hoped that the term 'Indicator' now better reflects this position.

The States agreed that the Strategic Housing Indicator be set at creating 635 new units of accommodation between 2017 and 2021, with a plus or minus variance of 149 new units to give the flexibility to react to market changes. This equates to an annual average of 127 additional units of accommodation (with a plus or minus variance of 30 new units of accommodation), which is a marked reduction on the previous target of 300 new units of accommodation per year.

In addition to this, for the first time, the States agreed to split the States Strategic Housing Indicator into an Affordable Housing Indicator (178 units of affordable housing over the next 5 years, with a variance of 32 units) and a Private Market Housing Indicator (457 additional units of accommodation with a variance of 117 units). This is a very welcome step. For completeness, the Committee *for* Employment and Social Security's response to you will detail its performance at meeting the Affordable Housing Indicator and how this links in with its future land requirements.

It is essential that these Indicators remain up to date and are adjusted as the Island's housing requirements change. An essential area of work that needs to be developed further is developing a model to determine, and monitor, exactly what the Island's housing requirements are now and in the future and, as a minimum, to have this data broken down by type, size and tenure. Only then can the Committee be sure that the best information is informing the supply of housing that needs to come forward; this will clearly feed directly into the IDP. This is a complex piece of work that requires detailed data modelling which, to date, has not been resourced. However, it remains a priority and it is hoped that significant progress will be made in this area during the next year to enable a more positive update.

In endorsing the 'Programme of Works' set out in the "*Local Market Housing Review and Development of Future Housing Strategy"* Policy Letter, the States endorsed a number of additional cross-committee work streams, including the Key Worker Strategy and the Elderly Tenure Strategy. Progress on a number of these work streams will help inform the development of a revised Housing Strategy for Guernsey, which is critical to the future vision, direction and objectives of Housing. Areas of work that feed into this 'Programme of Works' continue to progress independently but, due to the funding for a dedicated staff resource to manage this programme of work only just now being confirmed, progress on pulling these work streams together and making significant development has not occurred as expeditiously as the Committee had hoped. Now that funding has been made available for this staff resource, recruiting will take place imminently and these work streams should now progress. As with an update on the housing requirement model, it is hoped that a more detailed update on these areas can be provided as part of the next Annual Monitoring Report.

Natural Resources

Work to implement the Biodiversity Strategy is progressing well and there have been a number of notable accomplishments in 2018. Progress was reported to the Committee *for the* Environment and Infrastructure in November 2018. An edited version of the report is attached for information.

One of the key focuses is the raising of public awareness and involvement through the work of the Biodiversity Education Officer who is developing work packages with Schools (year 1 to year 9) as well as public events such as INNS Week (INNS = Invasive and Non-Native Species) and maintaining links to the voluntary sector through the Biodiversity Partnership group.

At this formative stage research is being completed to identify the highest priority habitats and species for conservation action and in this context the Island Habitat survey has been completed and will be reported in March 2019. ACLMs continues to review the operation of the Island's Biological Record Centre to ensure that the greatest impact on planning and protection and conservation work is obtained for the contract to provide this facility with Environment Guernsey. Constructive meetings continue to be held every two months with the Biodiversity Partnership Group. As various topics are discussed, working sub-groups have been set up to progress new work streams – for example the Hedge Cutting Action Group, which has been tasked with minimising the detrimental effect on biodiversity from poorly managed hedges and the often incorrectly interpreted Guernsey law.

The development of appropriate and wide ranging wildlife habitat protection legislation is in hand, the Committee having supported a project to review and consult on a new statutory basis to replace the patchy and limited current provision. It is anticipated that this will in due course augment and enhance the Island's capacity to provide effective protections as envisaged in the IDP but which fall outside the traditional reach of planning legislation.

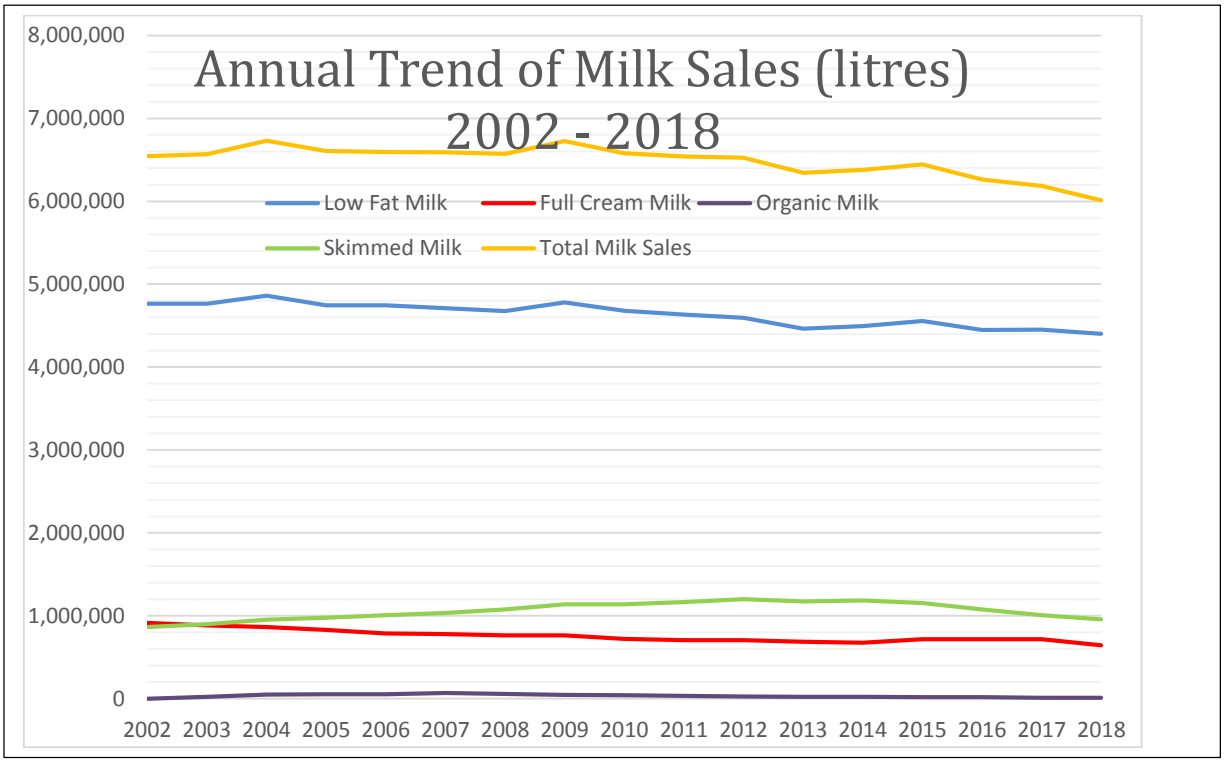
With regard to progress with air pollution and water pollution legislation (in relation to parts VI and VII of the Environmental Pollution Law, 2004), drafting of the air pollution ordinance commenced in Q4 2018. Drafting of the water pollution ordinance is currently prioritised behind the air pollution ordinance and is likely to commence once the air pollution ordinance is complete.

Dairy Industry/Agriculture

The most significant single agricultural use of land and the largest sector for the significance and value of its output is dairy farming. The sector is essentially unchanged in the past 12 month period and can be described by the following statistics:-

- 14 dairy farms;
- 1400 head of cattle in the milking herd (numbers fluctuate, so this is an indicative figure);
- Annual farm output of milk in the region of 8 million litres (8.023 million litres in 2018);

- Liquid milk sales circa 6 million litres (6.03 million litres in 2018);
- Land area managed by dairy farmers circa 8000 vergees (8385 vergees/3395 acres in 2018) ;
- Land used by other farming activities circa 1500 vergees;



Despite the current steady number of farms, it is still anticipated that the number of farms will reduce in the coming years due to retirements. Even though there is a slow trend for a reduction in milk sales (see graph), it is likely that some farms may seek an increase in herd size, a move that could add to the reasons for greater farm infrastructural investment. As the IDP presumes in favour of agricultural developments at farm sites it is presumed that investment will be facilitated by current policy.

The policy context for the dairy industry and its future development remains as set out in the policy letter/States' Report approved in September 2014 (Billet XX Vol1). This gave greater responsibility to the sector to develop a self-sustaining and forward looking industry in collaboration with the Guernsey Dairy. This aspect of the policy is developing with the adoption of RSPCA-assured welfare codes (from 2020) which will require some investment on farms in such things as isolation pens. A new farm data recording approach has been launched and farmers have agreed to work towards accreditation under the LEAF marque (LEAF = Linking the Environment And Farming).

The impact of movement towards the LEAF accreditation may create a slightly increased demand for land for dairy farming, but at the present time the stocking density requirements is set at a standard equivalent to those adopted by the Soil Association of organic growing (even

though only one dairy farm is accredited as organic) and it is not anticipated that further extensification is likely. However, the growing of more grain and fodder crops is conceivable in the context of fluctuating world farm commodity prices and the impact of factors such as the growth of agriculture in China and climate change, and this could create some increase in the area of land managed by the industry.

A review of planning applications for agricultural land in 2018 suggest the same picture as was observed and commented on in 2018 (2017 applications) and that is that the overwhelming majority are for changes of use to domestic curtilage and that very few are refused. The summary reviewed may not be definitive and there are insufficient resources to do more thorough analyses at the present time. However, it can be said that there has been a significant increase in the number of such applications (from some 60 in 2017 to closer to 90 in 2018) and a number are for the change of use of land that previously has been farmed. This is of concern to the Committee, particularly if monitoring continues to show that the IDP policy provision for the principle of change of use of land identified as Agriculture Priority Area to domestic curtilage undermines the amount of land required for agriculture.

Change in the dairy sector will generally be slow and it isn't clear at the present time if these changes (envisaged in the SLUP's wish to have more flexible policies in this respect at the margins of farmed and open land) will have a cumulative negative effect or significance or will merely stimulate adaptation in the land farmed at any one time. The policy positions that give great and rigid protection to farmed land and that which is more amenable to changes of use are both based on belief. The impact will be seen in retrospect at some time in the future. At the present time we are not receiving reports of damage to the capacity of businesses to function.

There are no other trends of significance in agriculture or horticulture which currently impact on the policies set out in the IDP.

Waste Strategy Update

The Waste Strategy is now nearing some of the final stages of the key infrastructure and services implementation. The new collections of waste and recycling were introduced successfully as planned on 3rd September 2018. Collections have bedded in well, in particular in relation to kerbside collections of food waste and dry recyclates, including glass. Early indications are that recycling levels have increased significantly since the new collection system has been introduced, with the introduction of food waste recycling being a major factor.

Preliminary figures for kerbside recycling versus bring banks also indicate a fairly significant increase in dry recyclates collected since the start of the new collection system. The volumes of food waste collected during the first cycle were considerably up on the anticipated amounts. Officers of Guernsey Waste continue to liaise with parish officials and waste contractors to ensure any collection issues are resolved.

The works to complete the Waste Transfer Station (WTS) located on reclaimed land at the Longue Hougue site are on schedule and waste streams are being received at the WTS with commissioning of the equipment expected to conclude in February.

Work to progress the implementation of the new charges including the standard charge element and the 'pay as you throw' element for black bags is well underway and formally commences in February 2019.

Work to improve recycling and waste management in States of Guernsey premises and in the commercial sector is on Guernsey Waste's future business agenda.

Inert Waste Update

The draft Inert Waste Strategy was considered by the States of Deliberation in December 2017. Since then, the Inert Waste Project has been working on a number of work streams to progress the effective management of Inert Waste, with a primary focus on identifying a future inert waste management facility.

A future land reclamation site at 'Longue Hougue South' is currently the 'preferred way forward' for the purposes of providing a replacement Inert Waste facility, when the current facility at Longue Hougue reaches the end of its operational life. Royal Haskoning were commissioned in October 2018 to undertake an Environmental Impact Assessment on a site located south of the current Longue Hougue facility. The project is progressing through the design and analysis phase to develop an Outline Business Case for consideration and ultimately to seek planning and political approvals for any agreed option/solution.

The potential option, currently that of Longue Hougue South, would require the preparation and approval of a Local Planning Brief. In preparation of this planning policy document, my Committee ask that the DPA consider a full range of future uses on reclaimed land be allowed for, from open land, to Industrial, to residential. This will enable better assessment of potential future subsequent benefits of such a project.

At the time of writing we are not able to provide accurate figures for the tonnage of Inert Waste disposed of at the reclamation site, the tonnages known to be recycled and Inert Waste (largely soil) diverted for landfill cover at Mont Cuet for 2018. More accurate figures can be provided later in Q1 2019; however, it is not anticipated that these will differ significantly from those for 2017.

Year	Inert Land Reclamation	Landfill Cover/site prep	Recycling	Totals
2008	122,923	2,889	35,156	160,968
2009	89,724	6,058	30,908	126,690
2010	125,433	12,502	25,427	163,362
2011	101,455	18,374	32,709	152,538
2012	174,584	16,443	36,661	227,688
2013	136,611	17,546	22,451	176,608
2014	126,455	41,825	25,871	194,151
2015	105,442	38,431	15,394	159,267
2016	81,312	42,956	12,936	137,204
2017	56,036	48,344	16,424	120,804

2018	xx	xx	xx	xx

In December 2018, the Guernsey Waste Trading Asset awarded a contract to Rouget to carry out aggregate recycling services, diverting inert waste from the Longue Hougue Reclamation Site. It is anticipated that the amount of recycling will increase following this contract award, whilst the amount of Inert Waste diverted for landfill cover will drop off over the next few years.

Site Waste Management Plans have now been introduced to the construction industry and promoted via the Development & Planning Authority, Guernsey Waste officers and the Construction Industry Forum (CIF) and the newly established CIF Waste Sub-Committee. As this initiative gains further momentum, it is anticipated that more construction and demolition waste will be recycled on site and through forward planning, minimised.

Traffic and Transport

Within the resolutions of the Integrated Transport Strategy (ITS) there was the requirement for the Committee to report back to the States by December 2018 on the effectiveness of the Strategy, but unfortunately, due to competing demands on resources, this has been delayed and it is hoped to complete this policy letter for submission by the middle of this year. In order to report on progress the Committee will be including a wealth of quantitative and qualitative data to support its submission and it is hoped that this information will be useful to the DPA. Much of the quantitative data has been collated already and the Committee is more than happy to share this with the DPA at this time, along with other general data such as parking capacity/use surveys and RTC statistics that are more regularly collated for a range of uses. In particular, the Committee would like to draw attention to the bus passenger figures which have been steadily increasing since 2013. The upward trend in passenger numbers demonstrates an increase in bus use in the island, most importantly among the local population (as illustrated by the rise in numbers on different routes and in all the months outside of the peak tourist season). With the new fleet and improved services, using the bus has become less polluting and more convenient and accessible, and remains an affordable travel option, especially compared with car use. While there is still capacity for continued improvement, this is a positive achievement of one of the core objectives of the Strategy. Should you have any questions or require any clarification on any of this data, Integrated Transport Strategy staff would be more than willing to assist.

With regard to an update on the implementation of the ITS, attached is a list of projects that have been carried out since the Strategy was approved in 2014 which support the priorities of the Strategy to increase active travel as an alternative to car use. These are listed under the broad headings of Pedestrian Infrastructure, Cycle Infrastructure, Bus Infrastructure, Disability Infrastructure, Public Realm Infrastructure and ITS Support/Misc. Infrastructure. Whilst the Committee welcomes the support the IDP policies generally give to the ITS, it would welcome working together more closely, at staff level, to facilitate implementation of individual elements such as travel plans, access plans and measures to encourage active travel.

The Committee notes that the DPA is particularly interested in projects to enhance accessibility in the Main Centres so it would be beneficial to give a little more detail on two public realm infrastructure projects that are in progress – Market Street and North Plantation. Both of these projects will result in changes which will have significant positive impacts on the public realm and appearance of the whole area, as well as improving public access and accessibility.

Improvements are planned to the section of Market Street laid in asphalt which has reached the end of its service life. Changes in this area offer the opportunity to improve the appearance of the area in a sympathetic manner, attracting more people into this area, whilst also improving pedestrian safety and accessibility. The first phase, which will be implemented imminently, sees changes to the traffic management arrangements in the area to make it safer for pedestrians. The second phase will follow in the spring and will see the road resurfaced in an accessible granite surface. Changes at North Plantation will see vehicular access to the road restricted after 10am until 3am. This will improve road safety, allow the area to become predominantly pedestrianised, and allow additional *al fresco* dining to be offered in the area this year. This may then enable further opportunities in the area in the future.

In addition to these projects it is the intention that, in the future, the Committee will look at making pedestrian/public realm improvements in both the Lower Pollet and Church Square.

The DPA is also probably aware that the Committee has published 10 draft regulations as part of the legislative process to extend the standard 25mph speed limit for community hub areas to broadly cover all Local Centres and Main Centre Outer Areas defined in the IDP. The regulations relate to areas of Cobo, L'Aumone, St. Martin, St. Pierre du Bois, Forest, L'Islet, St. Sampson, Braye Road and St. Peter Port. There is also a regulation relating to an area around Blanchelande College. The regulations are due to be laid at the February States meeting 2019 and the introduction of the new speed limits is planned for Sunday 7th April 2019.

The Strategic Land Use Plan

Although the Committee is aware that there is no requirement in the Planning Law or the Policy & Resource Plan for it to monitor the Strategic Land Use Plan (SLUP), unless it decides itself that amendments are necessary or the Policy & Resources Committee directs it to make amendments, it is conscious that the SLUP needs to remain fit for purpose over time and be capable of adjusting to demographic change and future revisions to the strategic policies of the States.

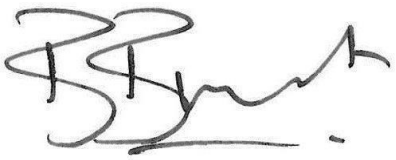
Therefore, in 2018, the Committee decided that it was important to consider the information in the Development & Planning Authority's Annual Monitoring Report, 2017 about how effective land use policies are at delivering the objectives of the SLUP, as well as its own conclusions about the delivery of the SLUP. The Committee concluded that the Purpose and Core Objectives of the SLUP remain consistent with the Policy & Resource Plan's 20 year vision and its priorities and there is no evidence that the SLUP and its spatial strategy are not supporting, or are hindering delivery of, the States priorities. The Committee referred its findings for information to the Policy & Resources Committee in October 2018 who noted its findings.

In considering the performance of the SLUP policies, and the IDP in terms of delivering them, the Committee suggested additional monitoring relating to establishing where new residential development is located within the Main Centres in terms of green field and brown field sites and the location of residential development within the Main Centres and Main Centre Outer Areas boundaries. The Committee was pleased to note that its recommendations to the DPA in this regard were included in the 2017 AMR and it would like to see continued monitoring of these aspects through the AMR 2018.

Thank you for the opportunity to comment. The Committee remains fully committed to liaising at officer and political level as appropriate on the matters identified in the AMR 2017 and to keeping the DPA informed of any information or changes which may be relevant to land use planning.

The Committee agrees to the inclusion of this response in the Annual Monitoring Report 2018.

Yours sincerely,



B. L. Brehaut

President, Committee *for the* Environment & Infrastructure

States of Guernsey
Agriculture, Countryside and
Land Management Services

BIODIVERSITY STRATEGY – 2018 UPDATE

Introduction

Work to implement the Biodiversity Strategy is progressing well and there have been a number of notable accomplishments in 2018. This paper highlights the achievements this year, as well as outlining the work areas under the implementation plan for 2019-2020.

Without doubt the successful implementation of the strategy this year is due in large part to the energetic and effective work of the Biodiversity Education Officer.

Constructive meetings continue to be held every two months with the Biodiversity Partnership Group. As various topics are discussed, working sub-groups have been set up to progress new work streams. For example, the Hedge cutting Action Group which has been tasked with minimising the detrimental effect on biodiversity from poorly managed hedges and the often incorrectly interpreted Guernsey law.

Delivered outcomes in 2018 – a few highlights:

- *Education and awareness:* Since commencing duties less than one year ago, the Biodiversity Education Officer has taught 726 children, given 30 media interviews, launched two campaigns, and engaged 30,056 people through the Biodiversity Partnership Facebook page, through 65 Facebook posts which have reached a total of 125,199 people.

- *Habitat Survey:* The fieldwork has been completed for the 2018 Phase 1 Habitat Survey of the whole island and the report will be delivered by the end of the year.

- *Ramsar Management Plan:* Through the Ramsar Management Group, over 20 individual stakeholders of the Herm Ramsar Site have engaged in the Ramsar Management Plan and there are a number of data collection projects underway, the results of which will inform the future management of the site. Student interns were also recruited to carry out a Phase 1 Intertidal Habitat Survey of the site. A total of 215 hours were volunteered for this project alone and a professional report has been produced with support from the Alderney Wildlife Trust.

- *Facilitating research through partnership with ICL:* Environment Guernsey Ltd have formally partnered with Imperial College London, so that that Masters project opportunities can be advertised and post-graduate students encouraged to undertake research in Guernsey. This

summer, two students spent 8 weeks researching the small mammals of Guernsey and have made significant findings. (https://www.bbc.co.uk/news/world-europe-guernsey-45940044)

- *Capacity building:* The Biodiversity Education Officer has recruited over 1,177 volunteer hours – the equivalent to £23,540 in paid time (at a rate of £20/hour).

- *Pollinator Project:* The Pollinator Project (https://pollinatorproject.gg/) has been well documented in local media and is a flagship project which has won the ICCI 'Best Conservation Project' Award this year. (https://guernseypress.com/news/2018/06/21/pollinator-project-is-main-winner/)

  The Pollinator Project aims to raise awareness of the contribution we can each make to enhance Guernsey's biodiversity by providing food and habitats for pollinators, and encourages the community to make their gardens, allotments, window boxes and balconies pollinator friendly. The volunteer project coordinators work with schools, businesses, community groups and large scale land owners and managers of public spaces to establish pollinator patches and create nesting habitats throughout the island.

- *SeaSearch:* ACLMS has committed to funding SeaSearch to carry out marine research from 2018-2023. SeaSearch is a citizen science project developed by the Marine Conservation Society in the UK, which aims to map the types of seabed found in the near-shore zone in Britain. The funding allocated will enable eight qualified and experienced divers from the UK to visit Guernsey for eight nights each year, as well as building capacity locally by training local divers. The areas to be surveyed each year will be developed with ACLMS and the SeaSearch team to align with other related work streams (e.g. Ramsar).

Implementation Plan – current and future work streams

An update on the progress of each broad work area is provided below.

a) Biodiversity Project Fund

In Q3 of 2017 a £9,900 grant was awarded to La Société Guernesiaise for the Pollinator Project and it is anticipated that this grant will provide sufficient funding for the continuation of the project throughout 2019. The Pollinator Project is managed on an entirely voluntary basis by Barry Wells and Vanessa Crispini-Adams. At the recent Inter-Island Environment Meeting, Jersey delegates expressed an interest in rolling out this impressive project in our sister isle.

This year, the Pollinator Project team have worked with children and teachers on Pollinator Project planting schemes at the following schools: Vale, St Martins, Le Rondin, Melrose, Castel and Elizabeth College. There are plans in progress to do similar at St Mary & St Michael, Haute Capelles, Forest, Little Bears Pre School and the College of Further Education. Talks about pollinators have been given to over 1,000 children in schools, as well as to the RSPB, La Société and all of the Floral Guernsey groups. The team have met with the farming community to discuss the planting of pollinator friendly

hedging on farms, which the prize money from the Insurance Corporation Conservation Award will fund.

The Pollinator Project has become official partners with Buglife (www.buglife.org.uk) and in April, Counties Manager Andrew Whitehouse visited the island to look at a number of potential sites and hold meetings with ACLMS, States Works, school Head teachers and Education Services. Andrew also gave a public talk. The project team have also attended events such as summer fetes and the West Show to promote the importance of pollinators.

Swoffers and Norman Piette have provided the funding for materials to make 50 bee hotels, which are being built by CLIP (Creative Learning in Prison). The Pollinator Project has also received funding from the Co-op Eco Fund, which has facilitated a working partnership with Grow Ltd, who are growing pollinator friendly perennials for use in Pollinator Patches on public sites, as well as for sale to the general public next year.

b) Identify, prioritise and mitigate threats

A framework for a Threats and Mitigation report has been received and work continues with Environment Guernsey Ltd to develop a method of comparing the threats to our biodiversity and the feasibility and associated costs of mitigating such threats, using a number of matrices.

c) Guernsey Biological Records Centre review

It has been recognised from the outset that the collection, storage and dissemination of biological records is a fundamental component of the successful implementation of Guernsey's Biodiversity Strategy. Thus, a strategic review of the mechanism of the Biological Records Centre is required.

i. Data Management Systems

Part 1 of this review has already been carried out; this focussed on the software and digital requirements.

The software used to hold and interpret the Biological Records was created by Charles David in 2003. Since his death in 2011, the software has been maintained by Digimap but it had not been developed since. It was no longer compatible with Windows 10 operating system. Digimap Ltd was commissioned to rewrite the software. Distmaps Pro is the new map-based recording system which was developed on ArcGIS Pro. It was released for testing at the end of Q4 2017. In Q2 2018 training was provided for GBRC staff. It has now replaced Distmaps as the primary software.

A new manager for the Biological Records Centre, Elizabeth Sweet, has been recently been appointed with effect from 1st November and work will now continue to enhance the online interface of the GBRC. The States of Jersey have offered their assistance in rolling out an Indicia-based interface across the Channel Islands. This system has recently been launched by the Jersey Biodiversity Centre (http://jerseybiodiversitycentre.org.je/). There are significant benefits of working with the other Channel Islands to produce an effective method of data recording, consistent across the islands and compliant with national best practice. There are also significant cost savings to be

made by working together with the States of Jersey on this project. This work stream will build on the valuable work and input of Jane Gilmour, the outgoing GBRC manager.

ii. GBRC/Biodiversity Centre

It is proposed that, with thorough consultation and the involvement of key stakeholders, a business case is developed for a Biodiversity Centre to fulfil the long term vision of a centre of excellence for environmental study and education, which will bring environmental issues into the mainstream and has the potential to also include a visitor centre. This work is at an early and conceptual stage and will be developed further during 2019.

d) Education & awareness

i. Identity and branding

ACLMS has worked together with the Communications team to develop a brand for the Biodiversity Partnership, with consistent branding across campaigns such that people can identify and link actions and achievements to the Strategy.

ii. Development and delivery of an education and awareness programme (Biodiversity Education Officer)

The Biodiversity Education Officer was tasked with five key work areas at the commencement of employment:

1. Schools
2. Publicity campaigns
3. Develop links to businesses, schools, environmental and community groups
4. Parishes
5. Build capacity

e) Building capacity

i. Undergrad/M.Sc students and internships

Environment Guernsey has become a partner of Imperial College London, this allows the BEO to advertise research opportunities in Guernsey. Not only does this allow vital research to be undertaken on island, but the students attending have a modest budget to undertake the research and are able to utilise the expertise and resources available at their university. In 2018, two M.Res students undertook research on Guernsey's small mammals. Whilst they were studying on island they also offered management advice to land owners, including Guernsey Airport where a reduction in vole populations on the apron will reduce the likelihood of bird strikes.

Two projects have been advertised for 2019, the first expands on the small mammal research undertaken this year, with a focus on the Herm Ramsar site in order to advise any potential rat eradication programme. The second is on local fresh water bodies and douits to understand more of their ecology and conservation requirements, including the threats caused by invasive species such as American signal crayfish.

An intern was recruited to undertake a Phase 1 Intertidal Survey of Herm Ramsar site, including the digitisation of the data and report compilation. This research will inform the Limits of Acceptable Change for the Ramsar Site (a reporting requirement of the Ramsar Secretariat) and future management requirements.

The goal for 2019 is to recruit a voluntary Intern to fulfil the role of Ramsar Officer and assist in the implementation of Ramsar Management Plan of Herm Ramsar Site and to begin the work towards a Management Plan for the Lihou Ramsar Site.

ii. Corporate Social Responsibility/Volunteer work parties

Corporate Groups who wish to undertake volunteer sessions to fulfil CSR obligations have been engaged to assist with the removal of Sour Fig from Guernsey's West coast. For example, 45 staff members from Artex Risk Solutions pulled 600m^2 of fig over two afternoons at Rocque Poisson.

f) Acquisition of specific data sets

i. Island wide Phase 1 Habitat Survey

The field work for the Phase 1 Habitat Survey began in April and was undertaken by three habitat surveyors. It is now complete, except for data cleaning. The collation of the report is also underway and will be delivered by the end of Q4 2018.

ii. Marine data collection using SeaSearch 2018-2023

ACLMS have agreed to commit funding from the Biodiversity Strategy of £5,000 per annum for five years to fund marine data collection. The objectives of this work area are:

- to encourage participation of volunteer recreational divers and snorkelers in marine conservation through the gathering of data, particularly in areas where little data exists, within Ramsar sites or where there is a conservation need;
- to provide training in recording skills to enable volunteer recreational divers and snorkelers to participate in SeaSearch;
- to raise awareness of the diversity of marine life and habitats through the dissemination of information gathered and the identification of issues arising from it;
- to enable the continual gathering of quality data that can help direct work streams within the Biodiversity Strategy and Ramsar management plans;
- to facilitate the provision of data to the Ramsar Secretariat (one of the requirements of designation);
- to carry out monitoring programmes and informed conservation work streams based on the priorities and principles of the Biodiversity Strategy.

iii. Review of Areas of Biodiversity Importance (ABIs)

It is understood that this work stream has now been prioritised by Planning and has an allocated budget.

g) <u>Habitat Action Plans</u>

i. Preparing specs. for management of Sites of Special Significance

Due to capacity found in Planning Services 2018 budget, this work is now being funded by Planning Services in cooperation with ACLMS. An example SSS Management Plan will be produced and implemented before the end of Q4 2018 to go to public consultation in Q1 2019.

ii. Review and finalise Farm Biodiversity Action Plans report

The Audit Report on the BAP agreements produced by representatives from FWG South East is still under review and the aim is for the final report to be published by the end of Q4 2018, assuming time and resources allow.

iii. General Habitat Action Plans for areas other than ABIs/SSSs, e.g. gardens

Work to formulate General Habitat Action Plans for wider dissemination and publication will begin in 2019.

iv. Site Specific Habitat Action Plans

The first of the Site Specific Habitat Action Plans to be formulated will be for the Icart field which is currently being rejuvenated, followed by a plan for Le Guet.

A management plan has been drafted for Le Guet and is under review. In 2019 work will focus on engaging the community in the proposed future management plan for the whole site in order to enhance the forest for all user groups. A Habitat Action Plan will then be written for the site.

h) *Species Action Plans*

i. *Formica pratensis*

The Species Action Plan for *Formica pratensis*, the Black-backed meadow ant, has been implemented. Working with the GBRC and States Works (the contractor managing the cliff path habitat where the ants are found), the aim is to prevent the number of these very rare (extinct in the UK) ants nests from declining further.

The main identified threat to the species is damage to the nests by mechanised strimming, thus as recommended in the Action Plan, a volunteer from the GBRC has marked the nests along the cliff path network with small red flags, so they can be easily seen and avoided by the cliff path cutting contractors.

The ant nests will be monitored on an annual basis by volunteers from the GBRC.

Species Action Plans will be published on the new and updated GBRC website in due course.

i) *Legislation and agreements*

i. *Legislation review*

The Environment and Infrastructure Policy Officer has commenced work on a framework for a new piece of Wildlife Legislation, which will be brought to the Committee for consideration before the end of 2018. Following this the framework will be the subject of targeted consultation.

ii. *Extension of Convention on Biological Diversity (CBD)*

ACLMS is now working with External Relations to identify the remaining detailed requirements to enable the extension of the CBD to Guernsey. The next step is to approach DEFRA to determine the required actions to achieve the extension.

j) *Miscellaneous*

Miscellaneous work areas and costs include training and conference fees (including travel and accommodation), as well as the purchase of operational and educational equipment and resources.

For example, the Biodiversity Education Officer has attended a WiSe 'train a trainer' course and is an accredited instructor. It is hoped that the WiSe scheme will be rolled out for commercial operators in 2019 (www.wisescheme.org).

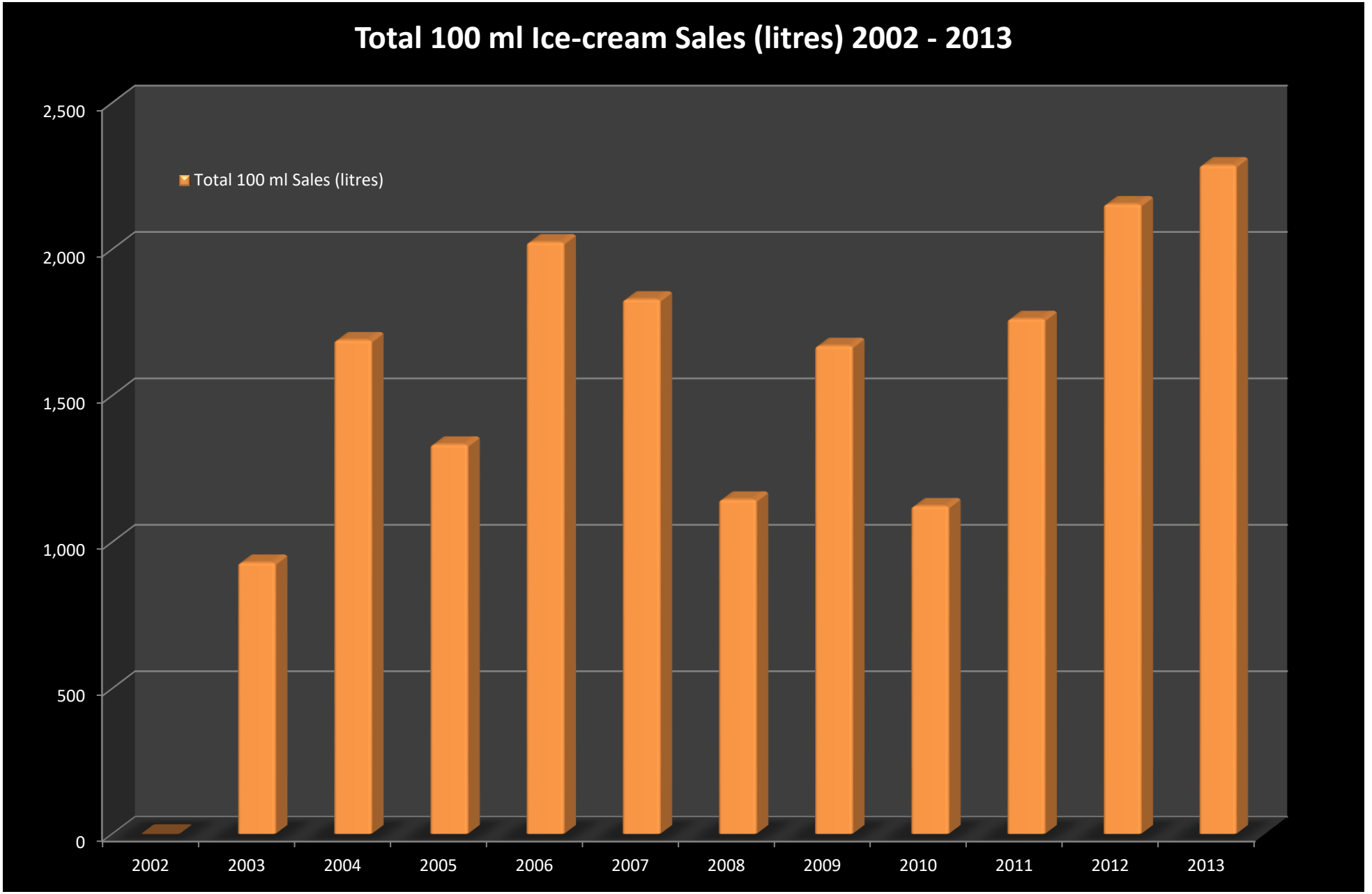
k) *Unplanned*

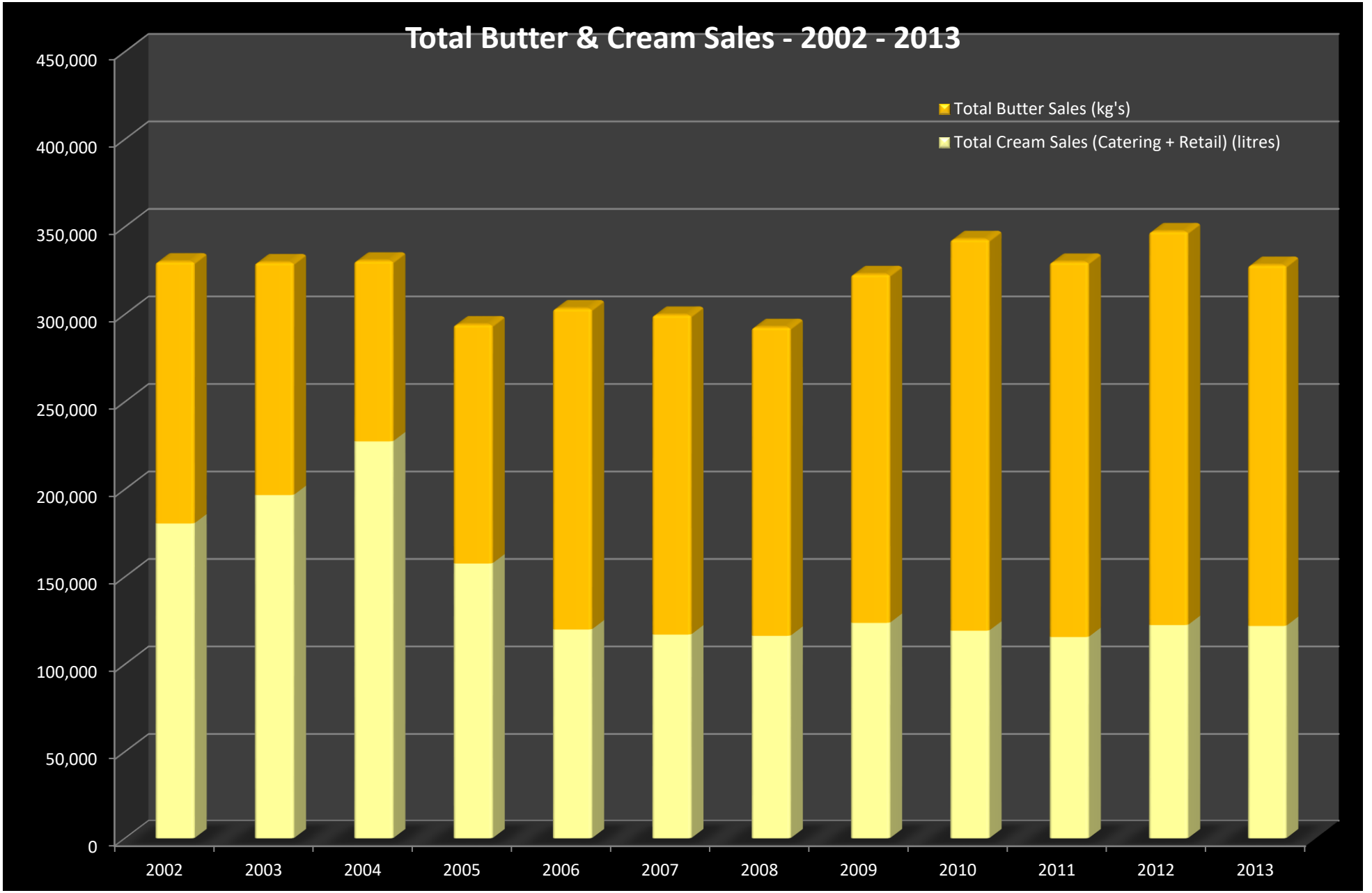
In 2018 resources have been urgently drawn to mitigating the effect of the Asian hornet on our local biodiversity (and public health).

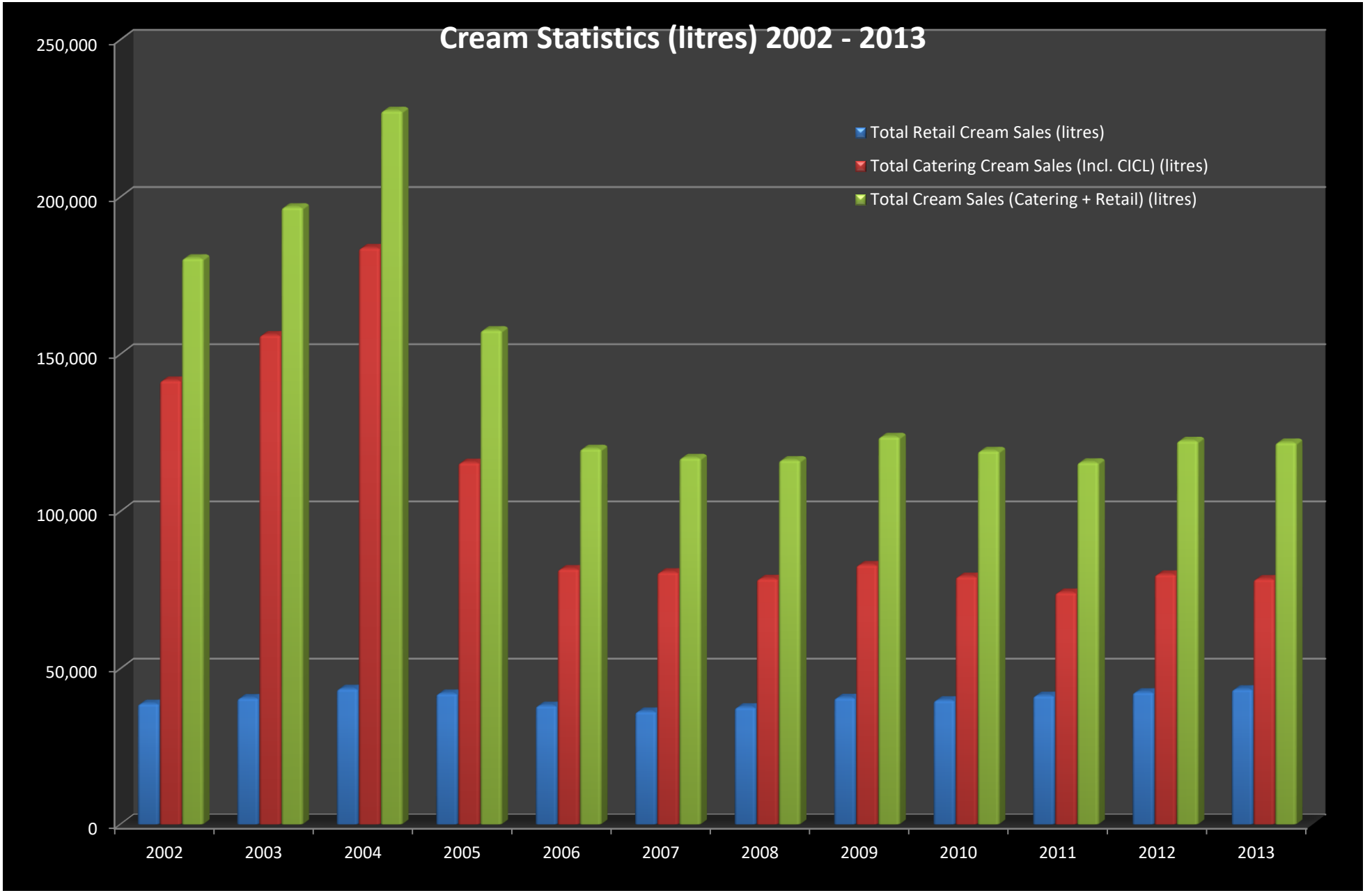
Conclusion

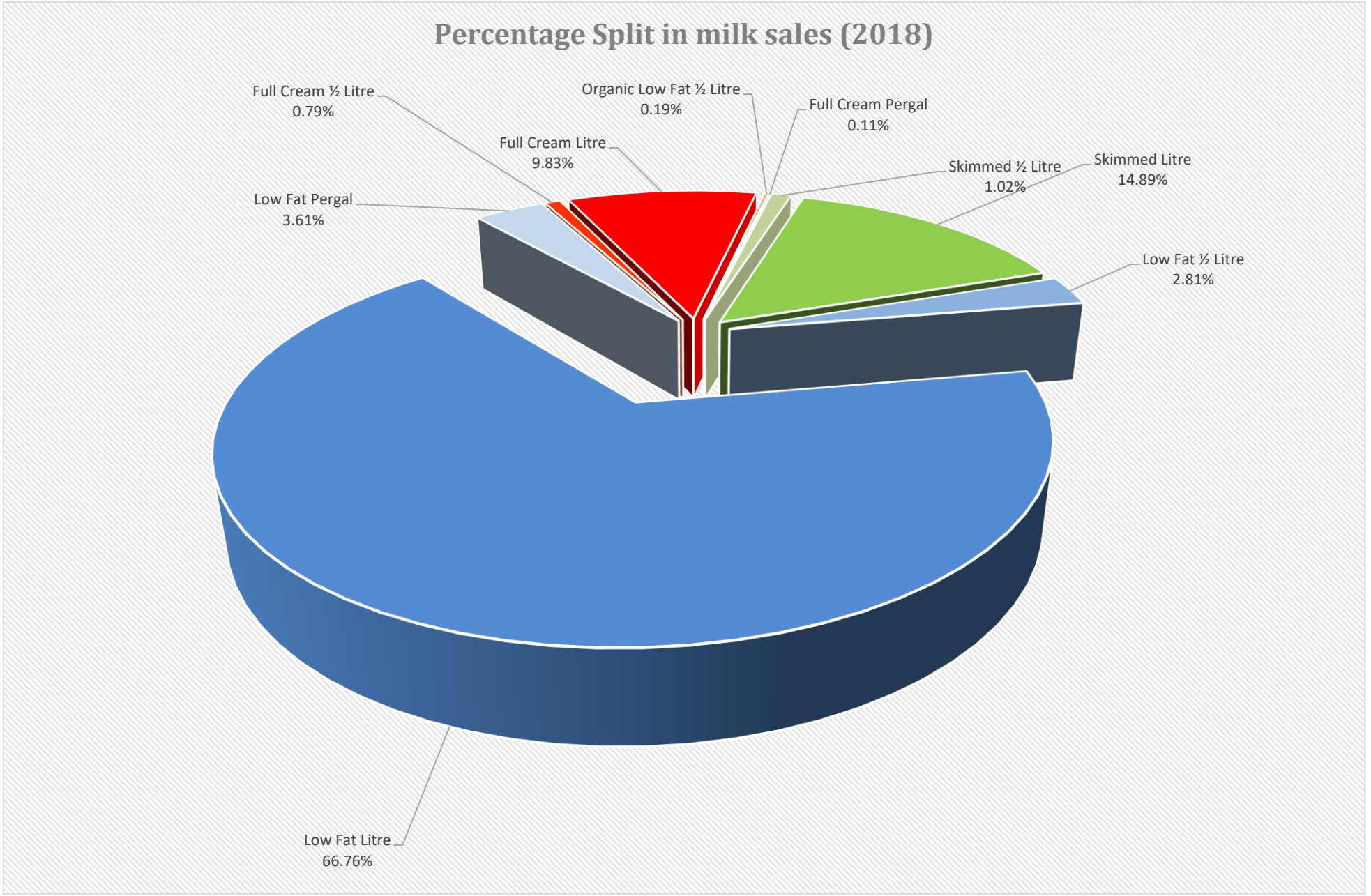
Despite the unplanned work this year to control and raise awareness of the Asian hornet, considerable progress has been made in implementing planned work streams, to budget, which meet the aims of the Biodiversity Strategy. Resource has been bolstered through the recruitment of volunteer interns and partnering with ICL, both achieved by the Biodiversity Education Officer.

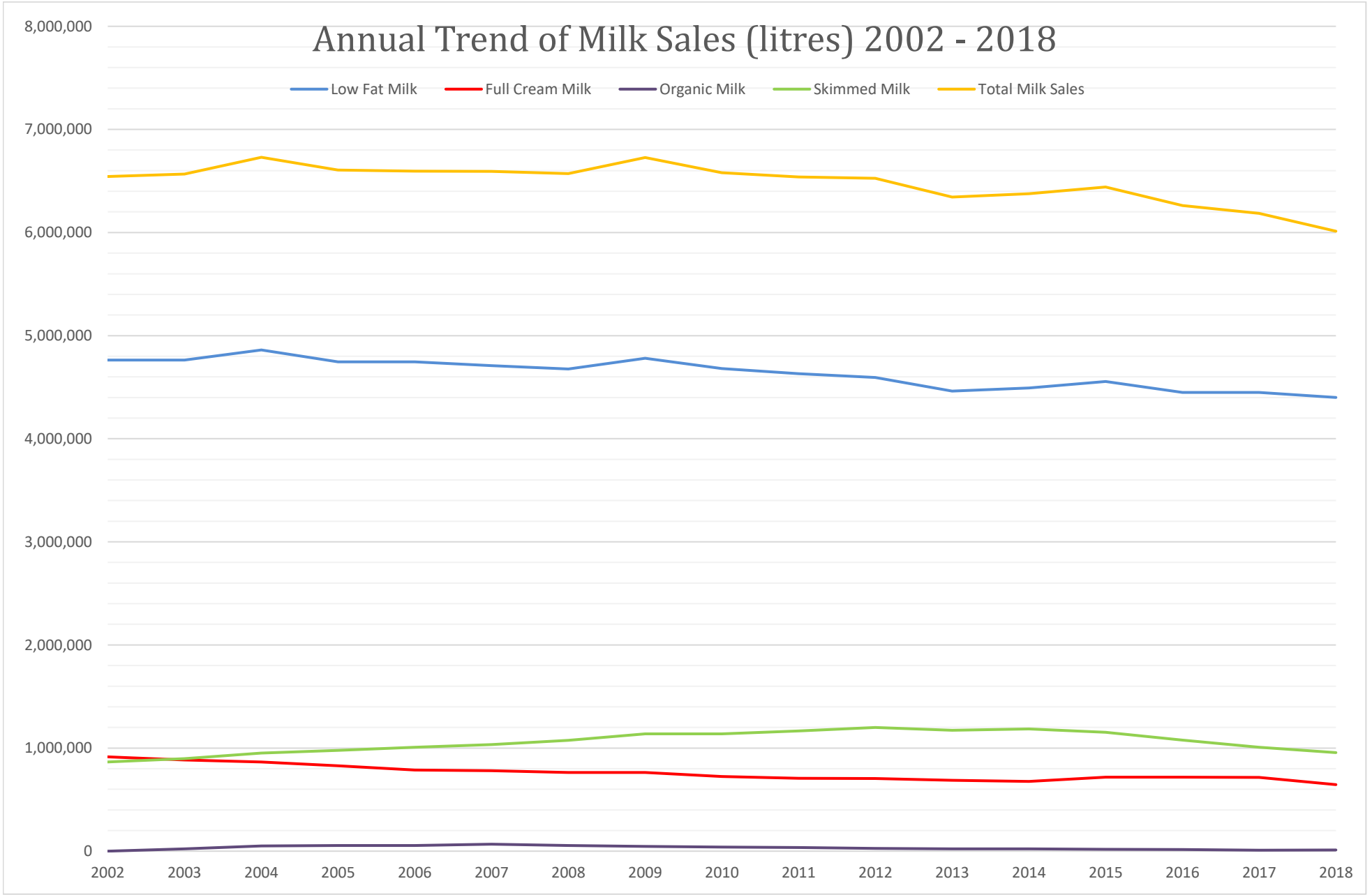
Author: Environment Services Officer
Responsible Officer: Director of Environment Services


Total 100 ml Ice-cream Sales (litres) 2002 - 2013
Total 100 ml Sales (litres)
2,500
2,000
1,500
1,000
500
0
2002
2003
2004
2005
2006
2007
2008
2009
2010
2011
2012
2013


Total Butter & Cream Sales - 2002 - 2013
Total Butter Sales (kg's)
Total Cream Sales (Catering + Retail) (litres)
450,000
400,000
350,000
300,000
250,000
200,000
150,000
100,000
50,000
0
2002
2003
2004
2005
2006
2007
2008
2009
2010
2011
2012
2013


Cream Statistics (litres) 2002 - 2013
250,000
200,000
150,000
100,000
50,000
0
2002
2003
2004
2005
2006
2007
2008
2009
2010
2011
2012
2013
Total Retail Cream Sales (litres)
Total Catering Cream Sales (Incl. CICL) (litres)
Total Cream Sales (Catering + Retail) (litres)


Percentage Split in milk sales (2018)
Full Cream ½ Litre
0.79%
Organic Low Fat ½ Litre
0.19%
Full Cream Pergal
0.11%
Full Cream Litre
9.83%
Skimmed ½ Litre
1.02%
Skimmed Litre
14.89%
Low Fat Pergal
3.61%
Low Fat ½ Litre
2.81%
Low Fat Litre
66.76%


Annual Trend of Milk Sales (litres) 2002 - 2018
Low Fat Milk
Full Cream Milk
Organic Milk
Skimmed Milk
Total Milk Sales
8,000,000
7,000,000
6,000,000
5,000,000
4,000,000
3,000,000
2,000,000
1,000,000
0
2002
2003
2004
2005
2006
2007
2008
2009
2010
2011
2012
2013
2014
2015
2016
2017
2018

Committee *for the* Environment & Infrastructure

List of Transport Strategy projects & initiatives completed or in progress

1 Pedestrian Infrastructure

1.1. Development of walking/cycling application
1.2. Walking to school/work campaigns
1.3. New blister paving & lighting at Fountain street zebra crossing
1.4. Enhancement of North Esplanade footway
1.5. New zebra crossing, La Couture, St Peter Port
1.6. New footway with dropped kerbs, New Road, St Sampson
1.7. New footway, dropped kerbs, blister paving, Les Gravees St Peter Port
1.8. New zebra crossing, dropped kerbs, blister paving, Rue de L'Ecole, Vale
1.9. New footway including dropped kerbs, Havelet
1.10. New footway & dropped kerbs, Le Truchot
1.11. New footway, dropped kerbs, blister paving and zebra crossings, Le Vrangue, St Peter Port
1.12. New dropped kerbs, Les Mielles, Vale
1.13. New dropped kerbs & blister paving, Ruette Braye/Colborne Rd junction
1.14. New footway & dropped kerbs, Route de Carteret, Castel
1.15. New footway, crossing point, dropped kerbs, Rocque Poisson/Les Adams L'Eree
1.16. New dropped kerbs, Bulwer Avenue/Longue Hougue Lane junction
1.17. Improved access, Castle road footway
1.18. Scarifying of Pier steps & St James Street to reduce slipping for pedestrians

2. Cycle Infrastructure

2.1. New cycle shelters, North Beach car park & Le Bordage
2.2. Additional cycle hoops at coastal and visitor locations around the island
2.3. New cycle hoops, Hospital Lane
2.4. New cycle hoops, Les Ozouets Campus
2.5. E bike purchase initiative
2.6. Enabling of cycling through certain road works
2.7. Provision of SoG pool E Bikes
2.8. Introduction of Bikeability programme to primary schools
2.9. Salerie junction improvements
2.10. Review of eastern cycle path
2.11. New Grandes Maisons Road/Bulwer Avenue Toucan crossing
2.12. Cycle to work/school campaigns
2.13. Cycling uphill on footpath initiative (Val des Terres)
2.14. Expansion of Ruettes Tranquilles network
2.15. Re-signing of Cycle Tours routes network
2.16. Provision of cycle shelters to Vale Primary school, St Mary & St Michael School, Forest school

3. Bus Infrastructure

3.1. Four new bus shelters, Hougue Du Pommier, Route de Carteret, Port Soif Lane, Le Chene
3.2. Additional school bus services, St Martin Primary, Castel Primary, Grammar, Les Beaucamps High
3.3. Provision of Wi Fi on buses
3.4. Provision of "Accessibility Cards" to disabled people
3.5. Disability awareness training for public service vehicle drivers

4. Disability Infrastructure

4.1. Licensing of four Accessible Taxis
4.2. New accessible parking space, The Albany
4.3. New accessible spaces, Albert Pier
4.4. New accessible parking space, Hospital Lane
4.5. Cornet Street raised table
4.6. Improved access across Crown Pier
4.7. North Esplanade dropped kerbs
4.8. New blister paving, The Grange junction
4.9. New dropped kerbs, Bank Lane St Sampson
4.10. New dropped Kerbs & Blister paving, Rue des Landes Forest
4.11. New dropped kerbs & blister paving, Hougues Magues/ Rte de Capelles junction

5. Public Realm Infrastructure

5.1. Pedestrianisation of Market Street
5.2. Pedestrianisation of North Plantation

6. ITS support /misc. Infrastructure

6.1. Introduction of electric vehicle charging stations
6.2. Introduction of additional small car parking spaces, Crown Pier, Candie, Havelet, Salerie car park
6.3. Introduction of dedicated electric vehicle parking spaces, North Beach car park
6.4. Road safety awareness campaigns (Road Safety Week, Beep Beep Day, Safety Calling)
6.5. Additional motorcycle parking, Albert Pier, Crown Pier
6.6. New raised table, Longfrie junction
6.7. New filter, Vale church junction
6.8. New filter, Rue de Farras/Rue des Landes junction, Forest
6.9. Provision of high visibility clothing to pre-schools/nurseries
6.10. Improved collision data collection
6.11. Re alignment of parking spaces, Hospital Lane

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The President
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14 December 2018

Dear Deputy Fallaize,

Island Development Plan – Annual Monitoring Report, 2018

The Land Planning and Development (Guernsey) Law, 2005
The Land Planning and Development (Plans) Ordinance, 2007

As you will be aware, the Island Development Plan (IDP) contains the current planning policy framework for Guernsey and was adopted in November 2016. The Development & Planning Authority (D&PA) has a statutory obligation to keep the Island Development Plan under review. To do this the D&PA requires expert information and data from relevant Committees in order to monitor the effectiveness of the Plan's policies. A framework for monitoring the IDP is set out in the IDP that includes both quarterly and annual monitoring reports. This is the mechanism for the D&PA to fulfil its mandate and legal obligation to ensure the IDP is fit for purpose and up-to-date.

The D&PA intends to publish the Island Development Plan Annual Monitoring Report for 2018 as soon as practical in 2019. The IDP establishes that the annual monitoring reports will include feedback from stakeholders and will set out actions to address any issues where the monitoring process reveals that changes are needed to the Plan, or any guidance is needed for clarification or any other action is needed by the States. This enables the Island Development Plan to maintain sufficient flexibility to adapt to changing circumstances.

This is an opportunity for your Committee to comment in relation to its mandate, supported by evidence where necessary, on the effectiveness of the planning policies introduced by the Island Development Plan. The D&PA is also requesting some information from your Committee to help assess the situation and ensure the Island Development Plan remains effective and relevant.

We would be grateful for your views on any issue relating to the Island Development Plan. This could include, for example:

- any comments on specific objectives or policies and their continued relevance; and
- any comments in relation to how the IDP has influenced any development proposals that your Committee has an interest in.

In addition, we would be grateful for:

- information on any reports published since the start of the 2018 – please provide a copy or a link to the document;
- any other information or data that could be relevant that your Committee could share with the D&PA;
- an update on the sports strategy;
- an update on the future structure of secondary schools project; and,
- any information regarding the capacity of schools that could have implications for the location of new housing development.

The Island Development Plan and associated documents, including the 2017 Annual Monitoring Report, can be found here www.gov.gg/planningpolicy

I would be very grateful if you could send any comments that you may have by email to planreview@gov.gg or in writing to the D&PA by 5pm on **28th February, 2019**.

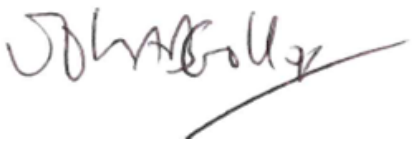
The feedback received will be reviewed and included in the Annual Monitoring Report as appropriate with a D&PA response if required. If you do not want any of the information you provide to be published, please let the Planning Service know.

I would also be grateful if you could confirm that your Committee agrees to the inclusion of your response to this letter in the Annual Monitoring Report, 2018, as part of an appendix, as was the case with the 2017 report.

The Forward Planning team in the Planning Service can assist with any queries. Please contact Ewan Taylor, Forward Planning Officer, in the first instance (ewan.taylor@gov.gg or tel. 677 2540).

Thank you in advance for taking the time to provide feedback.

Yours sincerely,



Deputy John Gollop
President, Development & Planning Authority

The Committee *for* Education, Sport & Culture requested that its response remain confidential.

Development &
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The President
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14 December 2018

Dear Deputy Le Clerc,

Island Development Plan – Annual Monitoring Report, 2018

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The Land Planning and Development (Plans) Ordinance, 2007

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We would be grateful for your views on any issue relating to the Island Development Plan. This could include, for example:

- any comments on specific objectives or policies and their continued relevance; and,
- any comments in relation to how the IDP has influenced any development proposals that your Committee has an interest in.

In addition, we would be grateful for:

- information on any reports published since the start of the 2018 – please provide a copy or a link to the document;
- any other information or data that could be relevant that your Committee could share with the D&PA;
- an update on progress with the review of the social housing stock;
- an update on progress with the combined housing waiting list data;
- an update on progress with the Key Worker Housing Strategy;
- your Committee's views on the delivery of private and affordable housing during 2018 in relation to meeting the Island's housing need; and,
- any evidence based information about future private and affordable housing needs.

The 2017 AMR contains actions to address the issues identified as a result of monitoring in 2017. These actions include a number where the Authority is seeking liaison between Committees at a political level and / or officer level to assist with delivering projects or monitoring. In relation to your Committee this includes liaison at officer and political level for the D&PA to update on progress with the larger housing sites in relation to the delivery of affordable housing. Officers do already liaise on a number of issues of common interest and I would appreciate your Committee's continued support so that these actions can be addressed in due course.

The Island Development Plan and associated documents, including the 2017 Annual Monitoring Report, can be found here www.gov.gg/planningpolicy

I would be very grateful if you could send any comments that you may have by email to planreview@gov.gg or in writing to the D&PA by 5pm on **28th February, 2019**.

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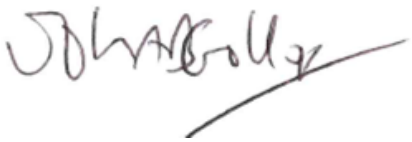
The Forward Planning team in the Planning Service can assist with any queries. Please contact Ewan Taylor, Forward Planning Officer, in the first instance (ewan.taylor@gov.gg or tel. 677 2540).

Thank you in advance for taking the time to provide feedback.

Yours sincerely,



Deputy John Gollop
President, Development & Planning Authority

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06 February 2019

Dear Deputy Gollop

Island Development Plan – Annual Monitoring Report, 2018

Thank you for the continued opportunity to comment on the effectiveness of the planning policies introduced by the Island Development Plan (IDP) in 2016.

The policy of most relevance to the Committee *for* Employment & Social Security is Policy GP11: Affordable Housing. To date, this policy has not been implemented in full because no sites above the 20 unit threshold have completed the planning process. Initial discussions have taken place with landowners of sites meeting the Policy's criteria, and preparatory work commenced enabling these developments to be progressed, but as yet these sites have not completed the planning process. The foundation discussions that have been had with landowners as a result of Policy GP11 have been productive and without issue, but it is hard to comment on the operational effectiveness any further until the Policy is progressed through to implementation.

The Committee is disappointed by larger sites not coming forward for development and would be interested to better understand the reasons why. While Policy GP11 is designed to ensure that the development of a site is still viable under its application, without further dialogue with landowners and developers it is unclear exactly why larger sites are not being put forward for development. This is an area the Committee would be interested in considering further with the Development & Planning Authority (DPA) and it supports any workstreams that link in to this area.

In addition, as part of the IDP's 5 year review, the Committee would be interested in working with the DPA to consider further the implementation of a tariff in lieu of affordable housing for smaller sites that come forward for development. It appears to the Committee that a number of sites are being developed but all so far have fallen under the 20 unit threshold and for this reason the Committee, to date, has seen no gain for affordable housing provision. The Committee fully supports the aim of Policy GP11 but feels that its threshold

of 20 units in the absence of any other tariff has proven difficult to meet the Policy's sentiment of providing additional units of affordable housing to meet the Island's requirements.

A notable step in 2018, was the States of Deliberation debating the "*Local Market Housing Review and Development of Future Housing Strategy"* Policy Letter in July[1]. As a result of this debate, the States agreed the States Strategic Housing Indicator be set at creating 635 new units of accommodation between 2017 and 2021, with a plus or minus variance of 149 new units to give the flexibility to react to market changes. This equates to an annual average of 127 additional units of accommodation (with a plus or minus variance of 30 new units of accommodation), which is a marked reduction on the previous target of 300 new units of accommodation per year.

In addition to this, for the first time, the States agreed to separate the States Strategic Indicator into an Affordable Housing Indicator and a Private Market Housing Indicator. It was agreed that the Affordable Housing Indicator be set at 178 new units of affordable housing over the next 5 years, with a plus or minus variance of 32 units. This implementation gives a tangible figure for the Committee to work towards, and measure itself against, when planning and delivering the affordable housing development programme; this is a very welcome step.

Table 1 below summarises the Committee's existing affordable housing development programme with the Guernsey Housing Association (GHA).

Table 1 **Current Affordable Housing Development Programme**

Year Units Completed	Number of Units
2017	45
2018	50
2019	63 *(of which 24 are key worker accommodation)*
2020	37
2021	22

Table 1 shows that the current programme marginally exceeds the current affordable housing indicator, which is symptomatic of it being planned for before the indicator was set. While this is a very positive step in meeting the island's affordable housing requirements, the current programme will see all its sites developed out by the GHA by 2021. Therefore, work has commenced on identifying future development sites for the Committee to analyse and progress so that the Island's affordable housing requirements continue to be met in the short/medium term. It is essential that the Committee works with the DPA to scope the

[1] Billet d'Etat XIX 2018

future affordable housing requirements so this can be fed into the 5 year IDP housing land supply review.

The Committee works closely with the GHA in striving to source sufficient land to meet the Affordable Housing Indicator now and for the future but there are two variances that make it difficult to plan the future programme with accuracy: the number of sites coming forward as a result of Policy GP11 and the speed at which States-owned sites become available for housing development.

The previously mentioned uncertainty around larger sites coming forward, the number of units that could be acquired for affordable housing and the development timescales involved make it almost impossible to predict with accuracy how, and when, any affordable housing units will result from Policy GP11. The Committee is mindful that it needs to take a pragmatic approach when relying, or not as the case has so far proven, on units that could be brought forward as a result of this Policy.

Secondly, in relation to future land supply, the Committee wishes to raise its frustration at the speed at which some States-owned land becomes available for housing development. Some sites have been raised as potential for acquisition for affordable housing development but, with one significant site in particular, it carries with it uncertainty around the timing. Again, this leaves planning the site acquisition requirements to meet the affordable housing indicator in an uncertain position.

Another key implementation during 2018 was the merging of Housing's and the GHA's social rental waiting and transfer lists. A single gateway to social rented housing now exists and the joint waiting/transfer list provides much more accurate data on the Island's social rental requirements by number and by bedroom size. However, this is only part of the picture.

Work has progressed on reviewing the Island's social housing stock to determine exactly what sized properties existing tenants and waiting list applicants require now and in the future. A complete review of the Island's social rental housing stock is underway to better determine the sized properties that are required compared to those that actually exist. This is not as simple as looking at the merged waiting/transfer list to determine what size units are required; a number of existing social rental households are in 'mis-matched' accommodation for their housing requirement and future household size projections need to be taken into account so that optimum data is available to inform the next stage of the affordable housing development, and redevelopment, programme.

Only once the exact requirements are known and estimated can the Committee be confident that the States and GHA social rental accommodation is utilised as efficiently as possible. The collation of this data is the most advanced it has ever been in recent times and progress continues to be made but factors such as void costs and decant policies need to be carefully balanced before real progress can be made.

It is hoped that during 2019 more sophisticated modelling will be developed so that the Island's affordable housing requirements for the short/medium term can be more accurately determined and updated on a rolling basis.

The final area of comment is in relation to the development of a Key Worker Strategy. In endorsing the 'Programme of Works' set out in the "*Local Market Housing Review and Development of Future Housing Strategy"* Policy Letter, the States endorsed the workstreams of analysing key worker housing requirements and establishing a Key Worker Housing Strategy. This is an extensive piece of work and cuts across a number of committees. While small pockets of work that feed into these workstreams continue independently, they have yet to be pulled together into an overarching review and strategy. The resource to implement and project manage the workstreams endorsed as part of the Local Market Housing Review has taken time to be confirmed. However, funding has recently been made available for these resources so recruitment will take place immediately and this, together with the other workstreams, will progress. It is hoped that a more detailed and positive update can be provide as part of the next Annual Monitoring Report.

Thank you again for the opportunity to comment. The Committee endeavours to keep the Development & Planning Authority informed of any issues it encounters in implementing any of the planning policies over the next year and is committed to working with the Authority on any areas it considers necessary.

Yours sincerely

Deputy Michelle Le Clerc
President

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The President
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14 December 2018

Dear Deputy Soulsby,

Island Development Plan – Annual Monitoring Report, 2018

The Land Planning and Development (Guernsey) Law, 2005
The Land Planning and Development (Plans) Ordinance, 2007

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- any comments on specific objectives or policies and their continued relevance; and,
- any comments in relation to how the IDP has influenced any development proposals that your Committee has an interest in.

In addition, we would be grateful for:

- information on any reports published since the start of the 2018 – please provide a copy or a link to the document;
- any other information or data that could be relevant that your Committee could share with the D&PA;
- an update on the information your Committee provided for the 2017 Annual Monitoring Report regarding the strategic plans in relation to PEH re-profiling, community hubs, community properties and demand for key worker housing; and,
- an update on the Children & Young People's Plan.

The 2017 AMR contains actions to address the issues identified as a result of monitoring in 2017. These actions include a number where the Authority is seeking liaison between Committees at a political level and / or officer level to assist with delivering projects or monitoring. In relation to your Committee this includes liaison at officer and political level in relation to the proposed network of community hubs. I would appreciate a continued dialogue between our Committees on this issue. Officers do already liaise on a number of issues of common interest and I would appreciate your Committee's continued support so that these actions can be addressed in due course.

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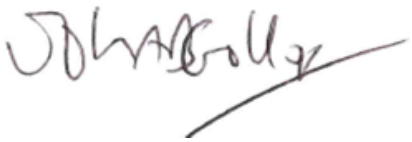
Thank you in advance for taking the time to provide feedback.

Yours sincerely,



Deputy John Gollop
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4 March 2019

Dear Deputy Gollop

Re: Island Development Plan – Annual Monitoring Report 2018

Thank you for your letter dated 14th December 2018 in respect of the Island Development Plan – Annual Monitoring Report 2018. The Committee *for* Health & Social Care (the Committee) is grateful for the opportunity to contribute towards this review and recognises the importance of the Island Development Plan (IDP) in terms of balancing social, environmental and economic considerations to ensure that development supports the public interest.

Many of the observations made by the Committee in April 2018 in relation to the 2017 Annual Monitoring Report remain equally valid at this time and are reiterated in this response, which is divided into the following three aspects: (i) the objectives and policies of the IDP itself; (ii) the Committee's strategic plans; and (iii) broader considerations relating to the health and social care system.

Under part (ii) of this letter, the Committee has identified some concerns about the delivery of two projects related to primary and community-based care, which are supported by the Committee and which have the potential to contribute significantly to the States' strategic objectives for the future of health and care in Guernsey. We believe this can be addressed constructively, and would like to work with the Development & Planning Authority to understand why they have not been able to progress so far and find an appropriate way forward.

i) Objectives and policies of the Island Development Plan

The impact of the physical environment on health and wellbeing

In December 2017, as part of the Committee's Partnership of Purpose Policy Letter, the States Assembly unanimously agreed that *"the States, in all its policy decisions, should consider the impact of those decisions on health and wellbeing, and make use of any opportunities to improve or reduce health inequalities, across all government policies"* (Resolution 15 of Article XII, Billet d'État No XXIV of 2017).

As referenced within the Partnership of Purpose, the "Fair Society, Healthy Lives" review of health inequalities in England is applicable to the Bailiwick. One of the recommendations falling out of this report was the need to create and develop healthy and sustainable places and communities. This recognised that the health and wellbeing of individuals is influenced by the communities in which they live. The physical environment (such as poor housing, deprived neighbourhoods, lack of green spaces) impacts negatively on both physical and mental health and the creation of physical environments where people can live healthier lives with a greater sense of wellbeing greatly reduces health inequalities.

This fully supports the principal aim of the IDP, that is *"to ensure land planning policies are in place that are consistent with the Strategic Land Use Plan and* ***which help to maintain and create a socially inclusive, healthy and economically strong Island****, while balancing these objectives with the protection and enhancement of Guernsey's built and natural environment and the need to use land wisely."* The Committee fully supports sections 2.2.18-2.2.21 of the Plan which clearly articulate the importance of social, community, leisure and recreation services and facilities and accessibility for all Islanders, which may be achieved by supporting and encouraging active travel and lifestyles, the continued provision of open spaces or any environment that supports physical activity.

Working collaboratively across sectors

The Partnership of Purpose seeks to emphasise that the effective delivery of health and care in the island does not rest solely with the Committee and requires the public, private and third sectors to work together to meet community needs. The Committee is aware of a number of planning applications that would, or would have, resulted in significant investment in the provision of health and care services by the private sector, including some that are discussed in more detail below.

Whilst the Committee acknowledges that it is the role of the IDP to balance many competing policy priorities, it is important to acknowledge the impact that the Plan can have on either supporting or frustrating the aspirations of commercial organisations that play an important role in delivering the Partnership of Purpose. With this in mind, the Committee is keen to ensure that the Plan and associated planning processes do not serve to frustrate the

commercial aspirations of key partners in the transformation of health and care and that private investment in such services can be encouraged and successfully facilitated.

ii) The Committee's strategic plans

While the transformation of health and social care services extends further than buildings and infrastructure, the maximisation of the Health & Social Care estate and the wider network of health and care providers is a vital enabler in terms of delivering a model of care which best meets the needs of the community.

In this respect, the Committee is pleased to provide an update of progress in a number of key areas of its work. It will be important for the IDP to act as an enabler to support these important opportunities to transform health and care.

(a) Hospital Modernisation Programme

Earlier this month the Committee published its proposals for a phased ten-year development Programme for the Princess Elizabeth Hospital (PEH) site. The Policy Letter sets out a number of important projects to address some of the highest areas of clinical and estate risk and to maximise the use of space within the site. The Committee looks forward to working in partnership with the DPA to enable its plans to modernise the site to be bought to fruition and has been pleased with the planners' helpful advice received to date.

Although the current proposals to extend and refurbish areas of the PEH site will not extend the physical infrastructure of the buildings onto surrounding agricultural land, the Committee wishes to take the opportunity to highlight that it considers it prudent for the IDP (and supporting policies of the States) to acknowledge the strategic significance of the land surrounding the hospital campus and for this to be reserved for further development of the PEH, should this be required in the future.

(b) Primary Care and Community-Based Services

During 2018, the Committee gave its support to a planning application from Queen's Road Medical Practice to develop a Health & Wellbeing / Community Hub at the Le Friquet Flower Centre, and another from Island Health to redevelop their facilities at L'Aumone. Both applications were consistent with the States' strategic objectives for health and care, as set out in the Committee's Partnership of Purpose policy letter (Billet d'État XXIV of 2017). We were deeply disappointed that the first application was rejected, and the second (which we understand is still going through the planning process) has so far received unfavourable feedback.

The strategic objectives of the Partnership of Purpose include an emphasis on primary care and prevention, and a desire to provide services in community-based settings wherever

possible. The ethos, as in its name, is one of *partnership* – working together with all health and care providers to support the health and wellbeing of everyone who lives in Guernsey. These applications represented two cases of independent primary care practices voluntarily working towards States' objectives in a spirit of partnership with us, and we are concerned that neither has been able to get off the ground.

The Committee understands that, in principle, the Island Development Plan and its policies (in particular policy S5: Development of Strategic Importance) allow for appropriate treatment of projects that meet strategic objectives. We would like to work with the Development & Planning Authority to explore how these existing policies can be used, or if need be new policies can be developed, to ensure that projects which would enhance primary care and community-based health and care services in Guernsey are handled in a manner consistent with States' objectives set out in the Partnership of Purpose and the Policy & Resource Plan.

(c) Community Hubs

The Committee continues to progress proposals for an interconnected network of community hubs, which will see a renewed Community Services offering, placing the user at the centre of provision. This is an important part of the delivery of the Partnership of Purpose and the reconfiguration of services to meet the community's needs.

As the DPA will be aware, the Committee has been working closely with the Committee *for* Education, Sport & Culture (C*f*ESC) to evaluate the use of the "Les Ozouets Campus" or other sites currently utilised to deliver education for either a dedicated community or blended education and community hub and for this to be included in redevelopment proposals for this site that will be put forward by C*f*ESC. To realise this aim, it is of significance to HSC to ensure that the IDP makes suitable policy provisions that will enable this site (or other similar sites that may be identified in the future) to be used for a purpose other than for education and that a flexible approach can be taken where broader benefits can be evidenced.

(d) Community properties

The Committee is mindful that its current community portfolio, accommodating service users across children and adult services, are in varying degrees of disrepair. Equally, the properties which have been variously adapted over the years fall short of best practice standards and can act as a disabler rather than an enabler for individuals due to small room sizes, narrow corridors, inability to install tracking hoist and access/egress challenges for service users with a disability. In light of this, the Committee is engaging with the Guernsey Housing Association (GHA) to identify a future model where the GHA develops the facilities, subsequently undertaking landlord functions with HSC providing appropriate levels of care

and support, together with modern enabling environments to improve outcomes for a range of health and care needs.

(e) Key worker housing

The Committee also faces considerable challenges associated with the recruitment and retention of staff and is heavily reliant on recruitment from off-Island. In order to appropriately compete with other jurisdictions it needs a range of accommodation that is best suited to the range of needs of essential workers. For example, there may be an increased need for housing that is able to support couples and families.

In terms of meeting a broad range of housing needs, the Committee is working closely with the Committee *for the* Environment & Infrastructure (C*f*E&I) and will ensure that where there is a requirement for housing that supports the delivery of health and care, this is fed into the future vision, direction and objectives that will form a revised Housing Strategy.

Furthermore, in terms of ensuring that there is an adequate land supply for housing, the Committee is keen to work closely with the DPA and the Committee for Employment & Social Security (Housing) to scope the options available to meet future requirements and ensure that this is fed into the five-year IDP land supply review.

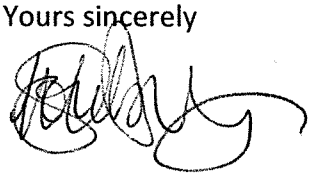
iii) Broader considerations regarding the health and care system

As highlighted in the Committee's response on the 2017 Annual Monitoring Report, the ageing demographic is impacting on the services required (and in turn the associated physical environment) and the Committee is seeking to further understand this through a series of Population Needs Assessments. This is a process for establishing the health and care needs of a group of people, establishing whether there may be gaps in services or issues needing priority attention and will help to address future service developments.

Public Health is currently in the process of completing a Joint Strategic Needs Assessment (JSNA) for Older People in the Bailiwick. Whilst the findings are presently being analysed, it is evident from the feedback gathered that the information will enable a number of strategic priorities to meet the needs of older islanders to be identified, including the requirement for suitable housing provision for older Islanders, together with convenient access to a range of health and care services. The Committee will share the detailed findings of the JSNA with the DPA shortly as this will provide an evidence base to guide future work.

I trust that this response is helpful. If you require any further information please do not hesitate to contact the Committee's Chief Secretary, Mr Mark de Garis.

Yours sincerely



Deputy Heidi Soulsby
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14 December 2018

Dear Deputy St Pier,

Island Development Plan – Annual Monitoring Report, 2018

The Land Planning and Development (Guernsey) Law, 2005
The Land Planning and Development (Plans) Ordinance, 2007

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- any comments on specific objectives or policies and their continued relevance; and,
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In addition, we would be grateful for:

- information on any reports published since the start of the 2018 – please provide a copy or a link to the document;
- any other information or data that could be relevant that your Committee could share with the D&PA;
- feedback on whether your Committee consider that any of the IDP policies are providing a barrier to the delivery of the States priorities as set out in the Policy & Resources Plan;
- an update on progress with the Seafront Enhancement Area; and,
- an update on any proposed changes to the suite of statistical publications due to be published in 2019.

The Island Development Plan and associated documents, including the 2017 Annual Monitoring Report, can be found here www.gov.gg/planningpolicy

I would be very grateful if you could send any comments that you may have by email to planreview@gov.gg or in writing to the D&PA by 5pm on **28th February, 2019**.

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The Forward Planning team in the Planning Service can assist with any queries. Please contact Ewan Taylor, Forward Planning Officer, in the first instance (ewan.taylor@gov.gg or tel. 677 2540).

Thank you in advance for taking the time to provide feedback.

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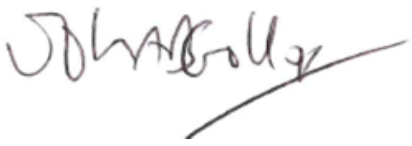

Deputy John Gollop
President, Development & Planning Authority

Policy & Resources Committee

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29th January 2019

Dear ~~Deputy Gollop~~ John,

Island Development Plan – Annual Monitoring Report, 2018

Thank you for the opportunity to contribute to the 2018 Annual Monitoring Report for the Island Development Plan (IDP). Guernsey has limited resources and ensuring their effective use is essential to achieving the long-term goals of the Future Guernsey Plan.

Comments on Specific Objectives

- **Policy GP11: affordable housing**

The introduction of this policy was controversial and the final outcome placed significantly fewer requirements on developers than originally proposed. It is evident from the quarterly and annual reports that it has been applied in very few, if any, cases in the last two years. Given this policy has been "live" for two years, the Policy & Resources Committee (P&RC) requests that the Development & Planning Authority (DPA) reviews how it has functioned in practice and assess whether:

- it has been or is likely to become effective in achieving the intended objectives;
- it is creating a behavioural distortion in applications to avoid the application of the policy; and
- whether it would be appropriate to amend the policy to make it more effective and/or reduce behavioural distortions, or rescind the policy

- **SP1 and other special policies: development outside the centres**

The focus of development to main and local centres is core to the IDP. It is evident from the quarterly reporting that a number of developments have taken place under various policies on sites outside the main and local centres. P&RC requests that the DPA includes

an analysis of the profile of various types of development between the main and local centres and outside the centres to provide an assessment of the success of the Plan in preventing the urbanisation of more rural areas.

- **Annex VI: Regeneration areas**

The IDP identifies a number of areas within the main centres as regeneration areas. Whilst some development has taken place in some of the identified areas, it is clear that in others progress towards redevelopment has been slow. P&RC requests that the DPA includes in its report an assessment of how effective the policy has been at encouraging redevelopment in these areas and what, if any, barriers may be hindering the progress.

In contribution to this work, an update of the Seafront Enhancement Area Project is appended to this letter as requested.

Requests for Additional Analysis

Given current policy priorities established by the Future Guernsey Plan the Policy & Resources Committee also recommends that the DPA pay specific attention to analysing the following matters in its annual report:

- **The ageing demographic and the changing needs of the population**

Noting that Policy LP5 of the Strategic Land Use Plan makes specific reference to the need to provide for the changing demographic profile, the DPA is asked to assess this issue - does the IDP adequately support the provision of specialised housing, care facilities and housing accessible to the older population; and whether there are barriers to development which may be unnecessarily discouraging private sector development in this area.

- **The progression from planning permission to construction**

The quarterly reports indicate that there are a number of permission which are not progressed to development, but at present there is little context against which to assess whether this is unusual. The DPA is asked to consider whether there have been any noticeable changes to the trend in the number of permissions successfully completed or expired, and what factors appear to influence progression (e.g. location, type of development, size of development).

Data availability and developments

The Data and Analysis Unit has confirmed that there are no significant changes to the relevant data publications planned for 2019 although work to improve the data quality is ongoing. It has requested assistance from Planning Services and Building Control to improve the collection and update of information on the number of bedrooms in properties. Officers are asked to contact the Data and Analysis Unit directly to discuss any more detailed information requirements. Meanwhile the Annual Housing Stock Bulletin is provided as requested.

I can confirm that the Committee agrees to the inclusion of this response to your letter in the Annual Monitoring Report 2018.

Yours sincerely

Deputy G A St Pier
President
Policy & Resources Committee

Seafront Enhancement Area – Progress Update for IDP Annual Monitoring Report (as at 22nd January 2019)

The Seafront Enhancement Area (SEA) programme, agreed by the States of Deliberation as one of 22 policy priorities, is the development and co-ordination of policies for the enhancement of the east coast of Guernsey including St Peter Port and St Sampson's Harbour Action Areas. The origins of the SEA programme stem from the States-approved Strategic Land Use Plan (2011), which identified the need for a 'vision' for Town and the Bridge. This led to the preparation of certain policies in the Island Development Plan, which established the planning mechanisms for bringing forward the Harbour Action Areas and was approved by the States in 2016.

A political Steering Group has been formed to co-ordinate the SEA programme. Membership consists of representatives from the Policy & Resources Committee, the Committee *for* Economic Development, the Committee *for the* Environment & Infrastructure, the Development & Planning Authority, and the States' Trading Supervisory Board. Owing to recognised advantages in bringing forward some enhancements as quickly as possible, and acknowledging that the programme is complex and extensive and likely to take some time to fully deliver, the Steering Group decided to split the overall SEA programme into two work streams:

1. The development of a long-term plan for the east coast; and
2. The identification of shorter-term initial enhancement projects.

<u>Long-term Plan</u>

To outline the framework in which the SEA programme can progress, the Steering Group has agreed a number of Enhancement Principles and Objectives. Whilst the Enhancement Principles establish the broad criteria that any potential enhancement must adhere to, the Enhancement Objectives provide the more specific outcomes of the SEA programme, which the Steering Group will aim to achieve. Full copies of the Enhancement Principles and Objectives are included in appendix A.

Using the Enhancement Principles and Objectives, the Steering Group has scheduled a stakeholder workshop, with the aim of identifying the challenges and problems that need to be addressed and fixed and the opportunities for enhancement that will meet the aims of the SEA programme. Following identification of these, the Steering Group will undertake an evidence gathering process to ascertain the extent and viability of each element, before undertaking an engagement process to determine the public's opinion of these. This will culminate in the production of a high-level SEA plan and business case. The process will inform the precise nature of these, but it is envisaged that they will both identify each of the components of the SEA programme that will be expected to come forward, together with a delivery mechanism for the proposals.

The SEA programme has not yet determined a precise physical area of study, as this will be clarified through the work being undertaken to understand the problems that need resolving and the opportunities for enhancement that might exist along the Island's east

coast. Thought is being given to how the SEA programme will be delivered through established planning mechanisms, such as those that exist for the Harbour Action Areas. Therefore, the Steering Group will work closely with the Development & Planning Authority on the development of a draft Local Planning Brief, if this is regarded as the most appropriate mechanism, and at this stage it is envisaged that this will be developed in parallel with the production of the high-level SEA plan and business case.

Initial Enhancements

The Steering Group has identified six States-owned sites along the St Peter Port seafront, which have the potential to be enhanced without adversely impacting the ability to deliver the long-term plan for the east coast. Alongside a six-week public engagement programme, aiming to identify the public appetite for the enhancement of these sites, the Steering Group has also invited formal expressions of interest for the sites. This process has resulted in over 350 responses to the public engagement programme, and 35 formal expressions of interest have been lodged. This signals a strong appetite for change and reflects a perceived strength in the Island's economy, with a number of individuals, interest groups and businesses willing to invest in Guernsey's future.

The expressions of interest received will be reviewed by the Steering Group using criteria that takes into account the perceived economic, social and environmental benefit of the proposals, as well as the fit with public opinion, Enhancement Principles and Objectives, the views of a community panel and other technical information. At the time of writing, this process is underway and is expected to lead to a maximum of three proposals per site being shortlisted for a further round of assessment based on developed, detailed business cases. It is the intention of the Steering Group that at least one of the six sites should see some form of physical enhancement before October 2019.

Appendix A
SEAFRONT ENHANCEMENT AREA PROGRAMME
ENHANCEMENT PRINCIPLES AND OBJECTIVES

Enhancement Principles

- Ensure any proposed enhancements are consistent with the Policy & Resource Plan and its aims to create and maintain an economically strong, socially inclusive and healthy Island.

- Ensure enhancement is consistent with the Strategic Land Use Plan.

- Enable a mixed use of land that supports the wider objectives of the States of Guernsey.

- Ensure effective use of the Island's natural and built assets in order to support the wider objectives of the States of Guernsey.

- Provide infrastructure that enables the effective and efficient functioning of the Island and gives opportunities for economic growth.

- Manage the built and natural environment in a way that balances the need to conserve, with the need to enhance, the quality of the built environment.

- Where possible and appropriate, maximise the environmental benefit of enhancement.

- Enable adequate access and movement for all.

- Take advantage of opportunities that will mitigate current and future threats to Guernsey, including rising sea levels and energy security.

- Address and, where possible, meet the sometimes conflicting needs of all key user groups (resident, visitor and business).

Enhancement Objectives

- Support Guernsey's Blue Economy, by improving the offering for both commercial and leisure users of the harbour areas; encourage investment in current, and creation of new, recreational activities on Guernsey's east coast and support marine eco-systems.

- Encourage and support enhancement that can improve the experience for visitors to Guernsey in terms of travel, recreation and leisure, accommodation, and culture and heritage.

- Support the retail sector by encouraging enhancement that will result in greater footfall in the main centres on Guernsey's east coast.

- Support enhancement that meets the needs of employers needing staff accommodation.

- Make provision for emerging economic sectors.

- Support enhancement that could relate to renewable energy or meet energy requirements and harbour-related industry.

- Address issues of accessibility, including the management of pedestrian and vehicle movement.

- Support and encourage enhancements that reinforce a sense of place and the local distinctiveness of an area.

- Encourage those using the area to connect with the physical environment and develop a sense of pride and ownership.

- Address and meet safety and security requirements.

- Support and encourage a mix of vibrant and diverse uses to promote the vitality of the area.

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The President,
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14 December 2018

Dear Deputy Ferbrache,

Island Development Plan – Annual Monitoring Report, 2018

The Land Planning and Development (Guernsey) Law, 2005
The Land Planning and Development (Plans) Ordinance, 2007

As you will be aware, the Island Development Plan (IDP) contains the current planning policy framework for Guernsey and was adopted in November 2016. The Development & Planning Authority (D&PA) has a statutory obligation to keep the Island Development Plan under review. To do this the D&PA requires expert information and data from relevant Committees in order to monitor the effectiveness of the Plan's policies. A framework for monitoring the IDP is set out in the IDP that includes both quarterly and annual monitoring reports. This is the mechanism for the D&PA to fulfil its mandate and legal obligation to ensure the IDP is fit for purpose and up-to-date.

The D&PA intends to publish the Island Development Plan Annual Monitoring Report for 2018 as soon as practical in 2019. The IDP establishes that the annual monitoring reports will include feedback from stakeholders and will set out actions to address any issues where the monitoring process reveals that changes are needed to the Plan, or any guidance is needed for clarification or any other action is needed by the States. This enables the Island Development Plan to maintain sufficient flexibility to adapt to changing circumstances.

This is an opportunity for your Committee to comment in relation to its mandate, supported by evidence where necessary, on the effectiveness of the planning policies introduced by the Island Development Plan. The D&PA is also requesting some information from your Committee to help assess the situation and ensure the Island Development Plan remains effective and relevant.

We would be grateful for your views on any issue relating to the Island Development Plan. This could include, for example:

- any comments on specific objectives or policies and their continued relevance; and,
- any comments in relation to how the IDP has influenced any development proposals that your Committee has an interest in.

In addition, we would be grateful for:

- information on any reports published since the start of the 2018 – please provide a copy or a link to the document;
- any other information or data that could be relevant that your Committee could share with the D&PA;
- an update on the Surface Water Management Strategy (The 2017 AMR contains an action for the Planning Service to work with Guernsey Water / STSB on the Strategy);
- an update on the delivery of the Waste Strategy;
- agreement for input from officers to the analysis of data contained in Site Waste Management Plans submitted with planning applications in 2018, as has been discussed at the site waste management forum. (There was insufficient data to include analysis in the 2017 AMR, but there is now more data that should be analysed in the context of the implementation of the Waste Strategy. The Planning Service requires support in order to achieve this and properly assess the effectiveness of IDP policies in supporting the delivery of the Waste Strategy); and,
- any updates regarding projects that may have implications for land use planning and therefore would be pertinent for the D&PA to know about such as any information relating to the airport and/or harbours or the States property portfolio in general.

The Island Development Plan and associated documents, including the 2017 Annual Monitoring Report, can be found here www.gov.gg/planningpolicy

I would be very grateful if you could send any comments that you may have by email to planreview@gov.gg or in writing to the D&PA by 5pm on **28th February, 2019**.

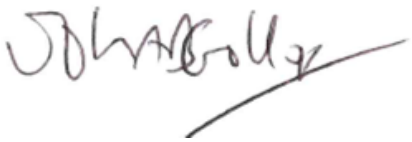
The feedback received will be reviewed and included in the Annual Monitoring Report as appropriate with a D&PA response if required. If you do not want any of the information you provide to be published, please let the Planning Service know.

I would also be grateful if you could confirm that your Committee agrees to the inclusion of your response to this letter in the Annual Monitoring Report, 2018, as part of an appendix, as was the case with the 2017 report.

The Forward Planning team in the Planning Service can assist with any queries. Please contact Ewan Taylor, Forward Planning Officer, in the first instance (ewan.taylor@gov.gg or tel. 677 2540).

Thank you in advance for taking the time to provide feedback.

Yours sincerely,



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President, Development & Planning Authority

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6 February 2019

Dear Deputy Gollop

Response to the Annual Monitoring Report for 2018

Thank you for your earlier correspondence requesting information and updates on specific areas of the Island Development Plan and any other relevant issues for inclusion in the Annual Monitoring Report. I have provided an update for you particularly for the areas you have requested.

Waste Strategy Update

The Waste Strategy is now nearing some of the final stages of the key infrastructure and services implementation. The new collections of waste and recycling were introduced successfully as planned on 3rd September 2018. Collections have bedded in well, in particular in relation to kerbside collections of food waste and dry recyclates, including glass. Early indications are that recycling levels have increased significantly since the new collection system has been introduced, with the introduction of food waste recycling being a major factor.

Preliminary figures for kerbside recycling versus bring banks also indicate a fairly significant increase in dry recyclates collected since the start of the new collection system. The volumes of food waste collected during the first cycle were considerably up on the anticipated amounts. Officers of Guernsey Waste continue to liaise with parish officials and waste contractors to ensure any collection issues are resolved.

The works to complete the Waste Transfer Station (WTS) located on reclaimed land at the Longue Hougue site, are on schedule and waste streams are being received at the WTS with commissioning of the equipment expected to conclude in February.

Work to progress the implementation of the new charges including the standing charge element and the 'pay as you throw' element for black bags, is well underway and formally

commences in February 2019, with the per bag stickers being implemented from 3rd February and the annual bill being issued in the first few weeks of February

Work to improve recycling and waste management in States of Guernsey premises and in the commercial sector is on Guernsey Waste's future business agenda.

Inert Waste Update

The draft Inert Waste Strategy was considered by the States of Deliberation in December 2017. Since then, the Inert Waste Project has been working on a number of work streams to progress the effective management of Inert Waste, with a primary focus on identifying a future inert waste management facility.

A future land reclamation site at 'Longue Hougue South' is currently the 'preferred way forward' for the purposes of providing a replacement inert waste facility, when the current facility at Longue Hougue reaches the end of its operational life. Royal Haskoning were commissioned in October 2018 to undertake an Environmental Impact Assessment on a site located south of the current Longue Hougue facility. The project is progressing through the design and analysis phase, to develop an Outline Business Case for consideration and ultimately to seek planning and political approvals for any agreed option/solution.

The potential option, currently that of Longue Hougue South, would require the preparation and approval of a Local Planning Brief. In preparation of this planning policy document, my Board ask that the DPA consider a full range of future uses on reclaimed land be allowed for, from open land, to Industrial, to residential. This will enable better assessment of potential future subsequent benefits of such a project

Site Waste Management Plans have now been introduced to the construction industry and promoted via the Development & Planning Authority, Guernsey Waste officers,the Construction Industry Forum (CIF) and the newly established CIF Waste Sub-Group. As this initiative gains further momentum, it is anticipated that more construction and demolition waste will be recycled on site and through forward planning, minimised. The Guernsey Waste Team work closely with the Planning Service and will provide support with the data analysis for Site Waste Management Plans.

Guernsey Ports

The General Manager of Guernsey Ports has no further updates on the Guernsey Airports and Guernsey Harbours projects, with regard to any potential implications for land use planning. My Board refers to feedback provided last year with regard to the Harbour Area Action Plan (HAA), which is still relevant. An extract of the STSB's response to the DPA last year, is provided below:

"..The STSB and Ports management looks to seek a return from the Ports' property estate that is in the best interests of islanders. The STSB and the Ports seek to achieve the best value in managing its assets, realising the potential that may be created by the Harbour Action Area (HAA).

Ports management would like to take every opportunity to more fully utilise the Ports Assets, whilst it is cognisant of the need to pause for the States to take a wider strategic view of the whole area and its greater impact and potential for regeneration and re-development, pending the development of the Harbour Action Area.

STSB is firmly of the view that the HAA should provide a significant opportunity for the States, the local economy, St Peter Port and the Harbour, however the timing, resources and process required to deliver that blueprint, has to be managed against the present need to increase revenue generation for the Ports (and the States)..”

Guernsey Water

On 2nd October 2018 the Guernsey Water Board endorsed Guernsey Water's Surface Water Management Strategy. This sets out how we will deliver our Surface Water Management Policy, which was endorsed by the Committee *for the* Environment & Infrastructure in 2016 and is available online[1].

This strategy is a long term plan to adapt the island's drainage systems to climate change; it supports the IDP General Policy (**GP9): Sustainable Development**. To achieve this Guernsey Water is planning to manage the run-off from 9,700 m^2 of impermeable area per annum over the next 30 years. This is dispersed between several target areas across the island.

The target applies to retrofit schemes that are aimed at reversing the impact of historical development that has connected into the islands drainage systems, without adequate surface water management. This has reduced the capacity of these systems to deal with climate change in the future. The first of these schemes has been successfully completed in partnership with the Office *for* Education, Sport & Culture at Vauvert Primary School. Future schemes may have planning implications and we would welcome the opportunity to discuss this with the DPA.

In line with our Surface Water Management Policy, Guernsey Water has also developed guidance for permeable paving and other surface water management techniques[1]. This has been provided for architects and developers in support of the planning process where such measures are required. It will be important for the success of the strategy to ensure that going forward; new development does not further reduce the capacity of the drainage systems to deal with climate change. The best way of managing this is through the planning process and Guernsey Water would welcome the opportunity to discuss how itcan work together with the DPA to achieve this.

Guernsey Water will be publishing a summary of its Water Resource and Drought Management plan before the summer of 2019. This plan covers the planning period to 2040. It shows that the balance between water supply and the demand for water during a repeat of the worst historic drought in Guernsey is finely balanced. Therefore Guernsey Water have developed a drought management plan that would implement temporary measures to maintain essential water supplies to all customers as drought conditions worsen. This means that the level of protection from drought is comparable to that

[1] http://www.water.gg/SuDS

provided by water companies in England and Wales, and currently exceeds that provided by some companies in the South of England. This level of reliability of service during drought was endorsed by the Committee *for the* Environment & Infrastructure in March 2017.

However, beyond the current planning period there is considerable uncertainty with regard to the impact of climate change. Water companies in England and Wales are also starting to plan for much greater levels of resilience from drought. Therefore, unless an alternative use of greater long term value is identified for Les Vardes Quarry, it will remain safeguarded for water storage in the States' Strategic Land Use Plan and Island Development Plan. This position was endorsed by the Committee *for the* Environment & Infrastructure in March 2017.

Therefore, the current policy set out in **IDP5** remains appropriate. This allocation secures a future option to develop longer-term resilience to more severe drought than Guernsey has historically experienced, which is prudent given uncertainty over how severe climate change will be in the future.

Les Vardes Quarry has been discounted as a short term option for inert waste, following receipt of further information on the operational life of its quarry business. However, it still remains a potential long term option for inert waste, if it is demonstrated that this use would be of greater long term value to islanders than the current allocation for water storage.

Property Services

Property Services continue to work closely at officer level with the DPA on a regular & frequent basis.

One private site has obtained planning permission for open storage compounds in support of the IDP policy for the clearance of redundant glasshouse sites. That site was progressed with the support of Property Services to stimulate the market and replace the temporary storage compounds at Fontaine Vinery. A States resolution has required Property Services to develop the Griffiths Yard site on the Northside of St Sampson, to accommodate the tenants vacating Fontaine Vinery. This provides an opportunity to test the need for further open storage, as the majority of the Griffiths Yard site is marketed, now that the Fontaine Vinery tenants have relocated.

Property Services are also working with the DPA on a number of Development frameworks, funded by Property Services. The intention of these Development Frameworks are to "de-risk" a site in development terms for any future developer. Unfortunately, these frameworks are taking a long time to complete, resulting in a delay of these sites being offered to the market.

Incorporated Trading Assets

The States Trading Supervisory Board (STSB) has also requested feedback from the Incorporated Trading Assets and have received the following from Guernsey Electricity.

Guernsey Electricity feel the policies within the Island Development Plan are acceptable for their business as usual activities of installing and replacing electrical distribution equipment.

From the perspective of potential future on-island renewables projects, their view, which is shared by my Board, is that the IDP policies could be more supportive, and may indeed need to be more supportive, to enable the island to meet its energy policy aspirations in future. This may require input from the Energy Programme and the relevant Policy work stream of the Committee *for the* Environment & Infrastructure.

Several examples are illustrated below from extracts of the Island Development Plan:

A. Agriculture Priority Areas:
'proposals for development which would result in the loss of an existing farmstead or agricultural holding in the Agriculture Priority Area will only be supported where it is demonstrated that the farmstead or land is no longer required for agricultural purposes and any proposed new use accords with the other relevant policies of the Island Development Plan.'

B. Policy on Renewable Energy Schemes:
'proposals that involve the development of greenfield land, other than redundant glasshouse sites, will only be supported where the renewable energy infrastructure is ***subterranean*** *and it can be demonstrated that the proposal will not compromise the ability to utilise the land for agricultural purposes.'*

We would suggest that these policies could be quite restrictive on the development of some renewable technologies, and solar in particular would be prevented by subterranean infrastructure.

I can confirm that the STSB agrees to the inclusion of the information in this letter of response, in an appendix to the Annual Monitoring Report, 2018.

Yours sincerely

J C S F Smithies
Vice President
States Trading Supervisory Board

cc: States Trading Supervisory Board

Appendix 2:

Consultation with the Committee *for the* Environment & Infrastructure in respect of the Strategic Land Use Plan

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The President
Committee *for the* Environment & Infrastructure
Raymond Falla House
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3rd December 2019

Dear Deputy Brehaut,

Island Development Plan – Annual Monitoring Report, 2018

The Land Planning and Development (Guernsey) Law, 2005
The Land Planning and Development (Plans) Ordinance, 2007

The Strategic Land Use Plan (SLUP), 2011, places significant requirements on the Development & Planning Authority (D&PA) in relation to monitoring the performance of a number of different elements of the Island Development Plan (IDP). Effective monitoring is managed through the D&PA submitting regular reports to the Committee, as required by the SLUP, setting out how the Island Development Plan is satisfying specific economic, social and environmental objectives of the States.

I write to ask the Committee to note the draft Annual Monitoring Report (AMR) and the Authority's conclusions concerning the SLUP, and to request that the Committee provides the Authority with a response as to any intentions it may have as regards the SLUP or comments on strategic land planning given the conclusions of the draft AMR.

Analysis of the effectiveness and relevance of the IDP policies has revealed that, generally, they are performing as intended and therefore there are no recommendations in the draft AMR to revise the SLUP.

The Committee may wish to invite comment from key stakeholders on the draft AMR (as regards the delivery of the aims of the SLUP and any amendment required) if it considers this necessary to inform its response to the D&PA on whether the Committee is of the view that the aims of the SLUP are being delivered (in terms of the Linking Policies) and whether it considers there is a requirement to amend the SLUP or the IDP or whether guidance is needed or other action required by the States.

Once your Committee's response has been received by the Authority, any necessary revisions will be made to the draft AMR and the Committee's response will be included in the AMR as Appendix 2. A final draft AMR will be presented to the Authority for endorsement prior to the drafting of a policy letter and publication for the consideration of the States.

The Authority would be grateful for your response by 8th January 2020 to enable a timely submission for States consideration.

Thank you in advance for taking the time to consider this important issue.

Yours sincerely

Deputy Dawn Tindall
President, Development & Planning Authority

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8 January 2020

Dear Deputy Tindall

The Island Development Plan – Annual Monitoring Report, 2018,
The Land Planning and Development (Guernsey) Law, 2005
The Land Planning and Development (Plans) Ordinance, 2007

Thank you for your letter of 3 December 2019 on the Annual Monitoring Report (AMR) for 2018 on the Island Development Plan (IDP) which asked the Committee for its comments and if it had any intentions regarding the Strategic Land Use Plan (SLUP).

The Committee noted that the Development & Planning Authority (DPA) has concluded that the evidence provided in the draft 2018 AMR demonstrates that the policies of the IDP are delivering the objectives effectively and the proactive elements of the SLUP as intended. No specific impediments have been identified to delivering these requirements.

The Committee is satisfied from the report that the IDP is delivering the objectives of the SLUP and can support delivery of the States' priorities. It supports the DPA's intention to liaise with relevant Committees concerning the land use aspects of existing and emerging States' strategies. There is no requirement at this stage for the Committee to give any further general guidance or specific direction to the DPA concerning achieving those objectives and it has not identified any evidence of need to amend the policies of the IDP at this time.

The Committee is of the opinion that there are several matters identified in the AMR 2018 that require further research. The Committee notes that the DPA has extended the scope of its five year review of some of the IDP policies, as set out in its Action Plan, to cover these matters. It agrees that this is the best way of investigating the issues and making further amendments to the IDP, if required, alongside the required review of housing and employment land.

Although the IDP is delivering the objectives of the SLUP in general terms the Committee is not wholly confident that Policy GP3: Areas of Biodiversity Importance (ABI's) is providing a sufficiently robust policy mechanism to offer an appropriate level of protection of biodiversity when development proposals are being considered. The Committee recognises that there is a two-level approach to the protection of biodiversity

(ABIs and Sites of Special Significance). The purpose and appropriate level of protection of ABIs was designated through the IDP process, including Public Inquiry and States approval, but the Committee is of the view that protection needs enhancing to meet current expectation. It understands that some of the information which informed the ABI designations was dated and lacked detail so that the requirements to fulfil Policy GP3 could not be tailored to the special biodiversity interest of a specific site. This blanket approach reduces the effectiveness of the policy to deliver the level of protection envisaged by the SLUP.

However, the Committee is pleased to note that the DPA is undertaking a review of the criteria for the selection of ABIs and that the designated ABIs which relied on dated information will be reassessed to determine their appropriateness. This will include identification of their biodiversity interest and any threats to it as well as an assessment, using the published Habitat Survey, to identify additional sites with potential to be designated as ABIs. This will enable a more robust and targeted application of policy to reduce the impact on the special interest of particular sites and will guide development to minimise the impact on biodiversity more effectively.

The 2018 AMR shows that approximately 2.28 hectares of glass needs clearing from land to implement the planning permissions granted in 2018. It acknowledges that this is not extensive but indicates that the IDP policies are securing the removal of some redundant glass sites and restoration of the landscape. As stated in the IDP, land planning alone cannot provide a comprehensive solution for the removal of redundant glasshouses and ancillary structures. The SLUP intended a more aggressive approach to their removal and sets out several mechanisms that could be explored by the States. Although these go beyond the scope of land use policies in the IDP the Committee recommends that further measures will need to be considered by the States if effective clearance is to be achieved.

The SLUP requires the appropriate provision of parking in new developments but also states that opportunities should be explored to minimise the negative impacts of car parking, particularly within the Main Centres. The 2018 AMR shows that the policy for private parking contained in the IDP, and detailed consideration of sites through Development Frameworks, is applying maximum standards and promoting the use of alternative modes of transport. The Committee would welcome more detailed monitoring about the effectiveness of applying the maximum parking standards in Main Centres in facilitating the vision of the On-Island Integrated Transport Strategy.

In considering the performance of the SLUP policies and the IDP in terms of delivering them, it is useful to have additional monitoring relative to the 2017 AMR to establish where new residential development is located within the Main Centres and whether it is on green field or brown field sites, and the location of residential development within the Main Centres and Main Centre Outer Areas boundaries. The Committee is pleased to note that its recommendations to the DPA last year in this regard were included in the 2018 AMR and it would like to see continued monitoring of these aspects.

The Authority has also asked the Committee to advise whether it has identified any need for the States to amend the SLUP. The Committee has concluded that the high-level and strategic nature of the SLUP means that it has the flexibility to consider changing patterns of development and the Island's changing demographic profile over its 20 year life. It can continue to ensure that the Island can adapt to accommodate sustainable development and growth in the longer term in response to changing economic, social, and environmental circumstances. The purpose and core objectives of the SLUP remain consistent with the Policy & Resource Plan's 20 year vision and its priorities. There is no evidence that the SLUP and its spatial strategy are not supporting, or are hindering delivery of, the States priorities. The SLUP is delivering the intention of the States and there is no evidence of a need to re-visit the States' decisions on the policy principle on the spatial distribution of development.

In 2018, the Committee decided to refer its conclusions about the effectiveness of the SLUP to the Policy & Resources Committee for information. However, it notes that the DPA has committed to submit the 2018 AMR to the States for debate (with amendable propositions) in the current political term and any comments the Committee makes in response to this consultation on the AMR will be included in the policy letter. In view of the conclusions on the continued effectiveness of the SLUP, as evidenced through the AMR, and the ability for the States to debate the AMR in the near future, it is not necessary to refer the Committee's conclusions to the Policy & Resources Committee.

Thank you once again for giving the Committee the opportunity to comment on your report.

Yours sincerely

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

APPENDIX 2 – DEVELOPMENT & PLANNING AUTHORITY ACTION PLAN

DEVELOPMENT & PLANNING AUTHORITY ACTION PLAN 2019

Development & Planning Authority

Foreword by the President of Development & Planning Authority

In December 2018, the first Annual Monitoring Report was debated by the States of Deliberation. Whilst that factual report was confirming how the policies were working as required by the States' approved Island Development Plan 2016, there were many voices, both in the Assembly and in the public, who were indicating a general concern about the policies themselves.

Having only had one year of statistics and evidence to work on, the Development & Planning Authority (D&PA), or indeed the Committee *for the* Environment & Infrastructure and the Policy & Resources Committee, saw no reason to advise the States that the policies as approved were not working. However, those voices of complaint have not fallen on deaf ears and the D&PA have been working on an Action Plan since December 2018, to address some if not all of those concerns.

This document sets out those actions including how the responsibilities in the Island Development Plan are being enhanced, some quick wins and how we intend to communicate the response we have made. Whilst the draft was initially approved in early May, this final version of the Action Plan was endorsed by the Committee on the 12th June 2019.

The work we, as politicians, have done and the daily running of the Planning Service cannot be done without the support, knowledge and diligence of the staff for which we are all grateful.

Dawn Tindall
President, Development & Planning Authority

Purpose

This Action Plan sets out the D&PA's response to the calls for change both in the IDP policies and the way in which the D&PA makes decisions on those policies. It sets out the background to the creation of D&PA's role and the Island Development Plan (IDP)[1]. It also reflects on the way it monitors the IDP, the basis of recommendation for any change and the way it makes decisions on those policies both in respect of specific planning decisions and development frameworks.

Background

D&PA's Mandate

The D&PA was set up in 2016 as a result of the States Review Committee's review of government. Its mandate states it is:

Responsible for planning applications, building control, protected buildings, protected trees, Island Development Plan, conservation and design and planning policy. These were previously functions of the Environment Department.

- To advise the States on land use policy and to develop and implement land use policies through development plans and any other relevant instruments.
- To determine development applications of all kinds, including planning, building control, protected buildings and scheduled sites.
- To maintain and keep under review schemes of delegation in order that only the most contentious or high profile or atypical development control applications are referred to the elected members of the Authority, and when they are so referred to ensure that they are heard at open planning meetings held in public.
- To exercise powers and perform duties conferred on the Authority by extant States' resolutions, including those resolutions or parts of resolutions which relate to matters for the time being within the mandate of the Development & Planning Authority and which conferred functions on the former Environment Department.
- To fulfil the responsibilities and operational functions set out below.

Operational functions arising out of planning legislation (except those that relate to planning inquiry administration), include enforcing planning legislation, operational functions relating to preparing development plans, subject plans, local planning briefs, guidance notes, development briefs and frameworks, administering planning applications and pre-application advice requests, making building regulations and Guernsey technical standards, administering building regulation applications and pre-application advice requests, conservation and design advice, administering statutory registers of protected buildings and protected monuments, administering tree protection orders and functions in relation to sites of special significance and conservation areas, immunity

[1] https://www.gov.gg/CHttpHandler.ashx?id=104804&p=0

certificates and property searches, Salles Publique, public building and public entertainment inspection and licencing and clearance of ruins.

Island Development Plan

As part of the mandate, the D&PA brought a policy Letter to the States in October 2016 recommending the introduction of the Island Development Plan (IDP). This Plan was approved unanimously, albeit after a then record number of amendments, and came into effect on the 2nd November 2016.

The IDP is a Development Plan, prepared by the D&PA under section 8 of the Land Planning and Development (Guernsey) Law, 2005 (the 2005 Law), which sets out the land planning policies for the whole of Guernsey in a single document. It replaced both of the Development Plans, the Urban Area Plan and the Rural Area Plan, which were prepared under strategic policies that were over 10 years old and out of date.

The IDP sets out the factors that will be taken into account by the D&PA under that Plan in reaching decisions on applications for planning permission. In conjunction with the provisions under the 2005 Law, the planning policies of the IDP determine how development proposals should be assessed. The Land Planning and Development (Plans) Ordinance, 2007 states that a Development Plan has a ten year lifespan which can be extended by resolution of the States of Guernsey.

Monitoring of the IDP

The IDP is a plan rather than a strategy and as such contains for the first time in a States' plan the requirement for the monitoring of the policies. The monitoring is undertaken to ensure that the IDP remains effective and relevant and to make necessary adjustments if the monitoring process reveals that changes are needed. This enables the IDP to maintain sufficient flexibility to adapt to changing circumstances.

Monitoring is required to provide a detailed understanding of the performance of planning policies in the delivery of the objectives of the Strategic Land Use Plan (SLUP), other States of Guernsey objectives and the purposes of the 2005 Law. The monitoring process helps to determine whether there is a need to review the SLUP and/or undertake a partial or full review of the IDP or prepare a new statutory Plan.

The D&PA measure the performance of the IDP by assessing how effective its policies are in delivering its Principal Objectives, as set out in Part Two of the IDP. A set of key indicators and targets have been developed to allow direct and indirect effects to be monitored. Indicators provide a consistent basis for monitoring and a guide to overall progress to establish the basis for identifying where the IDP may need to be strengthened, maintained or changed in some way.

The SLUP states that "to ensure the Development Plans successfully deliver the land use objectives of the States, as set out within this Strategic Land Use Plan, the Strategic Land Planning Group (now

the Committee *for the* Environment & Infrastructure) will work closely with the Environment Department (now the Development & Planning Authority or D&PA) to monitor key Development Plan policies in order to assess their robustness, continued relevance and effectiveness".

The D&PA produces regular monitoring reports to the Committee *for the* Environment & Infrastructure setting out how the IDP is satisfying specific economic, social and environmental objectives of the States.

These Monitoring Reports are provided at quarterly intervals and on an annual basis consistent with the monitoring and review provisions of the SLUP. In line with the statutory requirements placed on the D&PA in the SLUP but without specific timelines, section 5 of the 2005 Law requires the Committee *for the* Environment & Infrastructure to consider whether the SLUP needs amending only from 'time to time'. This section of the Law was drafted flexibly so as not to impose a particular timeframe for review of the SLUP. Although there is currently no requirement in Law or the Policy & Resources Plan for the SLUP to be reviewed more frequently, the Committee *for the* Environment & Infrastructure, in response to the first AMR, decided it was important to update the Policy & Resources Committee about the delivery of the SLUP objectives as part of the monitoring process.

The frequency of the reporting process will ensure that the D&PA can respond efficiently to changing circumstances and take early action to overcome barriers to delivery, or review policy approaches to meet changing circumstances. The objectives for the monitoring reports will be to:

- assess the implementation of the SLUP policies through the IDP policies and the management of development;
- identify and remove any blockages to the delivery of sustainable development for which provision is made within the SLUP;
- identify potential revisions required to the SLUP or IDP to ensure the objectives of the States are adequately satisfied by the land use planning system.

Effective monitoring requires input and feedback from other States' Committees, stakeholder groups and the public. The SLUP requires IDP monitoring reports to indicate the responses of other States' Committees and members of the public to the implementation of policies within the IDP and whether any need for policy change has been identified. The D&PA will liaise with other relevant bodies to produce the Monitoring Reports. Monitoring is also important to enable communities and interested parties to be aware of progress. The monitoring reports are made publicly available.

The full details of the requirements for the quarterly and annual monitoring reports and the data relied upon are in Chapter 21 of the IDP and the reports are at https://www.gov.gg/planningpolicy

Current Means of Updating and Review of the IDP

The effectiveness of the policies in the IDP are continuously monitored throughout the IDP period. If, through monitoring, it appears that policies are not effective at delivering the objectives of the States of Guernsey, as set out in the SLUP, the following mechanisms may be triggered:

- review of the relevant policies of the IDP;
- provision of updated or new guidance or evidence as required;
- review of housing land supply and allocated sites for housing;
- review of employment land supply and land allocated for employment uses;
- action to help bring forward sites for development, wherever possible in partnership with landowners and developers;
- action to help secure the timely provision of infrastructure.

The IDP has a ten year lifespan. In accordance with the requirements of the SLUP the IDP identifies a minimum five year land supply for housing. The SLUP also requires the provision of a comprehensive range of land opportunities for employment uses. Therefore, although there will be regular monitoring, there will be a review of housing land supply and employment land supply after five years following formal adoption of the IDP by the States of Guernsey, unless monitoring indicates a more urgent need to review the land supply sooner.

The five year review of housing land supply and employment land supply will include comprehensive reviews of key aspects of the evidence base. The five year review will assess the appropriate level of provision of land for housing development and employment related development for the remainder of the IDP period and will include the comprehensive review of the Strategic Housing Land Availability Assessment and the Employment Land Study.

An annual review of the Strategic Housing Land Availability Assessment will also underpin monitoring of the performance of the IDP policies against the required two year 'pipeline' supply of available housing land. A review of the IDP may potentially be triggered where there is not a two year supply of suitable housing land in the 'pipeline'.

Where a review of the IDP is considered necessary, any change to policies would be subject to the full inquiry procedure set out under the planning legislation; this may include an Environmental Impact Assessment as part of the review and the accompanying Environmental Statement would be updated accordingly.

The D&PA's Action Plan

Overview

Having reviewed the Annual Monitoring Report 2017 (the 2017 AMR)[2] together with various reports for Quarter 1 to 3 of 2018, the D&PA concluded that the policies were working in accordance with the States' approved IDP. However, it was also clear from the representations received in respect of planning applications, the comments in media together with the debate in the Assembly on the 2017 AMR that there was discontent in some quarters in the way that some of those policies were perceived to be working.

[2] The report on the IDP for the period 2nd November 2016 to December 2017

Having examined Hansard of the December 2018 debate in detail, the President of the D&PA produced in March 2019 an Action Plan (of which this is the final version). It sought to address the concerns raised from all sources in a proportionate and cost-effective manner. Since the production of the Action Plan, many conversations have been undertaken and feedback has been received which has helped refine the action which the D&PA has already taken or will take. The original position and the position as at the date of this Plan is indicated below.

Issues Identified

Role of the D&PA

There has been much discussion on whether the D&PA should be given more discretion in the setting of policy, production of Supplementary Guidance and in the consideration of planning applications.

Conversely, the President of the D&PA has questioned whether the D&PA should consist of elected officials at all and for decisions on planning applications to be made by the Planning Service with appeals from those decisions to the Planning Panel. Alternatively, if the D&PA is to continue with such involvement, the President has called for a more robust level of training than previously provided.

The D&PA considers that this reflection on the role of the D&PA is important and looks forward to the outcome.

Actions:

1. The D&PA will liaise with the States Assembly & Constitution Committee (SACC) in respect of training to be provided generally to candidates and/or Deputies at the time of the election in 2020 in respect of quasi-judicial decision making.
2. The D&PA will scope out a more extensive training programme for the new members of the D&PA after the election in 2020 to compliment what is provided by SACC.

Planning Framework

Guernsey's present planning framework is based on legislation which was introduced in 2009 when the 2005 Land Planning & Development Law came into force. This was followed by the SLUP which was approved by the States in November 2011 and the IDP in November 2016. The IDP not only has to be consistent with the SLUP but it also must reflect other States' strategies and policies such as the States of Guernsey On-Island Integrated Transport Strategy and Action Plan for Guernsey (Minority Report), Guernsey Coastal Defence Flood Strategy 2013 and any relevant States of Guernsey strategy for visitor accommodation as well as delivering the land use aspects of the States' Priorities set out in the Policy & Resource Plan.

Supplementary Guidance, whilst not approved by the States, is also a material consideration for planning decisions and comes in the form of Development Frameworks and other guidance issued by the D&PA.

Other jurisdictions such as Jersey[3] have similar planning frameworks and others, such as the UK, have more layers and a greater number of bodies which can make planning policy. In the case of the UK, this can mean that some aspects of planning policy are not well aligned with one another. A certain element of discretion is, therefore, necessarily built in to the legal framework to cater for this.

Whilst Guernsey's IDP is required by statute to be aligned with overarching policy, the policies are necessarily complex in order to set out what type of development would be approved and what would not in a multitude of different circumstances. As development comes in so many forms and to so many tastes, this ability to set out in a given scenario a reasonable expectation of whether it will be approved provides consistency and an element of certainty for the applicant and objector reassuring them that they will be treated fairly and with equity.

The question of whether the planning framework can be simplified arose in the AMR debate. This is not the first time this has been considered as Commerce and Employment Department's 2014 Economic Development Framework stated that they would look at barriers to business which included reviewing the planning process. They produced the Red Tape Audit in 2015 and, whilst the IDP was adopted, not all recommendations in the Audit were and so the Committee *for* Economic Development have begun a review of the Red Tape Audit to put those recommendations into action.

As well as the Red Tape Audit, the overarching legal framework is due for review. The overarching Law, whilst it did not commence until 2009, was first approved in principle by the States in 2002. It is, therefore, due for a review.

Whilst the planning framework is complex, it still contains an element of subjectivity and requires, on the whole, professional advice to ensure that the processes and policies are followed. This free advice from the Planning Service is to applicants in the form of pre-application meetings. It is also available to objectors but, despite that, this service is mainly used by applicants in respect of particular planning applications.

Although the Red Tape Audit Review is underway, the review of the planning framework as a whole may take some time so the D&PA has decided to look at a means of redressing the balance by focusing on assisting those who wish to object to a planning application and make representations to an inquiry.

Actions:

1. The D&PA will liaise with the Committee *for* Economic Development to understand the outcomes from the review of the Red Tape Audit, to implement them as a matter of urgency where possible.

[3] https://www.gov.je/planningbuilding/lawsregs/Pages/default.aspx

2. The D&PA will scope out the review of the Planning Law with a view to returning to the States with a Policy Letter in 2020.
3. The D&PA have created a Communication Plan which includes the presentation of a series of workshops (see later).

Infrastructure

One particular plan which the States identified as necessary to inform the IDP which has yet to be produced is the Infrastructure Resource Plan (now called the Long Term Infrastructure Investment Plan, which is now a priority in the Policy & Resource Plan). This Plan will identify what Guernsey needs in terms of associated structures and facilities to deliver current and future services and policies and will facilitate decision making in respect of essential infrastructure investment.

In the absence of a States-agreed Long Term Infrastructure Investment Plan and in accordance with the SLUP, Section 20.1.4 of the IDP makes provision for new infrastructure while seeking to support and make better use of existing infrastructure to reduce overall demand and safeguarding some areas of land for possible future key infrastructure requirements.

On a more granular level, each planning application takes into account in a limited manner the local infrastructure and, depending on the extent of the area covered, certain draft Development Frameworks require detailed Traffic Impact Assessments (TIAs) such as the one for the Draft Saltpans Development Framework[4]. Such TIAs, provided by the applicants or landowners, will inform future frameworks and applications.

However, certain aspects of the local environment, such as Ruettes Tranquilles, do not have policy or statutory footing enabling the D&PA to consider them in planning decisions to the extent they would wish.

Actions:

1. The D&PA will liaise with the Committee *for the* Environment & Infrastructure to support the production of the Long Term Infrastructure Investment Plan or its equivalent
2. The D&PA will continue to identify local infrastructure requirements and where reasonable and appropriate incorporate them into Development Frameworks or as conditions in respect of planning applications and, where reasonable and proportionate, require TIAs to be provided.
3. The D&PA will liaise with both the Committee *for the* Environment & Infrastructure and the Committee *for* Home Affairs to identify what statutory protection can be achieved for the Ruettes Tranquilles
4. The D&PA will liaise with other Committees as appropriate to identify aspects which the D&PA believe could be taken into account in planning applications and Development Frameworks if they had a policy or statutory footing.

[4] https://www.gov.gg/CHttpHandler.ashx?id=118706&p=0

Review of the IDP

As mentioned above, the IDP identifies the need for a five year review to assess the appropriate level of provision of land for housing development and employment related development for the remainder of the IDP period including the comprehensive review of the Strategic Housing Land Availability Assessment and the Employment Land Study. This five year review can be brought forward if the monitoring indicates a more urgent need to review the land supply sooner.

The strategic Housing Indicators are indicating at present a reduced requirement from when the 5 year supply was identified in the IDP. Taking this into account after only one year of monitoring and since the level of land supply has not fallen to a level of concern, the D&PA does not consider that an urgent need has been identified that would warrant earlier consideration. The D&PA has considered whether to bring forward the review but due to the pressure on resources, the statutory requirements and the desire to ensure that local planners are the ones undertaking the review, the first review necessarily will be in 2021. The D&PA has also considered whether it should be altered to a three yearly cycle and, whilst that is not possible in this cycle, the timeline for future reviews will be considered at the five year review.

The D&PA, in accordance with the IDP has started to scope out the requirements for the five year review. As a review of the level of the provision of land for housing development and employment related development will require a planning inquiry, the D&PA has considered ensuring this exercise is best value for money and will take the opportunity to consider a wider range of elements of the IDP. These will include:

Whether brownfield sites should be prioritised before greenfield sites in Main Centres and/or Main Centre Outer Areas and/or Local Centres

Whilst the IDP places at a high level an emphasis on, and encourages the development of, brownfield sites, certain greenfield sites were previously identified as Housing Target Areas for decades and remain under the IDP allocated as housing sites. Whilst two open greenfield areas of land within the Main Centres and Main Centre Outer Areas have come forward as windfall sites[5], on the whole sites for which Development Frameworks have been approved are derelict former glasshouse sites.

Whilst political cycles have often put the building of affordable homes as a higher priority, currently the view has been expressed by some that the brownfield sites should be given greater priority and conversely no greenfield sites should be built upon.

However, the definition of greenfield sites is in the IDP which says:

“Open land that is not developed other than for agricultural, horticultural or outdoor recreation or informal leisure and recreation purposes. Glasshouses are regarded as being greenfield sites as they are required to be treated as agricultural land under the Land Planning and Development (Guernsey) Law, 2005.”

[5] Le Maresquet and Camp Dolent

It would, therefore, appear appropriate to agree upon whether this definition should be amended to reflect the different priority between those which are derelict glasshouse sites and other greenfield sites which includes redundant glasshouse sites in good order. Whilst this was given consideration in 2011[6], the D&PA consider it worthwhile reconsidering in relation to the IDP at the five year review.

Important Open Land

As well as considering the priority to be given to development of brownfield land over greenfield, the D&PA also believe consideration is warranted as to whether greater protection from development should be given to other greenfield sites in the Main Centres, Main Centre Outer Areas and Local Centres. This may be by the extension of the designation of certain areas of land as Important Open Land.

The D&PA recommended to the States at the time of the debate on the IDP that land at Mont Arrive be included as Important Open Land and so protected from development. At the time, there were no amendments to the draft IDP put forward to include other areas of land as Important Open Land but the D&PA considers the five year review is an opportune time to consider the inclusion of further land.

Agriculture Priority Areas

The D&PA is very aware that sufficient land needs to be designated for agriculture, not only for the agricultural industry but also acknowledging the important role agriculture plays in managing Guernsey's rural landscape and open land. Unlike Important Open Land, at the time of the debate of the draft IDP, there were amendments put forward to designate further land as APAs. The D&PA considers that the five year review is an opportune time to give further consideration as to whether APAs need to be extended.

Assess effects of land-banking

There has been much criticism of individuals who hold onto their land in the hope of being able to develop or to increase its value whether this be through a change in the IDP or the ability to develop derelict glasshouses. The D&PA considers that the five year review is an opportune time to give further consideration to the impact of, and whether we should seek to inhibit, land-banking.

Affordable housing – GP11

Much to the disappointment of the D&PA, at the time of the debate of the draft IDP as a result of a successful amendment, the draft GP11 was replaced with the following:

[6] Article 10 of Billet XIX Subject Strategic Land Use Plan - Amendment "iv. confining development to brownfield sites except in exceptional circumstances" which lost 30 votes Contre, 14 Pour, 1 Abstained and 2 Not Present

"GP11 - 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 in line with the following:

- 20 or more dwellings but fewer than 25 dwellings: 26% of the developable part of the site, but reduced to 11% in the first year, 16% in the second year and 21% in the third year after States' adoption of this Plan;
- 25 or more dwellings but fewer than 30 dwellings: 28% of the developable part of the site, but reduced to 13% in the first year, 18% in the second year and 23% in the third year after States' adoption of this Plan;
- 30 or more dwellings: 30% of the developable part of the site, but reduced to 15% in the first year, 20% in the second year and 25% in the third year after States' adoption of this Plan."

The effect has been that no affordable housing has been provided as a direct result of GP11. It has also meant that the following successful amendment on tariffs will only take effect when 20 new units are developed which would negate the potential benefits of a tariff system. The D&PA has therefore not had reason to take this back to the States.

"To note that Policy GP11 of the Island Development Plan makes permission to construct dwellings subject, in certain circumstances, to a proportion of the developable area being allocated for affordable housing; and to direct the Development & Planning Authority, in consultation with the Committee for Employment & Social Security and the Committee for the Environment & Infrastructure, to examine the case for an alternative requirement for developers to make a tariff payment equivalent to the value of the land which Policy GP11 would require to be set aside for affordable housing; and to direct that by no later than the 30th of April, 2017 the Authority shall submit a policy letter on this matter together with any propositions which it considers appropriate."

It is, therefore, the intention of the D&PA to include, at the five year review, a reconsideration of the current thresholds of Policy GP11 and also the application of tariffs in accordance with the above amendment.

Visitor Accommodation

Whilst the Committee *for* Economic Development is responsible for tourism, both that Committee and the D&PA have been considering the effects of the policies in relation to visitor accommodation. As the draft IDP was amended to make it more difficult for visitor accommodation to leave the market than the original draft proposed and, in the absence of any relevant States of Guernsey strategy for visitor accommodation, the D&PA propose to consider the question of visitor accommodation at the five year review.

Action:

The D&PA will scope out the five year review to also include:

- Whether brownfield sites should be prioritised before greenfield sites in Main Centres and/or Main Centre Outer Areas and/or Local Centres, and if so how this might be achieved

- Important Open Land
- Agriculture Priority Areas
- Assess effects of land-banking
- Affordable housing – GP11
- Visitor accommodation.

Development Frameworks

Development Frameworks are specific guidance prepared for sites by the D&PA, as part of the proactive and enabling ethos of the IDP. In some cases, the IDP now requires Development Frameworks where Statutory Plans such as Local Planning Briefs were previously required. This represents a simplification of the process which previously existed, which would have previously involved significant resources being spent on planning inquiries and referral of proposals to the States.

A fundamental principle of Development Frameworks is that they provide guidance required to ensure the comprehensive development of land. This ensures that finite land resources are used efficiently and effectively, and that the disadvantages of inefficient piecemeal development are avoided.

Importantly, a Development Framework can be a catalyst for bringing positive development forward and will help to deliver high quality development that is best suited to the site and its surroundings. The Development Framework process enables a deeper understanding to be gained of the context, opportunities and constraints of a particular site, for example in relation to heritage or traffic matters. This understanding and analysis is reflected in the development principles set out in the document and leads on to a better design and quality of development on the ground.

Development Frameworks provide prospective developers with greater certainty as to what form of development is likely to be permitted on a particular site, as broad elements such as density and site opportunities and constraints can be established and agreed through this process, reducing potential delays at the planning application stage. It also enables communities to feedback on what is proposed during the consultation process.

Development Frameworks are required for Regeneration Areas, such as Leale's Yard and the Bordage/Mansell Street, and to bring forward some development of strategic importance and areas safeguarded for strategic purposes.

Planning permission is extant in respect of Leale's Yard until August 2019, however, as the owners have indicated that the permission will lapse, scoping has been undertaken to start work on the draft Development Framework in June. The funds for doing so have been identified through a potential surplus in the 2019 budget but, in the interest of prudence, a request has also been made to P&R for funds from the Budget Reserve if the surplus does not materialise.

Similarly, the D&PA is keen to bring forward the Development Frameworks for the other Regeneration Areas and a request has been made for the D&PA's Budget for 2020 to include funds to do so.

Whilst the Development Frameworks are essential for Regeneration Areas and other allocated or designated areas within the IDP, the D&PA, having taken into account feedback both from developers and representors, believes their use in respect of other areas of land needs to be reassessed. A briefing paper on the policy for the use of Development Frameworks is being brought to committee in the next month.

Actions:

1. The D&PA will draft the Development Framework for Leale's Yard
2. The D&PA, if the Budget 2020 application for funds is successful, will scope out the preparation for Development Frameworks for other Regeneration Areas
3. The D&PA will reconsider the policy for Development Frameworks including:
    - assessing their usefulness
    - re-evaluating the criteria for development frameworks in respect of the size, inclusion of land in different ownership, time it can take, communication of consultation and results
    - identifying the means and timeline for improvements in process.

Communication

The D&PA is developing a Communication Plan in recognition of the importance of keeping the public well informed about both specific planning matters and the wider role of the States' planning policies and the IDP. The Communications Plan includes the introduction of a series of regular workshops from the second half of 2019 on matters such as Community Plans, how to make representations into the planning process and matters relating to the Parish Douzaines' role in the planning process. It is also proposed to produce a set of Frequently Asked Questions relating to matters raised in the last AMR debate which is nearing completion and will be published shortly.

As well as the continuation of the publication of the Quarterly and Annual Monitoring Reports, and the underlying evidence on which they are based, there will also be an online Dashboard of current important facts such as the up to date amount of Agriculture Priority Areas which has been permitted to be included as domestic curtilage – which in 2018 was 0.08% or 12.8 vergees.

The Communications Plan will be developed further with support from the Communications team. Discussions are taking place to increase the dedicated support within that team for the D&PA.

Action:

To produce a Communication Plan which includes

- Hold regular workshops, drop-ins and open days to engage the public on Community Plans, how to make representations into the planning process[7] and matters relating to the Parish Douzaines' role in the planning process
- FAQs based on the AMR debate

[7] Including the presentation of objections at Open Planning Meetings, the process for which is currently under review

- Review media engagement to ensure communication is as proactive as possible, including use of social media and gov.gg website
- Increase liaison with other Committees, Deputies and the Douzaine in addition to the AMR such as consultations on specific planning applications, development frameworks and the Seafront Enhancement Area.

Resources

The Action Plan proposes to address the majority of the matters described using current resources, particularly the five year review of the IDP, and within the existing planned timescales for these. No additional resources for those elements which are to be addressed within the five year review of the IDP will, therefore, be required.

A funding request has been made in relation to the production of Development Frameworks for the Regeneration Areas as described above.

Some limited additional funding will also be requested through the annual P&R budget process for implementation of the Communication Plan, particularly for initiatives such as to raise awareness of Community Plans and enhance public understanding of the planning process.

Feedback

We would value your feedback on the Action Plan and issues discussed within it. You can do this by contacting us using the details below.

Email: planning@gov.gg

Telephone: 01481 717200

Address: The Office *of the* Development & Planning Authority
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GY1 1FH

Appendix 1 – Summary of Actions

The D&PA will:

- liaise with the States Assembly & Constitution Committee (SACC) in respect of training to be provided generally to candidates and/or Deputies at the time of the election in 2020 in respect of quasi-judicial decision making;

- scope out a more extensive training programme for the new members of the D&PA after the election in 2020 to compliment what is provided by SACC;

- liaise with the Committee *for* Economic Development to understand the outcomes from the review of the Red Tape Audit, to implement them as a matter of urgency where possible;

- scope out the review of the planning Law with a view to returning to the States with a Policy Letter in 2020;

- liaise with the Committee *for the* Environment & Infrastructure to support the production of the Long Term Infrastructure Investment Plan or its equivalent;

- continue to identify local infrastructure requirements and where reasonable and appropriate incorporate them into Development Frameworks or as conditions in respect of planning applications and, where reasonable and proportionate, require TIAs to be provided.

- liaise with both the Committee *for the* Environment & Infrastructure and the Committee *for* Home Affairs to identify what statutory protection can be achieved for the Ruettes Tranquilles;

- liaise with other Committees as appropriate to identify aspects which the D&PA believe could be taken into account in planning applications and Development Frameworks if they had a policy or statutory footing;

- scope out the IDP five year review to also include
    - Whether brownfield sites should be prioritised before greenfield sites in Main Centres and/or Main Centre Outer Areas and/or Local Centres, and if so how this might be achieved
    - Important Open Land
    - Agriculture Priority Areas
    - Assess effects of land-banking
    - Affordable housing – GP11
    - Visitor accommodation;

- draft the Development Framework for Leale's Yard;

- if the Budget 2020 application for funds is successful, scope out the preparation for Development Frameworks for other Regeneration Areas;

- reconsider the policy for Development Frameworks including:
    - assessing their usefulness
    - re-evaluating the criteria for development frameworks in respect of the size, inclusion of land in different ownership, time it can take, communication of consultation and results
    - identifying the means and timeline for improvements in process;

- Produce a Communication Plan which includes:
    - regular workshops, drop-ins and open days to engage the public on Community Plans, how to make representations into the planning process[8] and matters relating to the Parish Douzaines' role in the planning process
    - FAQs based on the AMR debate
    - review of media engagement to ensure communication is as proactive as possible, including use of social media and gov.gg website
    - increased liaison with other Committees, Deputies and the Douzaine in addition to the AMR such as consultations on specific planning applications, development frameworks and the Seafront Enhancement Area.

[8] Including the presentation of objections at Open Planning Meetings, the process for which is currently under review

APPENDIX 3 – PROPOSED AREAS OF FOCUS FOR THE FIVE YEAR REVIEW OF THE ISLAND DEVELOPMENT PLAN

Statutory Requirements for the Five Year Plan Review - Scope of Areas of Focus included in Proposition 1

Housing Land Supply and Policy

The IDP has a Plan Objective to 'ensure access to housing for all' and generally supports the development of new dwellings in the Main Centres, Main Centre Outer Areas and Local Centres. New dwellings are also supported Outside of the Centres, in certain circumstances, through sub-division of existing dwellings or through conversion of redundant buildings.

Consistent with the SLUP, the IDP makes provision for the Island's housing requirement for the first five years of the IDP period and 15 sites have been allocated in the IDP specifically for housing development, all within either a Main Centre or Main Centre Outer Area which, combined with an allowance for windfall[1] development on other sites and existing permissions, make up the five year requirement. The SLUP requires that before the end of this five year period, the housing policies of the IDP are reviewed in order to assess the appropriate scale of provision for housing that is required for the remaining duration of the Plan, and to ensure they are delivering the spatial strategy.

The housing requirement is based on the States' Strategic Housing Indicator. When the IDP was adopted in November 2016, this indicator (or target as it was known as then) was set at making effective provision for 300 new dwellings each year. In accordance with the SLUP the IDP therefore makes effective provision for the annual housing requirement through putting in place designations and policies which allow the required number of planning permissions to be granted.

The IDP acknowledges that the indicator will be subject to review by the States from time to time. In July 2018, the States resolved to agree the States' Strategic Housing Indicator be set at "creating" 635 new units of accommodation between 2017 and 2021, with a plus or minus variance of 149 new units to give the flexibility to react to market changes. This represented a shift in the strategic annual housing requirement indicator from numbers of planning permissions for new residential units to numbers of new residential units completed and built. This did not change the requirement for the IDP to put in place policies for the effective provision of the annual housing requirement through planning permissions granted. In addition, in accordance with the SLUP (Policy SLP13), the Authority is required to demonstrate through regular monitoring that there is a maintained minimum 2-year supply of housing permissions within the 'pipeline' that

[1] Windfall Sites are undesignated sites that come forward for development during the IDP period which are not specifically identified in the IDP for that purpose, but for which policies exist to support its provision.

are able to come forward for development at any one time (known as the pipeline supply) so that effective provision is made to meet the requirements of the strategic indicator. Whilst the calculation of the 2 year pipeline supply is based on the Strategic Housing Indicator, which now relates to the completion of dwellings, it is used for planning purposes to provide a test to ensure there is sufficient land available and planning permissions for housing in place to meet recognised housing needs. Given the current annual indicator for the completion of 97-157 additional new dwellings per year, the pipeline supply requirement equates to planning permissions for at least 194-314 new dwellings (136-230 private market, 58-84 Affordable Housing).

Although the IDP is fulfilling the requirements of the SLUP by putting in place policies which allow for the effective provision of dwellings to meet the indicator requirement, planning permissions do not necessarily result in the housing being built so this does not necessarily mean that the States Indicator is being met. Monitoring to date has indicated that there is a significant difference between the number of planning permissions granted for new dwellings and the number of completions. Whilst recognising that planning policies or an increase in the housing land supply or the number of planning permissions granted cannot force completion of dwellings the Authority will consider the monitoring results and trends as part of its review of the five year housing land supply to see if this identifies significant issues which may need to be addressed by the States with regard to the completion of housing developments and the creation of residential units.

The C*f*E&I's Policy Letter 'Local Market Housing Review and Development of Future Housing Strategy' was debated in July 2018 and a 'Programme of Works' was endorsed that will help inform the development of a revised Housing Strategy for Guernsey. One workstream relates to updates to the Indicator and recommends joint working between the C*f*E&I, the D&PA and the Committee *for* Employment & Social Security (CfE&SS) to achieve this. Accurate, robust and real-time data will be essential in order to be able to ensure that new housing is reflective of the demographic profile of households requiring housing at any one time in accordance with the housing policies of the IDP.

The effectiveness of IDP housing policies to ensure the mix and type of units being built are what the Island requires is therefore dependent upon the successful implementation of the workstream identified by the C*f*E&I. Progress is being made with this workstream, however should a revised Indicator not be agreed by the States in time for the five year review the D&PA will progress using the most up to date information available to it at the time.

The Strategic Housing Land Availability Assessment (SHLAA) was produced in June 2014 and is part of the evidence base that informed the preparation of the IDP. It is effectively a 'stock check' of the supply of potential development sites for housing on Guernsey. It provides information on the suitability and availability of each site; whether the development of a site is considered to be achievable; and if there are any significant constraints to development. It also demonstrates whether there is an adequate supply

of land to meet the Island's Strategic Housing Indicator. A comprehensive update of the SHLAA will form part of the five year review.

There has been criticism of individuals who hold onto their land in the hope of being able to develop or to increase its value whether this be through a change in the IDP or the ability to develop derelict glasshouses. The D&PA considers that the five year review is an opportune time to give further consideration to the extent and impact of, and options to influence land-banking.

IDP policy GP11: Affordable Housing requires 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. To date, under the IDP, Policy GP11 has yet to be relevant to a planning proposal and there has therefore been no land or units provided for Affordable Housing as a direct result of this policy.

The delivery of Affordable Housing since the adoption of the IDP has all been through the Guernsey Housing Association. 57 Affordable Housing units have been permitted under other IDP policies to date. The C*f*E&SS notes that a lack of information around the number of sites coming forward as a result of Policy GP11 and the speed at which States-owned sites become available for housing development make it difficult to plan the future Affordable Housing programme with accuracy.

Policy GP11 has yet to provide any Affordable Housing and as such could be said to be ineffective in achieving the objectives of the SLUP and IDP to deliver Affordable Housing. This is due, in the most part, to the raising of the threshold for the requirement for Affordable Housing, through amendment when the IDP was debated by the States, so that Policy GP11 does not operate as intended when it was drafted. The Policy, and its thresholds, will be reviewed as part of the five year review, including analysis of the potential for an alternative requirement for developers to make a tariff payment equivalent to the value of the land which Policy GP11 would require to be set aside for Affordable Housing.

Any amendment to the Policy will need to be informed by the workstreams under the Housing Strategy to give the D&PA clear direction on the required level of Affordable Housing over at least a 5 year period, the proportion of contribution required from private market development sites, and further guidance on the types of Affordable Housing required.

IDP policies for housing support the development of housing for elderly tenures and care housing, including specialised housing. Proposals for accommodation for high dependency care may fall to be considered under the Social and Community policies of the IDP (as a 'health' use rather than residential) which also provide support for this use. In both cases the policies are guided by the SLUP and the spatial strategy and generally direct development toward the Main and Local Centres.

The 2018 AMR found that there was no new specialised housing permitted in 2018. There were no refusals of any applications for housing or accommodation of this type. No barriers to development of specialised housing have been identified. In response to the AMR, the Policy & Resources Committee queried whether there are barriers to development which may be unnecessarily discouraging private sector development in this area. The five year review will therefore analyse the role of the IDP in facilitating these uses.

In endorsing the 'Programme of Works' set out in the 'Local Market Housing Review and Development of Future Housing Strategy' Policy Letter in July 2018, the States endorsed a work stream to produce an Elderly Tenure Strategy including an assessment of specialised housing and extra care housing requirements. The D&PA has a role in the workstream and it will be important for the D&PA to liaise at an officer and political level with all relevant Committees in order to ensure that the IDP policies remain effective in delivering the land use aspects of elderly tenure housing.

The technical work on housing land supply and policy will be wide-ranging and encompasses a number of inter-connected workstreams. These include a review of the States' Strategic Housing Indicator to establish the need for housing, the demand for housing of particular types, the supply of housing land available and where new housing is needed, the progress of sites and the potential implications of 'land banking', the effectiveness of Affordable Housing policy and the potential for tariffs to contribute to delivery of Affordable Housing, and the adequacy of policies to support the delivery of elderly tenure/specialised housing.

<u>Employment land supply and policy</u>

The IDP makes provision for a range of new employment developments throughout the Island where they make a positive contribution to the sustainability of a strong local economy. The IDP approach to office use is to focus this use in the Main Centres, where there are existing clusters of offices, while recognising the need for large floorplate office space with the allocation of an Office Expansion Area at Admiral Park. The IDP also seeks to retain existing offices in Main Centres but allows for smaller premises under 250m^2 to change to alternate suitable use, to provide flexibility and to address an oversupply of, mainly tertiary, small office space. The change of use of larger substandard office premises to other uses, subject to demonstrating certain criteria, can be considered under the IDP policies.

While the current planning polices reflect the direction of the SLUP, industry feedback suggests that the policy approach seeking existing secondary accommodation to be upgraded to primary quality where feasible may be unrealistic and no longer appropriate. Instead there is general consensus on the need to provide a range of accommodation of different sizes and quality to meet business needs now and in the future. The current flexibility in planning policies to allow for release of any existing stock below a certain size to alternative uses may no longer be appropriate in light of growing demand for small to medium sized high quality units and the continuing surplus of stock

of unsuitable quality.

The IDP approach to industry and storage and distribution reflects the findings of the Employment Land Study, 2014 (ELS) that the Island was at that point over-provided with industrial, storage and distribution premises. In managing change in this sector it is recognised that there remains a need to specifically protect some land for Industry and Storage and Distribution to ensure suitable land is available that can be readily developed for a range of industrial and storage/distribution purposes. The IDP, therefore, seeks to consolidate industry, storage and distribution uses on 4 designated Key Industrial Areas ("KIA") each with an identified expansion area known as Key Industrial Expansion Areas (KIEAs) located in and around the Main Centres.

The 2018 AMR has found that the IDP policies for industry, storage and distribution are still relevant and effective in delivering the requirements of the SLUP and the priorities of the States. The policies are generally delivering in relation to the Spatial Strategy by concentrating development in the Centres but the analysis highlights the need to continue to monitor and review the extent and nature of employment development occurring Outside of the Centres to ensure that policies continue to deliver the Spatial Strategy. The continued appropriateness of a higher level of protection offered by IDP policy for sites on the Inter-Harbour Route has been questioned. The potential for further flexibility in policy requires further research.

A commitment is given in the IDP to undertake a comprehensive review of the 2014 ELS for the five year review. Updates to the ELS have been published for 2017 and 2018 to support the Annual Monitoring Reports.

The review of the ELS will include a review of offices, industry and storage & distribution uses. The review will include modelling of future requirements, analysis of the current portfolio of sites and premises, an assessment of the effectiveness of IDP policies and consultation with stakeholders. In particular, it will examine the extent and type of new industrial and storage development Outside of the Centres in relation to the Spatial Policy, whether the policy protection for office use is still appropriate based mainly on size rather than on quality of accommodation and the policy protection of industry and storage uses in close proximity to the Inter-harbour route.

Commitment given during the Planning Inquiry into the draft Island Development Plan - Area of Focus included in Proposition 1

<u>Areas of Biodiversity Importance</u>

The designation of Areas of Biodiversity Importance (ABI) provides a mechanism to offer a focus on biodiversity and some protection and enhancement of such sites when development proposals are being considered. There are 84 ABIs designated in the IDP including the Foreshore ABI on the basis of their special botanical, scientific or zoological biological diversity. Some of the ABIs support the special interest of a Site of Special

Significance (SSS) by providing either natural buffers or wildlife corridors. 27 ABIs are related to SSSs. In total, the ABIs cover an area of 196 hectares.

IDP Policy GP3: Areas of Biodiversity Importance supports development within an ABI provided that the biodiversity interest of the site has been considered and any negative impacts can be appropriately and proportionately mitigated. The policy does not apply to householder development within the curtilage of a dwelling.

ABI designations that support a Site of Special Significance or the Foreshore were determined following survey and evidence gathering for the IDP. Those designations that were not supporting a Site of Special Significance (SSS) or the Foreshore were based on the 'Sites of Nature Conservation Interest within the Urban Area Plan, 2006' (by La Société Guernesiaise and Environment Guernsey) and the Review of Sites of Nature Conservation Importance in the Revised Rural Area Plan, 2003' that was carried out by La Société Guernesiaise. The former Environment Department acknowledged this evidence base was dated. Therefore a commitment was made during the IDP public Planning Inquiry hearings to re-survey those sites and to carry out Islandwide analysis to identify any additional ABIs.

Technical work is underway. This will provide guidelines and criteria for the selection of ABIs, a survey of ABIs not supporting the Sites of Special Significance to assess their particular biodiversity interest and any threats to it and will provide a recommendation of whether or not each site meets the guidelines and criteria for selection. This will include a review of the 2018 Habitat Survey. The information and evidence provided by this work will enable a more targeted and robust application of the IDP policies, increasing their effectiveness in delivering the intentions of the SLUP and the Biodiversity Strategy.

Additional areas of focus identified in the D&PA Action Plan included in Proposition 2

<u>Development Frameworks' thresholds and process</u>

A Development Framework (DF) provides broad but comprehensive guidance for specific large scale or complex development sites on the basis of the policy principles set out in the IDP. A DF can be a catalyst for bringing positive development forward and help to deliver high quality development that is best suited to the site and its surroundings and gives the opportunity for public consultation about the development of a site at an early stage and before the planning application process.

A DF is a D&PA document and must be approved by the D&PA. However, the intention is that the process of producing DFs is collaborative and a party with an interest in a site / area can provide input to the DF process. This process has been evolving throughout 2017-2019. To help agents provide input, a Planning Advice Note 'Development Frameworks: A Guide for Landowners, Developers and their Agents' was published in October 2018. Key stakeholders are consulted as part of producing DFs depending on

the issues with the site and they are then published for public comment and any views are taken into account prior to adoption. Once approved a DF forms Supplementary Planning Guidance to be taken into account when planning applications for the site are considered.

In some cases, the IDP now requires DFs where Statutory Plans such as Local Planning Briefs were previously required. This represents a simplification of the process which previously existed, which would have previously involved significant resources being spent on Planning Inquiries and referral of proposals to the States.

Concerns have been raised via the 2017 and 2018 AMRs (including feedback from the Guernsey Society of Architects) about the effectiveness of DFs, particularly the thresholds for their requirement, and procedural issues (including resourcing and delays). The D&PA acknowledges that some DFs have taken longer than was ideal and that some sites have benefited more from DFs than others. The D&PA considers that while a DF is a valuable and powerful tool it recognises that, with the benefit of experience of implementing this approach, amendment to the thresholds for DFs may need to be explored.

The technical work will assess the need for DFs, the current approach to them and the impacts of them and will make recommendations for change where appropriate to achieve an effective, proportionate and consistent approach. This will also consider the thresholds and circumstances for requiring a DF, procedural issues and the effectiveness and value of DFs.

<u>Development of greenfield land and prioritisation of brownfield land for residential purposes in Centres</u>

The IDP has to balance the requirement for a supply of land for development with the protection of the most important green spaces. The areas of Important Open Land in Centres designated through the IDP, together with the spatial strategy, at a high level, places an emphasis on brownfield development. Policies do allow for some greenfield sites within the Centres to be developed for housing where this accords with IDP policy. This reflects the SLUP requirement to balance the development demands on land generally and that the SLUP recognises that some greenfield land will need to be identified for housing development.

Concerns have been raised that too much greenfield land within the Centres has been given planning permission, or has an approved DF or is otherwise potentially suitable for development for housing purposes, and this is eroding the character of the Centres and placing demands on local infrastructure. Comments from a number of sources as part of the consultation for the AMR 2018 expressed concern at the potential, through IDP policies, to develop greenfield sites and suggest that some form of sequential test to encourage the development of brownfield or allocated housing sites first could be adopted.

Overall greenfield sites have represented a small proportion of the sites given permission for housing development since the adoption of the IDP. In the Main Centres, greenfield sites given permission represent 0.1% of the total area of the St Peter Port Main Centre and Main Centre Outer Area and 0.02% of the total area of the St Sampson / Vale Main Centre and Main Centre Outer Area. Notwithstanding this the D&PA, in response to concerns raised by Deputies and the public, considers there is merit in including in the five year review analysis of the extent of the issue and what options there may be to prioritise the development of brownfield sites before greenfield sites in Centres for housing purposes. This will include consideration of the conclusions about the housing land supply for the next five years which will have a bearing on the demand for land for housing purposes in Centres.

A number of the allocated housing sites in the Main Centres are derelict former glasshouse sites and therefore considered to be 'greenfield' under the 2005 Planning Law. The five largest allocated sites were previously identified as Housing Target Areas, from 2002, and remain allocated following a review of their appropriateness for allocation in accordance with the SLUP. The D&PA considers that it would, therefore, appear appropriate, as part of the 5 year review, to agree upon whether the definition of 'greenfield' should be amended to reflect a different priority between those which are derelict glasshouse sites and other greenfield sites.

Technical work will analyse the impact of IDP policies on the development of greenfield land for residential purposes in Centres, the availability of greenfield and brownfield land within Centres and will review policy options to ensure the IDP delivers the SLUP requirement for the encouragement of brownfield sites in the interests of the efficient use of land and protection of the natural environment. This work will need to be considered alongside the supply of land required for housing and employment uses and work relating to Important Open Land.

<u>Important Open Land</u>

Within and around the Main Centres and within some Local Centres there are areas of land that provide breathing space within the built environment and, in most cases, offer views across open land. The special qualities of these areas need to be protected from insensitive development that could detract from their value and the amenity that they provide in otherwise built up areas. Therefore the IDP Policies for Important Open Land are restrictive to provide protection from development that would adversely affect the landscape character of the areas and detract from their value as open spaces in otherwise built up or potentially built up environments.

As set out above, there is a perception that too much greenfield land within the Centres has been given planning permission for residential purposes, or has an approved DF or is otherwise potentially suitable for such development, and this is eroding the character of the Centres.

The IDP has to balance the requirement for a supply of land for development with the

protection of the most important green spaces. The 2018 AMR concludes that the policies of the IDP continue to be appropriate, however the plan review is an opportunity for an evidence based review of the criteria / definition of Important Open Land to make sure it is still appropriate and allow consideration of whether there is evidence that some designations need to be added or changed in view of development which has happened over the first 5 years of the IDP.

The D&PA Action Plan sets out that consideration is warranted as to whether greater protection from development should be given to other greenfield sites in the Main Centres, Main Centre Outer Areas and Local Centres. This may be by the extension of the designation of certain areas of land as Important Open Land.

The review of Important Open Land will provide a robust and objective assessment of sites against clear criteria. This will include a review of best practice in assessing the value of open land and adjustment of the methodology for the Guernsey context, a high level analysis of the urban structure and landscape of each Centre, analysis of what is important about each type of open land in a Guernsey context, any amendments/additions to the criteria for Important Open Land and a baseline review and field survey of each Centre.

Agriculture Priority Areas

IDP policies support and prioritise agricultural use within the Agriculture Priority Area (APA). The APA is a policy approach designed to maintain and protect the most important, large areas of contiguous agricultural land and other areas well related to agricultural operations as directed by the SLUP (including redundant glasshouse sites within and adjacent to the APA) by prioritising agricultural use. Such land is expected to remain in (or revert to) agricultural use unless it can be demonstrated that the site cannot positively contribute to the commercial agricultural use of the APA or cannot practically be used for commercial agricultural use without adverse environmental impacts. Outside the APA, agricultural proposals relating to an existing farmstead or agricultural operation are supported, however this is balanced with the development requirements of other legitimate uses as required by the SLUP.

The overall emphasis of SLUP and IDP policy is to balance the protection of sufficient land for agriculture for the industry's current and future needs and recognising the role it plays in countryside management with ensuring land is available to meet other legitimate development requirements. Other policies in the IDP set out the criteria against which changes from agricultural land and buildings to other uses will be supported. These relate to, for example, the extension of curtilage, the conversion of redundant agricultural and horticultural buildings and relevant appropriate uses as set out in the Outside the Centres section of the IDP.

Whilst the policy approach of the IDP is to generally support development for agricultural purposes in the Agriculture Priority Areas, these areas have been broadly drawn and include areas of land and sites which are not currently used for agricultural

purposes and could not be expected to contribute positively to commercial agriculture in the future, for example dwellings and their curtilages. The Agriculture Priority Areas are not intended to safeguard the land for agricultural use if it is not appropriate or is not required for that use.

The 2018 AMR concludes that, from the evidence gathered, the APA designation appears to be working as intended by supporting proposals related to the agricultural industry, including making provision for diversification. This is balanced with allowing other legitimate uses, as required by the SLUP.

The 2018 AMR has shown that planning applications for change of use from agricultural land to domestic curtilage continue to make up the majority of approvals for change of use of agricultural land, and given the number of applications involved, further review has been carried out in the 2018 AMR to ascertain the type of land which is being granted approval to change. The policies appear to be meeting the aspirations of homeowners, but this must continue to be balanced with both the needs and aspirations of the agricultural industry and the general requirement to ensure that development of land does not result in the unnecessary loss of open and undeveloped land which would have an unacceptable impact on the open landscape character of an area. Although current evidence suggests that there remains well in excess of the agricultural land required to meet the current and future needs of the agricultural industries at this time, the 2018 AMR recognises this is still worth monitoring closely to ensure both sufficient agricultural land, and land in the right place, is being provided.

The D&PA notes that sufficient land needs to be designated for agriculture, not only for the agricultural industry but also acknowledging the important role agriculture plays in managing Guernsey's rural landscape and open land. Unlike Important Open Land, at the time of the debate of the draft IDP, there were amendments put forward to extend the APA by including more areas. The D&PA considers that the five year review is an opportune time to give further consideration as to whether the APA needs to be amended. A study of additional data (including historic data) and an analysis of the 2018 Habitat Survey data set will allow more detailed understanding of agricultural land patterns and farming.

The technical work will review and update the baseline evidence for the Agriculture Priority Area (APA) and consider if there is sufficient land within the APA to support the agricultural industry. This will include a review of trends in agriculture and part of this work will focus on the change of use of agricultural land to domestic curtilage.

<u>Visitor Accommodation</u>

The IDP policies for visitor accommodation seek to support existing establishments with flexibility for proposals to enhance the quality and marketability of accommodation and to change the type of accommodation between hotel, guest accommodation, self-catering and other similar visitor accommodation. IDP policies support the development of new visitor accommodation in Main and Local Centres, and also Outside of the

Centres through a change of use of an existing building or conversion of a redundant building.

The States resolved, in approving the IDP, to direct the Committee *for* Economic Development (C*f*ED) to submit a Policy Letter to the States setting out a Tourism Strategy for approval by the States by 31st October 2018. Such Policy Letter was to include:

a) a review of the Visit Guernsey and Chamber of Commerce Strategic Plan 2015-2025; and,
b) an assessment of the current stock of visitor accommodation and the stock of visitor accommodation necessary to support the future viability and growth of the industry.

The C*f*ED published a 'Guernsey Tourism - Ten Point Plan 2020-2025' in February 2020. This includes a review of the Strategic Plan 2015-2025 and provides an update on progress achieved over the past five years. The document sets out the ten priority action plans identified as the key areas of focus necessary over the next five years, for the Committee and its tourism trade and industry stakeholder partners to deliver against the five key strategic aims.

Whilst the C*f*ED is responsible for tourism, both that Committee and the D&PA have been considering the effects of the policies in relation to visitor accommodation. The IDP policies for change of use of visitor accommodation aim to retain the stock of accommodation other than in exceptional circumstances and the policy tests are intentionally strict.

The 2018 AMR concludes that until such time as the States has debated a tourism strategy, the policies of the IDP effectively deliver the requirements of the SLUP and remain relevant. The D&PA does however propose to consider the mechanisms in place to implement the current approach to visitor accommodation as part of the five year review in light of feedback received for the AMRs and experience of implementing the policies.

Technical work will consider if the existing policies are appropriate, the evidence of why change is needed, the potential impacts on other policies and, if required, policy options for delivering the right portfolio of visitor accommodation on the Island including comparison with best practice elsewhere.

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The President
Policy & Resources Committee
Sir Charles Frossard House
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10th February 2020

Dear Deputy St Pier,

Development & Planning Authority Propositions and Policy Letter: The Island Development Plan – Five Year Review of the Island Development Plan

Preferred date for consideration by the States of Deliberation

In accordance with Rule 4(2) of the Rules of Procedure of the States of Deliberation and their Committees, the Development & Planning Authority requests that the propositions and policy letter 'The Island Development Plan – Five Year Review of the Island Development Plan' be considered at the States' meeting to be held on 18th March 2020.

The Development & Planning Authority has a duty to review the Island Development Plan (IDP) within five years. Given the statutory steps involved, a date of 18th March 2020 is required to ensure that the current States is given the opportunity to direct the scope and purpose of the five year review and ensures that the project remains within the committed timeframe (to submit any amendments to the IDP arising from the review for States' consideration by November 2021, five years from the adoption of the IDP).

Yours sincerely

Deputy Dawn Tindall
President, Development & Planning Authority