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CESS-20241004	N/A	N/A	Committee for Employment and Social Security	10/4/2024	https://gov.gg/CHttpHandler.ashx?id=183518&p=0	<p>Preparation of the draft Local Planning Brief (LPB) for the St Peter Port and St Sampson Harbour Action Areas (HAAs) has taken into account, and where possible aligned with and supported, the potential for significant housing developments in close proximity to the St Sampson HAA and makes policy provision for housing development within the HAAs themselves. The gateway policies in the LPB will act as a catalyst and allow development to come forward in the HAAs which supports the existing and future residential population in and around these areas.</p> <p>LPB Policies 3.1, 3.2 and 3.3 propose that development within the HAAs creates areas with coherent and diverse uses which will be complimentary of surrounding activities, will provide facilities and uses for the benefit of the wider community and will avoid the creation of areas with single or minimal uses which are only in use at certain times of the day. Whilst the draft LPB is a high- level policy framework so does not provide detail as to the specific type of housing development which might come forward within these areas (i.e. Affordable Housing and/or private market housing), the LPB would give policy support for the delivery of a range of housing mix, types and tenures and through the principle of encouraging diverse uses, is aligned with this Representation’s suggestion for the LPB to encourage, where possible, the delivery of mixed tenure developments.</p> <p>The preparation of the draft LPB has considered how existing and potential future activities within the St Sampson HAA would best fit together in order to create areas with coordinated and clear uses which maximise the use of space. As shown in Proposals Map B, the creation of the Longue Hougue Marine Industry, Energy and Industrial Zone would enable industrial uses to be relocated away from the immediate harbour area in St Sampson, which in turn allows for the designation of a Mixed Use Regeneration Zone on Northside and The Bridge Core Mixed Use Zone.</p> <p>As set out in LPB Policy 3.3, the Bridge Core Mixed Use Zone will support the ongoing retail, restaurant, café and community focus of the Bridge, and the North of St Sampson Mixed Use Regeneration Zone will be capable</p>

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						<p>of accommodating carefully designed and planned new uses such as housing, bars and restaurants and other activities that improve the enjoyment of the St Sampson harbour. In both cases, the intended outcome of establishing these zones is the creation of spaces which provide diversified employment opportunities and leisure uses for the benefit of the wider community which reinforce the Bridge as a Main Centre.</p> <p>Reinforcing the role of the Bridge as a Main Centre is further strengthened through LPB Policy 6.3, which will support developments that increase greening and biodiversity within the HAAs through the provision of additional trees, planting and other biodiversity measures. This includes the protection or replacement of existing trees and green areas and a net increase of greening and/or tree planting and biodiversity as part of any proposals in a way that is proportionate to its scale and location. LPB Policy 6.3 also establishes support for green spaces that include play space for children, facilitating the potential development of infrastructure to provide diverse uses which again supports the Bridge as a Main Centre.</p> <p>LPB Policy 4.1 establishes support for a new signage and communications strategy for the HAAs that can be used as and when both public and private signage is upgraded or renewed, in order to assist with wayfinding and support consistency of design and materials which will reinforce both HAAs as areas with distinct cultures.</p> <p>Furthermore, LPB Policies 5.1 and 5.2 will support developments which improve access to sustainable and active travel and implementation of the Road User Hierarchy. The developments which would be facilitated by these Policies, such as a mobility hub or improved routes for pedestrians and cyclists, would assist in alleviating any transport related concerns associated with the proposed housing developments in close proximity to the St Sampson HAA.</p> <p>It should be noted that the proposed Policies in the draft LPB have been certified by the Committee for the Environment & Infrastructure as being consistent with the Strategic Land Use Plan. Furthermore, as the draft LPB,</p>

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						<p>subject to approval from the States, will become an addition to the Island Development Plan (IDP), the draft LPB is fully aligned with IDP Policies which will remain applicable to the HAAs where appropriate.</p> <p>In preparing the draft LPB, a flood risk study was undertaken to update estimates for the potential extent of flood risk within the HAAs. This study revealed a potentially significant risk of flooding in the medium to long term which may have implications for some of the housing developments referenced in this Representation. The identified risks associated with increased frequency and severity of flooding led to the inclusion of climate resilience and the natural environment as a key theme throughout the draft LPB and proposed Policies. Whilst it is not within the remit of the draft LPB to propose specific solutions to mitigate flood risk, LPB Policy 6.1 establishes a requirement for appropriate flood mitigation measures, based on the vulnerability of use of development, in order to enable individual developments to come forward within the HAAs.</p> <p>It should be noted that the draft LPB is designed to set out a general planning policy framework and is not intended to identify precise projects to be delivered within that framework. It will be for developers to prepare proposals that align with the framework set in the draft LPB which will be considered by the Development & Planning Authority as per the normal planning application process.</p>
GFSC-20241007	N/A	N/A	GFSC	10/7/2024	https://gov.gg/C/HttpHandler.ashx?id=183520&p=0	<p>The proposed Policies in the draft Local Planning Brief (LPB) for the St Peter Port and St Sampson Harbour Action Areas (HAAs) have been drafted in order to be consistent with the strategic objectives of the States of Guernsey as set out in the On-Island Integrated Transport Strategy (ITS). At the same time the LPB recognises the critical role that the volume and availability of car parking can have in supporting St Peter Port and St Sampson as the islands primary business centres and as main centres generally.</p> <p>Whilst LPB Policy 5.3 seeks to reduce the visual impact of car parking on the harbours and to maximise the potential of key sites for economic, social and environmental uses through reconfiguration and rationalisation of parking, it does not seek a reduction in the volume of parking in these</p>

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						<p>areas. The supporting text to this Policy explains that a change in the balance of parking use with a reduction in long term car parking in the HAAs might facilitate a fairer balance of space for all sectors and users requiring parking but recognises that this issue will require a reviewed approach to parking access and use which needs to be considered in the round as there are a number of important considerations, one of which will be impact on all users, businesses and the financial services industry. This falls outside of the remit of the LPB.</p> <p>LPB Policy 3.2 seeks to achieve more efficient land uses in the HAAs, which may include consolidated and optimised car parking in the St Peter Port HAA such that it better supports the shops and businesses in Town. The intention of the LPB is to encourage proposals for development to explore how to improve parking provision in the HAAs by balancing reduction in the visual and spatial impact of car parking and retaining or improving individuals' ability to access these areas.</p> <p>Whilst the draft LPB acknowledges the importance of being able to access the HAAs by vehicle and of parking provision to the working of the HAAs as parts of the Main Centres, LPB Policies 5.1 and 5.2 are seeking to facilitate infrastructure which will offer greater transport choice, to encourage active and sustainable travel methods and improve implementation of the States Road User Hierarchy, which prioritises pedestrian, bicycle and public transit as methods of transport. The intention of the draft LPB is to provide people with the choice of improved, more reliable and more efficient methods of travelling to and from the HAAs, which may in turn reduce demand for car parking. It is however noted that car parking provision is a critical enabler for businesses in the HAAs and the draft LPB does not seek to reduce the volume of parking in these areas.</p> <p>The proposed Policies in the draft LPB are consistent with Policy SLP37 of the Strategic Land Use Plan, which seeks to ensure a balance between meeting the economic and social objectives of the States and minimising the negative effects of car parking.</p> <p>It should be noted that the scenarios as set out on page 73-80 in the draft</p>

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						<p>LPB do not form part of the Policies or formal guidance of the draft LPB. The scenarios illustrate a limited number of ways that development could come forward in line with the proposed Policies in the draft LPB. Other outcomes are possible and these scenarios do not mean the draft LPB favours any specific proposals for development, nor do the scenarios in any way presume to limit opportunities for growth and change that are otherwise in accordance with the proposed Policies in the draft LPB.</p>
ValeConstables-20241009	Richard	Leale	Vale Constables	9/10/2024	https://gov.gg/C/HttpHandler.ashx?id=183523&p=0	<p>The geographic extent of the St Peter Port and St Sampson Harbour Action Areas (HAAs) was established in the 2016 Island Development Plan. Whilst the Local Planning Brief (LPB), once approved, cannot set Policy for areas outside of the HAAs, the LPB can assist development to come forward outside of the HAAs by enabling infrastructure to be delivered or designating areas for specific uses within the HAAs. The draft LPB has been prepared taking into account the opportunities for synergies with potential future developments outside of, but in the immediate proximity of the HAAs. For example, whilst the LPB cannot set Policy to directly influence the development of Leales Yard, Policies within the LPB, such as LPB Policy 3.3 and 5.1 are aligned with the potential development of Leales Yard by providing wider amenities and transport links which would support that development. It should be noted that a Development Framework for Leales Yard has been prepared and the draft LPB was drafted to align with this Development Framework.</p> <p>LPB Policy 3.1 states that developments will be supported where they bring diversification of uses and activities in a way which is compatible with the heritage, character and scale of each HAA. Whilst Vale Castle is outside of the geographic scope of the HAA, through this Policy the draft LPB is seeking to preserve the cultural and historic setting of St Sampson by respecting the character of the existing Conservation Area and the historic setting of both harbours and their surroundings.</p> <p>The draft LPB does not propose or favour any specific strategic flood defence option for either HAA. Whilst the preparation of the LPB included updated assessment of flood risks to inform the draft policies, as the LPB sets the policy framework rather than identifying specific development proposals, it supports flood mitigation measures rather than proposing</p>

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						<p>specific flood defence options, although it would allow for such proposals to come forward. Policy 6.1 establishes criteria which requires proposed developments to include flood mitigation measures but it is outside of the scope of the LPB, as a strategic policy document, to identify specific coastal defences infrastructure to be delivered. The States has agreed that flood defence infrastructure will be provided at the Bridge to provide flood protection for existing properties and to support the development of sites for much needed housing. Any further future requirements for strategic flood defences will be considered separately by the States. The Development & Planning Authority notes the support for flood defences as set out in this Representation.</p> <p>Likewise, it is not within the scope of the draft LPB to propose or favour any option for future harbour development and it is not proposing any specific areas of land reclamation. In preparing the draft LPB, consideration was given to ensuring that the Policies and guidance within the LPB would be able to accommodate a decision of the States as to the future location of harbour infrastructure, regardless as to where that location may be. LPB Policy 1.2 seeks to protect the ability to deliver a future harbour for Guernsey, either by extending St Peter Port harbour or at Longue Hougue South, by identifying and protecting the land required for potential access routes to a future harbour and land required for the creation of the harbour or for future reclamation.</p> <p>The preparation of proposals for future harbour infrastructure is separate from the LPB and will require separate approval from the States Assembly. The draft LPB has been prepared in such a way to accommodate either of the most likely options for future harbour development based on the studies previously undertaken should the States decide to proceed.</p> <p>LPB Policy 1.3 relates to reducing the impact of the power station at St Sampson and LPB Policy 3.3 establishes the Marine Industries, Energy and Industrial Use Zone at Longue Hougue. These Policies would facilitate the relocation of parts of the existing power station to Longue Hougue if a sufficient case for relocation can be made by the appropriate party.</p>

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						It should be noted that the draft LPB is designed to set out a general planning policy framework and is not intended to identify precise projects to be delivered within that framework. It will be for developers to prepare proposals that align with the framework set in the draft LPB which will be considered by the Development & Planning Authority as per the normal planning application process.
E&I-20241014	N/A	N/A	Committee for the Environment and Infrastructure	10/14/2024	https://gov.gg/C/HttpHandler.ashx?id=183519&p=0	<p>LPB Policy 1.3 supports and encourages development which would lead to the relocation and/or replacement of the Power Station in St Sampsons. Whilst the long-term nature of such a relocation is noted, the intention of this Policy is to provide sufficient flexibility to accommodate the potential for relocation of some of all Power Station operations, either due to the age of infrastructure, requirement for security of power generation, complexity of relocation, as a result of implementation of further measures towards achieving Net Zero or through changes to Guernsey Electricity's own business model. It is noted that there may be potential for power generation to be split across two sites in the future, with some operations remaining in the existing St Sampson location and others relocating elsewhere. The draft LPB is supportive in principle of such a development. The Development & Planning Authority is supportive of amending the draft LPB to clarify that the power station currently uses heavy fuel oil and diesel and not gas.</p> <p>LPB Policy 1.4 supports development which relocates fuel storage, and as a result the associated Major Hazards Public Safety Zones, away from St Sampson harbour in order to facilitate residential and mixed-use development. However, it is accepted that this relocation should not negatively impact the Island's energy resilience. The Development & Planning Authority is supportive of additional detail being provided to LPB Policy 1.4 to reference the requirement for development to maintain and/or enhance the Island's energy resilience as part of any proposals to relocate fuel storage in St Sampson.</p> <p>Preparation of the draft LPB has taken into account, and where possible aligned with and supported, the potential for significant housing developments in close proximity to the St Sampson HAA and makes policy provision for housing development within the HAAs themselves. The</p>

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						<p>gateway policies in the LPB will act as a catalyst and allow development to come forward in the HAAs which supports the existing and future residential population in and around these areas.</p> <p>LPB Policies 3.1, 3.2 and 3.3 propose that development within the HAAs creates areas with coherent and diverse uses which will be complimentary of surrounding activities, will provide facilities and uses for the benefit of the wider community and will avoid the creation of areas with single or minimal uses which are only in use at certain times of the day. Whilst the draft LPB is a high- level policy framework so does not provide detail as to the specific type of housing development which might come forward within these areas (i.e. Affordable Housing and/or private market housing), the LPB would give policy support for the delivery of a range of housing mix, types and tenures and through the principle of encouraging diverse uses, is aligned with this Representation’s suggestion for the LPB to facilitate, where possible, the delivery of mixed tenure developments.</p> <p>The preparation of the draft LPB has considered how existing and potential future activities within the St Sampson HAA would best fit together in order to create areas with coordinated and clear uses which maximise the use of space. As shown in Proposals Map B, the creation of the Longue Hougue Marine Industry, Energy and Industrial Zone would enable industrial uses to be relocated away from the immediate harbour area in St Sampson, which in turn allows for the designation of a Mixed Use Regeneration Zone on Northside and The Bridge Core Mixed Use Zone.</p> <p>As set out in LPB Policy 3.3, the Bridge Core Mixed Use Zone will support the ongoing retail, restaurant, café and community focus of the Bridge, and the North of St Sampson Mixed Use Regeneration Zone will be capable of accommodating carefully designed and planned new uses such as housing, bars and restaurants and other activities that improve the enjoyment of the St Sampson harbour. In both cases, the intended outcome of establishing these zones is the creation of spaces which provide diversified employment opportunities and leisure uses for the benefit of the wider community which reinforce the Bridge as a Main Centre.</p>

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						<p>LPB Policy 5.1 will support development which improves facilities for active and sustainable travel, including (a) supporting a dedicated bus links and improved cycle link between the two HAAs, (b) encouraging and supporting the use of bicycles and E-bikes, and (c) enabling the delivery of mobility hubs. It is accepted that the specification of a dedicated bus link in this Policy may be overly restrictive and preclude other methods of mass public transport. The Development & Planning Authority is supportive of amending LPB Policy 5.1 accordingly.</p> <p>The Development & Planning Authority is supportive of also identifying a Sustainable and Active Transport Zone in the St Sampson HAA as referenced in this Representation. It is proposed that the Sustainable and Active Transport Zone in the St Sampson HAA would cover the majority of land directly adjacent to the inner harbour, broadly covering from the junction of New Road and South Quay on Southside, spanning the whole of the Bridge frontage and also covering the existing area of parking and public facilities outside the Guernsey Electricity premises on Northside. Furthermore, the Development & Planning Authority would be supportive of including the following additional detail in LPB Policy 5.1 regarding the Sustainable and Active Transport Zones to better explain the policy intentions:</p> <p>“Sustainable and Active Transport Zones are areas of focus for providing active travel infrastructure, including mobility hubs, cycle parking, and e-bike or e-mobility charging points. By focussing these zones in accessible locations close to the centres of the St Peter Port and St Sampson HAAs, this will encourage trips to be made by sustainable and active travel, and help to reduce vehicle congestion. Although the Sustainable and Active Transport Zones provide a focus for active travel infrastructure this does not prevent its inclusion as part of development proposals in other areas of the HAAs”</p> <p>Whilst the glossary of the draft LPB does identify that shared mobility could be incorporated into any development of a mobility hub, it is accepted that shared mobility and mobility hubs are not mutually inclusive</p>

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						<p>as referenced in this Representation. The Development & Planning Authority is supportive of including text in LPB Policy 5.1 to more generally support the consideration of shared mobility opportunities through development proposals.</p> <p>LPB Policy 5.2 supports development which will improve implementation of the road user hierarchy as set out in the On Island Integrated Transport Strategy. One specific measure identified in LPB Policy 5.2 is the relocating of through traffic from the Bridge in St Sampson across the harbour such that improvements can be made to support the environment around the Bridge and making it a better place to visit and spend time. It is noted that the existing inter-harbour route is of strategic importance and should be maintained. Whilst it was the intention that the requirements of the inter-harbour route would be maintained, the Development & Planning Authority is supportive of including additional detail in LPB Policy 5.2 (d) to specify that any alternative route across the St Sampson harbour must meet the requirements of the inter-harbour route.</p> <p>LPB Policy 5.3 will be supportive of development which will lead to a reduction in the visual impact of car parking in the HAAs. As an example, the development referenced in this Representation (decked parking on North Beach) would, in principle, be supported by LPB Policy 5.3. Whilst it is noted that there would need to be wider consideration of the impacts of such a development, the draft LPB has been prepared to consider the impacts of potential developments comprehensively, and as such in this example LPB Policies 5.1 and 5.2 would provide guidance which would support potential developers to identify the necessary solutions.</p> <p>LPB Policy 6.1 has been prepared to provide guidance to encourage consideration of flood mitigation measures in the absence of the development of a comprehensive strategic flood defence for the east coast. Depending on the vulnerability of use proposed, LPB Policy 6.1 establishes a need for appropriate flood protection to be incorporated into individual development proposals. The reference to failure in the Flood Vulnerability Classification table relates to the failure of the localised flood defence measures provided as part of any specific development, rather</p>

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						<p>than failure of wider, strategic flood defence infrastructure. The Development & Planning Authority is supportive of amending the wording within the Flood Vulnerability Classification table to make clear that the requirement is for mitigation measures (i.e. evacuation plans) to be in place to deal with the risk of failure or overtopping of the flood protection provided as part of any specific development.</p> <p>The supporting text in LPB Policy 6.2 establishes that, alongside the direct environmental benefits achieved through decarbonisation, supporting development which considers methods to achieve decarbonisation may also achieve wider benefits through facilitating or providing synergies with other strategic developments, including the potential relocation of power generation, provision of flood mitigation measures, and the relocation of fuel storage to reduce the spatial impact of the Major Hazards Public Safety Zones.</p> <p>Whilst LPB Policy 6.3 specifically supports development which increases greening and biodiversity through the provision of additional trees, planting and other biodiversity measures, it is noted that such nature-based solutions can not only support biodiversity but can also help alleviate surface water flooding and decarbonisation. As such, the Development & Planning Authority would support including in LPB Policy 6.2 reference to the provision of nature-based solutions in order to support decarbonisation and surface flooding.</p> <p>Whilst it is noted that this representation highlights a need for the draft LPB to provide flexibility with regard to species of planting to adapt to the impacts of climate change in the future, as the LPB will provide a Policy framework for 10 years, it is considered that the focus on supporting native species is proportionate.</p> <p>It should be noted that LPB Policy 6.3 applies to the whole of the HAAs and not solely the Green Zones identified in the Proposals Maps. For clarity, the Green Zones relate specifically to LPB Policy 3.3 and providing guidance to protect the character of these areas. The Development & Planning Authority is supportive of providing additional context in LPB</p>

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						<p>Policy 3.3 to provide guidance on how development can come forward within the Green Zones in order to protect the character of these areas.</p> <p>LPB Policy 6.3 supports development which will increase greening and biodiversity within the HAAs through the provision of additional trees, planting and other biodiversity measures proportionate to the location, scale and form of development proposed and in a way that increases the overall biodiversity and greenness of the HAAs over time. The supporting text to LPB Policy 6.3 establishes the opportunities for greening in the HAAs which may include biodiversity measures that are incorporated into any flood defence or changes to the harbours that can offer potential for an improved marine environment and related ecosystems.</p> <p>The Development & Planning Authority is supportive of including energy resilience as part of the key theme of resilience in the draft LPB, which is in line with the proposed amendment to LPB Policy 1.4 as set out in this response.</p> <p>Within the summary of analysis for the St Sampson section of the draft LPB, it is stated that decarbonisation of the grid could also reduce demand as more energy is made in renewable ways on the island. It should be noted that the assumption that demand could reduce does not influence the guidance provided in LPB Policy 1.4.</p> <p>The Development & Planning Authority notes the inaccuracy in Section 2.3.5 of the draft LPB and agrees that there is an Area of Biodiversity Importance (ABI) in the St Peter Port HAA at Havelet. It is supportive of amending the draft LPB to accurately reflect the location of this ABI. The representation notes the close proximity of a Site of Special Significance to the St Peter Port HAA. However, this falls outside of the HAA extent and the Development & Planning Authority considers that existing IDP Policy GP2: Sites of Special Significance, which will remain relevant provides sufficient policy consideration and so the SSS does not need to be highlighted in the LPB.</p> <p>The Development & Planning Authority notes the comments in the</p>

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						representation that there is inaccuracy regarding the wording of Environmental Impact Assessments in Section 3.7. The DPA does not consider that this section is inaccurate as it clearly sets out that the EIA screening was in relation to policies and the conclusion was that “LPB policies will not themselves give rise to EIA development”. However for clarity it supports adding wording to make clear that this does not negate the need for project level EIAs or screening as per the IDP.
LO Architects-20241014	N/A	N/A	Lovell Ozanne Architects	10/14/2024	https://gov.gg/CHttpHandler.ashx?id=183521&p=0	<p>The proposed Policies in the draft Local Planning Brief (LPB) for the St Peter Port and St Sampson Harbour Action Areas (HAAs), have been drafted in order to be consistent with the purposes of The Land Planning and Development (Guernsey) Law, 2005 and with the strategic objectives of the States of Guernsey as set out in Strategic Land Use Plan (SLUP) which are, in turn, reflected in the policies of the Island Development Plan (IDP).</p> <p>Resilience is emphasised as a core positive theme of the LPB, as set out in section 1.6, acknowledging that the Island must be able to meet the challenge of adapting to changing circumstances, including climate change and border controls, to meet its future needs. This theme runs throughout the document and is reiterated in the opening paragraph of section 7.1 which ties back to the Overall Vision and Objectives of section 6. In response to the representation from the Committee for the Environment & Infrastructure the Development & Planning Authority supports the inclusion of energy resilience in the core resilience theme.</p> <p>Viability It is a function of the planning system to ensure that competing considerations and demands are appropriately balanced in reaching decisions on proposals for development. This includes balancing of the influences on design of proposals resulting from viability requirements with the impact of those proposals on the historic environment and townscape of both St Peter Port and St Sampson’s. Section 1.2 of the LPB makes clear that the LPB will not conflict with or change the policies of the IDP. It sets out more specific requirements for the HAAs than is included within the IDP, building on further technical evidence and consultation, and once approved by the States, will be part of that document. Policy</p>

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						<p>MC10 of the IDP and paragraph 9.2.12 which forms part of that policy, state that proposals for development or redevelopment within the HAAs will be supported where they are in accordance with the Principal Aim of the IDP and the LPB for the area and are consistent with the IDPs objectives. Therefore, there is a general presumption in favour of development if these requirements are met. Individual proposals will still have to be judged against the material planning considerations and any other requirements of the Planning Law.</p> <p>Support of the vitality and vibrancy of the HAAs, Main Centres and wider Island is a theme which runs throughout the LPB. Where mention is made of financial contributions to strategic infrastructure this is set out clearly as a potential and not as a firm requirement so that there is flexibility to consider this on a case by case basis which can take into account the type, scale and particular circumstances of development that might be under consideration.</p> <p>Taking flood defences as an example, LPB Policy 6.1 establishes that development may deliver its own proposals or may be required to make financial contributions via a planning covenant to a wider solution when a strategic solution is in place. It should be noted that the draft LPB does not require all proposals for development to make financial contributions towards the delivery of strategic infrastructure but allows it as an option. The guidance in LPB Policy 6.1 provides flexibility to consider such financial contributions on a case by case basis, and will support and enable comprehensive and effective delivery of strategic flood defence in the future.</p> <p>The draft LPB is intended to set high level enabling policy and allows for a wide range and type of uses so that the viability of any particular use or combination of uses can be addressed through development proposals. In considering development proposals on a case-by-case basis, if economic viability is a material planning consideration, the Development & Planning Authority will take it into account and will, if necessary, assess economic viability using recognised financial viability models and may consult independent viability assessors as part of the assessment process,</p>

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						<p>particularly where there is dispute over viability issues. This approach is in line with the guidance in certain IDP Policies.</p> <p>Approach to Parking Provision within the HAAs The proposed Policies in the draft LPB have been drafted in order to be consistent with the strategic objectives of the States of Guernsey as set out in the On-Island Integrated Transport Strategy (ITS). At the same time the draft LPB recognises the critical role that the volume and availability of car parking can have in supporting St Peter Port and St Sampson as the islands primary business centres and as main centres generally.</p> <p>Whilst LPB Policy 5.3 seeks to reduce the visual impact of car parking on the harbours and to maximise the potential of key sites for economic, social and environmental uses through reconfiguration and rationalisation of parking, it does not seek a reduction in the volume of parking in these areas and is neutral regarding increase in parking. The supporting text to this Policy explains that a change in the balance of parking use with a reduction in long term car parking in the HAAs might facilitate a fairer balance of space for all sectors and users requiring parking but recognises that this issue will require a reviewed approach to parking access and use which needs to be considered in the round as there are a number of important considerations, one of which will be impact on all users and businesses. This falls outside of the remit of the LPB.</p> <p>LPB Policy 3.2 seeks to achieve more efficient land uses in the HAAs, which may include consolidated and optimised car parking in the St Peter Port HAA such that it better supports the shops and businesses in Town. The intention of the draft LPB is to encourage proposals for development to explore how to improve parking provision in the HAAs by balancing reduction in the visual and spatial impact of car parking and retaining or improving individuals' ability to access these areas.</p> <p>In conjunction with LPB Policies 3.2 and 5.3, IDP Policy IP8 – referenced in the draft LPB – notes that net increase in car parking may be acceptable where major development of a site is proposed. This may result in temporary increases in parking whilst developments are being</p>

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						<p>constructed. Although this is not explicitly stated in the draft LPB, it is allowed for within existing IDP policy which will apply to development proposals and it is anticipated to be an unlikely scenario and temporary in nature, ultimately resulting in maintaining the status quo through increased parking in some areas compensating for removal of parking elsewhere. Relevant policies of both documents would be used in determining the appropriateness of such an eventuality, based on the visual and other impacts of reconfigured and rationalised car parking and the efficient use of land within the relevant HAA.</p> <p>Buildings of Scale LPB Policy 4.2 specifies that development in the HAAs must respect the heritage and setting of the harbours as well as their design quality by responding positively to the strong character of the harbours through considered selection of materials and good design as well as appropriate built form and character. Whilst LPB Policy 4.2 does state that key public or arts uses may be proposed as landmark buildings of the highest quality architecture and design, it is not the intention of the draft LPB to restrict the use of landmark buildings to solely public or arts uses. However, it is acknowledged that the proposed policy could be interpreted in that way. To clarify the intention of the LPB the Development & Planning Authority is supportive of amending LPB Policy 4.2 (b) to:</p> <p>Responding positively to the strong character of the harbours through considered selection of materials and good design as well as appropriate built form and character. This does not mean that all new development should necessarily look like the historic buildings in the HAAs and adjacent areas of Town, but that it should be of the highest design quality as appropriate for the proposed use and location and with a clear design response to the context. Developments of substantial scale and landmark buildings throughout the HAAs should also be of exceptional design quality. Within the Landmark Opportunity Zones in Proposals Map A, such developments will also be expected to provide appropriate and active uses at ground floor which support public access and uses such as arts and/or cultural uses.</p>

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						<p>It should be noted that the draft LPB has been drafted to compliment and, where necessary, provide additional detail on the existing Policies of the Island Development Plan (IDP) which will still apply to development proposals. The guidance and support in LPB Policy 4.2 is aligned with IDP Policy GP8, which specifies that development proposals should consider multi storey design from the outset unless there are overriding reasons why this approach would be unacceptable in the particular location, and that the provision of taller buildings is supported, including those that are significantly higher than their surroundings, in appropriate locations where this would make a positive contribution to the urban townscape and would not have an adverse impact on an important view of a landmark, building or monument. As a result, LPB Policy 4.2 does not impose any additional restrictions with regards to the height or scale of development and reinforces the importance of considering the height of development in terms of impact on views and heritage.</p> <p>Allow for permanent development to be carried out in advance of decisions on strategic flood defences.</p> <p>A primary aim of the LPB is to encourage investment and development over the coming years within the HAAs. Much of this investment will enable the States to deliver essential long term flood mitigation which will have a symbiotic relationship with new development as well as ensuring current land uses in the HAAs can continue to function. In setting out how diversification of the waterfronts can enhance the HAAs and the role of flood defences in ensuring this can happen, LPB Policy 3.1 refers to LPB Policy 6.1 and makes a distinction between differences in use and permanence of those uses.</p> <p>LPB Policy 6.1 establishes that development may deliver its own flood defence proposals that provide an appropriate level of protection from flooding and mitigation measures, to ensure the safety of residents, occupants, workers and all users or may be required to make financial contributions via a planning covenant to a wider solution when a strategic solution is in place. Developers must consult with the DPA when developing flood risk mitigation measures to ensure that they are aligned with a holistic approach to flood risk mitigation. The whole leads towards</p>

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						<p>the holistic approach set out as being required in the second paragraph of LPB Policy 6.1.</p> <p>Whilst LPB policy 3.1 does make clear that some uses may represent the kind of long term uses needed in the HAAs and because of their flood resilience can come forward from day one, it is accepted that this policy does not make clear that the LPB intention, as expressed in Policy 6.1, is that development for some more vulnerable uses may be acceptable before long term strategic flood defences are in place providing that they are designed to include permanent flood defence measures which must not increase the flood risk to surrounding uses or the wider HAA or beyond. The Development & Planning Authority would support the rewording of Policy 3.1 to clarify this.</p> <p>It should be noted that the draft LPB is supportive of the enabling flood defence already agreed by the States along the Bridge frontage, which will mitigate flood risk and allow important development to come forward in advance of a decision on strategic flood defences.</p> <p>No need for Development Frameworks As acknowledged in the representation, the LPB will not conflict with or change the policies of the IDP. It sets out more specific requirements for the HAAs than is included within the IDP, building on further technical evidence and consultation and, once approved by the States, will be part of that document. It will become a formal amendment to the IDP and will be a material consideration in making planning decisions. Relevant IDP policies and guidance must still be adhered to.</p> <p>The LPB allows for a co-ordinated approach to development in the HAAs as required by the IDP. IDP Policy MC10 specifically says that development of the HAAs will be delivered through a LPB. As the LPB will provide development guidance there will not be a requirement for separate Development Frameworks for development in these areas. The Development & Planning Authority supports clarification of this point in section 1.2.</p>

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STPP Constables-20241016	N/A	N/A	St Peter Port Constables	10/16/2024	https://gov.gg/CHttpHandler.ashx?id=183522&p=0	<p>It is noted that this Representation appears to be a duplication of a previous Representation provided by the St Peter Port Douzaine and as such the response is the same for both.</p> <p>The draft Local Planning Brief (LPB) for the St Peter Port and St Sampson Harbour Action Areas (HAAs) has been drafted to provide a strategic policy framework for the HAAs, setting at a high level the themes of development which will be encouraged and supported for these areas and establishing a number of core themes and gateway Policies. These will provide guidance to potential developers and will allow development to come forward which is coordinated and comprehensive.</p> <p>It should be noted that, as such, the draft LPB does not propose or support any particular option for the development of future commercial port infrastructure. In preparing the draft LPB, consideration was given to ensuring that the Policies and guidance within the LPB would be able to accommodate a decision of the States as to the future location of harbour infrastructure, regardless as to where that location may be. LPB Policy 1.2 seeks to protect the ability to deliver a future harbour for Guernsey, either by extending St Peter Port harbour or at Longue Hougue South, by identifying and protecting the land required for potential access routes to a future harbour and land required for the creation of the harbour or for future reclamation.</p> <p>The need to protect the heritage, culture and character of the HAAs was highlighted during consultation undertaken as part of the preparation of the draft LPB. As a result, culture, heritage, tourism and leisure was included as one of six key themes underpinning the draft LPB. LPB Policy 4.2 specifies that development proposals on any part of the HAAs must respect the heritage and setting of the harbours as well as their design quality, through (a) improving how the various heritage assets within and around the HAAs are celebrated and to expand opportunities to do so, (b) responding positively to the strong character of the harbours through considered selection of materials and good design as well as appropriate build form and character, and (c) careful consideration of key views within the HAAs and connections across the water, out to sea, and between</p>

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						<p>different areas. LPB Policy 4.2 aims to secure that the heritage and character of the HAAs is not overlooked or poorly considered in development proposals.</p> <p>LPB Policies 5.1, 5.2 and 5.3 will all support development which improves transport choice and encourages active and sustainable transport methods, which could reduce the impact of car parking on the piers in St Peter Port. LPB Policy 5.1 supports development which will improve facilities for active and sustainable travel, including (a) supporting a dedicated bus link and improved cycle link between the two HAAs, (b) encouraging the use of bicycles and E-bikes, and (c) enabling the delivery of mobility hubs in both HAAs in order to provide improved options for transport choice. LPB Policy 5.2 further seeks to encourage active and sustainable travel by supporting development which will improve implementation of the islands Road User Hierarchy, which will include (a) improving the quality and ease of connections for pedestrians within the HAAs, (b) implementing improved routes for pedestrians and cyclists to ensure a more equitable distribution of road space, (c) more frequently give over space on the Esplanades to people, on a temporary or permanent basis, and (d) relocating through traffic from the Bridge across the harbour so that improvements can be made to support the environment around the Bridge. LPB Policy 5.3 supports development which will lead to a reduction in the visual impact of car parking on the harbours, primarily in St Peter Port, through changes in management arrangements, improved signage and better travel choice.</p> <p>In preparing the draft LPB, engagement was undertaken with Guernsey Ports to ensure that, where possible and appropriate, the Policies proposed in the draft LPB are supportive in principle of the potential Pool Marina development. LPB Policy 2.2 'Supporting the marine leisure industry' identifies that a key function of the HAAs is to allow people to get onto and into the water in a range of ways such as facilities for water sports, water-based training, and for boat owners and boat trips. LPB Policy 2.2 specifies that proposals will be supported where they support the provision of additional marine leisure facilities and services, including a potential Pool Marina, new facilities for visiting yachts, and other spaces</p>

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						<p>that support the marine leisure industry.</p> <p>With regards to the provision of green space, LPB Policy 6.3 will support developments which aim to increase greening and biodiversity within the HAAs through the provision of additional trees, planting and other biodiversity measures. This includes the protection or replacement of existing trees and green areas and a net increase of greening and/or tree planting and biodiversity as part of any proposals in a way that is proportionate to its scale and location.</p> <p>As an intentionally high level strategic policy document, the LPB does not specify the order in which development will come forward and cannot guarantee that specific development will come forward at all, but, by providing the gateway policy framework, it aims to support, encourage and facilitate appropriate development. Subject to approval from the States, the draft LPB will become an addition to the Island Development Plan and will provide guidance and support to potential developers as to how to bring forward development in a coordinated and comprehensive manner. Throughout the preparation of the draft LPB, the Development & Planning Authority has engaged closely with the Guernsey Development Agency, as well as other potential developers and land owners, to make sure that the themes of development identified in the draft LPB are feasible and deliverable.</p> <p>Whilst the draft LPB does not identify specific developments to be delivered, the proposed developments referenced in this Representation would, in principle, be supported by the draft LPB. LPB Policy 1.1 provides guidance to ensure that the necessary land to maintain the operational requirements of the port in its current location in St Peter Port is protected. LPB Policy 1.1 establishes a Secure Port Area Consultation Zone and a Port Growth Consultation Zone, which will allow room for necessary port operations and infrastructure which will support Guernsey Ports to continue to maintain and enhance its operational activities now and in the future.</p>

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HA-20241017	N/A	N/A	Committee for Home Affairs	10/17/2024	https://gov.gg/C/HttpHandler.ashx?id=183524&p=0	<p>As referenced in this Representation, the draft Local Planning Brief (LPB) for the St Peter Port and St Sampson Harbour Action Areas (HAAs) has been prepared as a strategic policy document, setting at a high level the themes of development which will be encouraged and supported for these areas and establishing a number of core themes and gateway Policies. These will provide guidance to potential developers and allow development to come forward which is coordinated and comprehensive.</p> <p>The Representation references concern that harbour security and maintaining the integrity of the ports infrastructure was not included as a key development objective. However, it should be noted that, in order to support alignment between the guidance within the draft LPB and the work of the Guernsey Development Agency, the development objectives for the draft LPB intentionally matched those which were set by the States of Deliberation in July 2023 (Billet d'État X).</p> <p>Whilst the concerns of the Committee for Home Affairs are noted, the Development & Planning Authority is confident that the Policies proposed in the draft LPB, which are the core element of the document which will guide and influence development, are proportionate in balancing the need to protect the statutory activities referenced in this Representation with the need for encouraging investment in appropriate locations within the HAAs.</p> <p>In preparing the draft LPB, the importance of enabling resilience of harbour operations, which includes the statutory requirements referenced in this Representation, was identified as one of six core themes which would underpin the Policies proposed in the draft LPB. This directly informed the preparation of LPB Policy 1.1, which, in recognition of the critical role of the harbours, establishes the Secure Port Area Consultation Zone and the Port Growth Consultation Zone and sets a requirement for the Development & Planning Authority to consult with the Guernsey Border Agency regarding any proposed development within these areas.</p> <p>The Development & Planning Authority is supportive of amending the draft LPB to make clear that references to harbour operations refer to</p>

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						<p>both commercial port activities as well as the statutory security and customs activities as set out in this Representation.</p> <p>It is a function of the planning system to ensure that competing considerations and demands are appropriately balanced in reaching decisions on proposals for development. This includes balancing of the detail of development proposals with other material planning considerations and impacts such as those on statutory requirements and activities. The policies of the IDP and material considerations of the Planning Law will be used in balancing this assessment. With regards to proposed development outside of the Secure Port Area Consultation Zone and the Port Growth Consultation Zone the Development & Planning Authority will also consult with the relevant authorities and stakeholders, including the Committee for Home Affairs, on a case by case basis depending on the nature and location of the development being proposed.</p> <p>As part of the preparation of a LPB, the Development & Planning Authority has a statutory requirement to notify any Committee of the States whose area of responsibility may be affected by the proposals of (a) the intention to prepare a draft LPB, and (b) the main issues considered relevant to such proposals within the draft LPB prior to publication. The Development & Planning Authority wrote to the Committee for Home Affairs in August 2023 to notify of the intention to prepare a draft LPB, to advise that the draft LPB will be prepared in line with the development objectives set by the States, and to request any relevant information or comments be provided. Furthermore, in March 2024, the Development & Planning Authority wrote to the Committee for Home Affairs to advise of a consultation focussing on the main issues and considerations identified during the initial information gathering stages of the LPB preparation process and to request any comments or feedback on this matter.</p>