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ANON-ACRH-DBR7-D	Dawn	Pooley		8/10/2024	<p>I would like to understand if the option of building a cill across the harbour at St Sampsons has been considered or costed? I will request this as a Freedom of Information Act request if necessary. This would create the commercial wharfage required and more marina capacity. Having worked in the marina industry for many years I can tell you that the £100m budget for building a marina in the pool will be wildly insufficient and the EBITDA will not justify the expenditure.</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>As such, the draft LPB, intentionally, does not identify specific projects to be delivered, such as the development of a cill across the harbour at St Sampson, as proposed in this Representation, but does put in place the policy framework which would allow such development proposals to be considered. However, the development of a cill, lock, water gates or appropriate flood mitigation across the harbour at St Sampson would in principle align with two of the core themes of the draft LPB; (a) Supporting the marine sector to provide job and leisure opportunities, and (b) new and expanded uses and activities within the HAAs.</p>

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						<p>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, 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. Furthermore, LPB Policy 2.3 ‘Retaining and enhancing the diversity of the HAAs’ states that proposals that retain, expand or further diversify the range of smaller scale marine and water related uses in the HAAs will be supported.</p> <p>Whilst the delivery of development of a cill across the harbour at St Sampson is outside of the remit of the draft LPB, it would provide the policy framework to allow such proposals to be considered and would support them in principle should such proposals come forward as long as they align with the other Policies proposed in the draft LPB, and other States strategies and policies.</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</p>

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						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.
ANON-ACRH-DBRG-W	Mark	Jeffreys		8/10/2024	<p>The action area plan is well considered and covers the key points for consideration for developing each area.</p> <ul style="list-style-type: none"> - The challenge now for the States is to be bold and implement some of the changes that are suggested in the plan. - Low cost but high impact changes should be considered first. It would be very simple to redirect traffic from the bridge area and remove parking from the area in front of the shops. This could be implemented simply by putting a barrier in front of the area, then putting in some temporary seating to encourage people into the area. If there were then challenges to traffic or if certain groups were not able to access the area then this could be identified before any large scale change is made. This would also be applicable to the area from the roundabout to the bottom of the Val des Terres. The entire road could be made only for cyclists and buses with 	<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). The proposed LPB Policies will further enable the delivery of infrastructure in order to achieve said strategic objectives.</p> <p>The proposed Policies in the draft LPB are broadly supportive of the types of low cost/high impact developments identified in this Representation. However, the draft LPB intentionally does not detail specific developments which should come forward for specific sites within the HAAs. Instead, the draft LPB is a strategic policy document, establishing a high-level policy framework which will provide the gateway policies and guidance to allow development proposals to come forward in a coordinated manner. Subject to approval from</p>

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					<p>the parking on the piers removed. Any challenges or opposition that was identified with this stage could again be addressed prior to a more large scale change being made.</p> <p>- Paid parking should be introduced, and if the parking at the Crown and Albert piers is to be retained this should be at an increased rate to the North Beach area. There are solutions that involve the use of apps that would not require infrastructure such as payment machines to be installed. The report correctly identifies that car use will remain in high demand whilst there is free unlimited parking available. Of course residents will be opposed to paying for parking, but it would be beneficial to everyone if it was introduced as it would encourage people to use other transport methods. The charges for parking should be such that using the bus is cheaper than using a car. As an example of where using a car is almost encouraged, my wife and I recently went for a meal with friends in town. As the weather was poor we took the bus rather than cycling or driving. In total to get to town and back on the bus we</p>	<p>the States, the LPB will become an addition to the Island Development Plan, providing a strategic policy framework and guidance within which specific proposals for developments can come forward.</p> <p>Delivery of specific developments is outside of the remit of the draft LPB but, following States approval, it will provide the policy gateways which will allow proposals to be brought forward by landowners and developers. The Development & Planning Authority will continue to work closely with the Guernsey Development Agency and other landowners and prospective developers in order to encourage inward investment and to provide guidance in order to support delivery of development which is comprehensive, coordinated and maximises benefit to the wider community.</p> <p>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</p>

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					<p>paid £12 (£2 inbound, £10 outbound on the night bus). In contrast our friends were able to park for free, and had the additional convenience of arriving and leaving at the time of their choosing. Until it is a preferable option to use the bus in terms of cost and convenience, the majority will continue to drive.</p> <p>- The report notes that 77% of people are within a 5 minute walk of a bus stop. This is of course a positive, however the challenge is that a larger proportion of the population is within 1 minute walk of a private car. Furthermore, when advertising this consideration needs to be given to the quality of the bus stops. A number of the bus stops are no more than the word "Bus" written on a thin pavement or road, which do not provide cover or space for a number of individuals to wait. Without significant investment this could not be changed, but my key point is that the statistic quoted cannot be used in isolation to promote bus usage.</p> <p>- It is very exciting that large scale changes could significantly improve the usage of the harbour action areas. Imagining that the instead of carparks there could</p>	<p>further seeks to encourage active and sustainable travel by supporting development which will improve implementation of the 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.</p> <p>A core theme of the draft LPB is recognising the importance of climate resilience and the natural environment. LPB Policy 6.3 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.</p>

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					<p>be green space in town for individuals to enjoy the beautiful Island that we live on is very positive. I reiterate that firstly low cost high impact changes should be implemented first. It would be great if changes could be made within a period of months or a couple of years. I hope that we do not have to wait decades for changes to be made.</p> <p>- It is only by making decisions to make car usage less convenient, by way of redirecting traffic, limiting parking, and introducing paid parking that there is going to be any change away from people using private cars. The States needs to be prepared that these decisions will be met with resistance, but keep in mind the long term aims of making the harbour action areas, and island more broadly, more attractive.</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>
ANON-ACRH-DBRM-3	Sarita	Keen		8/10/2024	<p>The environmental impact of this planning option would be catastrophic due to the redirection of our exceptionally strong tides. When QE2 was built the resulting tidal redirection has meant that a significant amount of the northern end of Herm and the Humps has been washed away, so this plan could potentially wash away an even</p>	<p>It is not clear what specific planning option or draft Local Planning Brief policy is being referred to in this Representation. For the purposes of clarification, the draft proposals do not relate to any potential new harbour or land reclamation areas which fall outside of the remit of the Local Planning Brief (LPB). Whilst the LPB makes provision within its area for the potential infrastructure required should a new harbour be proposed, such proposals are a</p>

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					larger portion of Herm and it's surrounding waters.	<p>separate matter which will be considered by the States at the appropriate time having been through the necessary processes, including necessary reports and studies. The Policies proposed in the draft LPB for the St Peter Port and St Sampson Harbour Action Areas (HAAs) do not directly propose or make provision for a new harbour or land reclamation along the east coast.</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>
ANON-ACRH-DBR1-7	Tom	Moore	St Peter Port Douzaine	10/13/2024	<p>firstly I think we cannot really move forward until a new harbour site is chosen. On balance I would prefer development of the east arm of St Peter Port to Longue Hougue for tidal and environmental reasons and maintaining vitality for the town.</p> <p>I support enhancing the culture and leisure and arts of town with</p>	<p>It is noted that this Representation appears to be a duplication of a previous Representation provided by the St Peter Port Constables 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,</p>

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					<p>new theatre cinema music possibilities and excellent restaurants and using part of the piers for events happenings and public art .</p> <p>I support underground parking at north beach and possibly at the south esplanade and multi storey car parks elsewhere .</p> <p>I am wary of creating a transport bus hub at the north beach as this is. Bleak area at winter and would cut off the south of town for commuters, locals, shoppers tourists and disabled people. Think about pedestrians bus users and others who actually need the services as well as old quarter residents . The quay bus stops are very well used throughout the year .</p> <p>We need more housing in town and I think North Beach is a possibility The town and St Sampsons should be enhanced and redesigned to encourage public transport use and active travel . The main quay road should be narrowed with cafe restaurants pavements style encouraged.</p> <p>A pool marina , more space for both local and high net worth boats and a blue leisure economy</p>	<p>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 Hogue 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</p>

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					<p>must be encouraged. If the bus station terminal stays where it is , my preference it should be landscaped and reduced in size with less space perhaps for spare buses to park .</p> <p>We need a permanent street market and charming quays like we see in say Roscoff and Bristol etc.</p> <p>The Victor Hugo centre should be an amazing draw. Sports too could be useful and space for therapy pets too.</p> <p>I support a new Bridge for St Sampsons removing industrial and unloading areas eastward and concentrating the existing Bridge and Southside Northside areas as leisure residential cafe areas with new developments of housing with sea views both part ownership and social housing and private executive aspirational housing . We need to make the Bridge an upmarket desirable area and improve hospitality and leisure and retail facilities with new offices too.</p> <p>Community hubs as part of a partnership of purpose for health and wellness would fit well on the Bridge and in town too. A</p>	<p>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 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</p>

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					<p>long awaited library and restoration of a cinema theatre would be good too as well as enhancing the area around the Clock tower the ancient church and the Vale Castle opposite , the Development Agency have some useful ideas here too and I would support artistic innovations and creative architecture with mandatory public art .</p> <p>More bus services a transport hub better cycle facilities and maybe a light railway tramway would be powerful resources as would more green areas parks and water parks too .</p> <p>We need creative investment. Big boats and fuel need to be moved further east . I would support a cruise liner pier .</p>	<p>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,</p>

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						<p>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 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</p>

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						<p>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</p>

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						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.
ANON-ACRH-DBRA-Q	Tania	Sargent	Guernsey Water	10/11/2024	<p>St Peter Port and St Sampson HAA - Guernsey Water Initial Representation</p> <p>Guernsey Water supports the development of a Local Planning Brief (The Brief) for the St Peter Port and St Sampson Harbour Action Areas (HAA). Both areas contain substantial water and wastewater infrastructure that is critical for public health and protection of the environment. This makes it essential for Guernsey Water to be consulted as early as possible during the preparation of planning policy or any proposals for new development in these areas.</p> <p>Flood Risk</p> <p>Due to the island's topography, St Peter Port receives</p>	<p>The draft Local Planning Brief (LPB) for the St Peter Port and St Sampson Harbour Action Areas (HAAs) has been drafted to compliment and, where necessary, provide additional detail on the existing Policies established within the Island Development Plan (IDP). The supporting text to IDP Policy GP9 sets out that drainage solutions will need to form part of development proposals and should address and, where necessary mitigate any unacceptable increase in flood risk as a result of the development proposed. Furthermore, IDP Policy GP9 states that consideration should be given to incorporating sustainable drainage measures as part of the development process. The Development & Planning Authority are supportive of including the following additional wording in</p>

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					<p>wastewater flows from parts of St Martin and St Andrew, so it has a significant contributory catchment. Most parts of St Peter Port have a high proportion of impermeable hard surfaces, which means there is very little opportunity for rainfall to permeate into the ground. This means that the sewerage system in St Peter Port reacts very quickly to intense rainfall, which can cause loss of service, surface water and wastewater flooding for customers, particularly at low points such as basements. It also causes wastewater to discharge into the harbour and surrounding environment through several sewer overflows that are noted in Section 5.2 of Appendix 4.2 within The Brief; this causes a risk of pollution. Climate change is already causing more intense rainfall and over the long term this will increase the severity of these issues. Guernsey Water maintains a flood register which has recorded wastewater flooding at 140 properties in St Peter Port. These reports of flooding are backed up by hydraulic modelling. Areas at particular risk are located within the HAA between South Esplanade and</p>	<p>LPB Policy 6.3:</p> <p>“Opportunities for integrating green infrastructure should be maximised, with the introduction of sustainable urban drainage systems in line with best practice established by the SUDS Manual (CIRIA C753). This will also have the benefit of enhancing existing biodiversity and habitat creation, whilst also improving climate resilience and amenity co-benefits”.</p> <p>The purpose of the Proposals Maps is to identify areas where LPB Policies apply across the harbours, not to identify general planning designations (which must be considered through the general development management process). As a result, rather than identifying ‘Critical Drainage Areas’ on the Proposals Maps, the Development & Planning Authority are supportive of including additional wording to the supporting text of LPB Policy 6.1 to cover surface water flooding management.</p> <p>This Representation highlights specific issues around sewer outflows and pollution risks as a result of surface water flooding in the HAAs. Issues around surface water flooding can be successfully managed through the installation of</p>

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					<p>Salerie Corner. More are located between Salerie Corner and Longstore and whilst these aren't located within the HAA, they will be impacted by development within it. Therefore, under Policy 6.1 Guernsey Water asserts that the area between South Esplanade and Salerie Corner should be considered as an area with 'critical drainage problems' under policy 6.1.</p> <p>The critical drainage problems in this area have been largely caused by historic development and the 'creep' of impermeable hard surfaces within St Peter Port, and its contributory catchments over many years. The cost of upsizing the drainage infrastructure or providing an attenuation tank to deal with these problems is unaffordable and could cause unacceptable disruption within the HAA. The solution will require a mix of attenuation where cost effective opportunities arise, and the incremental application of retrofit sustainable drainage solutions (also known as SuDS) over many years.</p> <p>Policy 6.1 provides excellent coverage of flood protection. It also notes that "other sources of flooding, including surface water, sewers and groundwater</p>	<p>SuDS, which might include public realm works such as rain gardens or permeable paving. Generally, across the HAAs, as opportunities to remove hardstanding and replace this with green and blue infrastructure arise, these will be encouraged. The Development & Planning Authority are supportive of including the following additional wording into the supporting guidance to LPB Policy 6.1 to include reference to opportunities to better manage surface water flooding through new development:</p> <p>"Some areas within St PP harbour are affected by on-going critical drainage issues. This will be made worse with climate change as rainfall intensifies and sea levels increase. Guernsey Water maintains a flood register of properties that are at risk of sewer flooding. This register should be checked and, if necessary, complemented with an assessment of the effect of climate change on surface water flood risk in relation to a proposed development. For certain developments the Development & Planning Authority may require a drainage strategy to be developed as part of development proposals and will consult Guernsey Water to ensure that proposed developments are proportionately protected against</p>

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					<p>must be considered and mitigated as necessary". However, given the severity of the drainage problems and risk of pollution in St Peter Port and the HAA, Guernsey Water recommends that the latter be substantially strengthened.</p> <p>Redevelopment provides the best opportunity for going beyond mitigation and reducing of the risk of sewer flooding in St Peter Port. Guernsey Water has examples of working with developers to achieve 'betterment' like this, and would advocate inclusion of a policy that requires development in the HAA that has an impact on areas with critical drainage problems (inside or outside of the HAA), to work with stakeholders like Guernsey Water to identify opportunities for reducing drainage related flood risk and pollution risk from sewer overflows wherever possible.</p> <p>Sustainable drainage solutions also support policy 6.3 as they provide multiple benefits. In addition to reducing flood risk, they provide greening of open spaces and increase amenity value, they improve biodiversity and provide shelter and shading.</p>	<p>surface water flood risk for the current and future climates, and that it does not result in an increase of flood risk elsewhere. Opportunities for minimising hard surfaces and implementing sustainable urban drainage systems (SuDS) in line with best practice established by the SUDS Manual (CIRIA C753) should be maximised to reduce runoff at source, control pollution and enhance amenity and biodiversity".</p> <p>It should be noted that the Policies established in the draft LPB can only influence development within the geographic extent of the HAAs. Developments outside of the HAAs will be guided by the IDP, to which the draft LPB is aligned. Both the IDP and draft LPB provide a framework within which developers and the Development & Planning Authority will be able to make informed choices with regards to mitigating flood risk when considering development proposals.</p>

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					<p>All these benefits increase resilience to climate change.</p> <p>Sustainable drainage can also be incorporated into buildings in the form of green roofs, rainwater harvesting and rainwater planters for example.</p> <p>Guernsey Water worked closely with the Committee for Education Sport & Culture and Vauvert Primary school to prove the multiple benefits of some of these measures. Sustainable drainage is also supported by the Committee for the Environment & Infrastructure, which endorsed Guernsey Water's surface water management policy. More information can be found here: https://www.water.gg/SuDS</p> <p>Given the multiple benefits and the strong link with policy 6.1, Guernsey Water would advocate strengthening policy 6.3 by requiring all consequential development, as well as planting and greening of areas within the HAA to incorporate sustainable drainage measures wherever possible.</p> <p>Water Resources</p> <p>The latest update of Guernsey Water's Water Resources and Drought Management Plan has identified that if the island's population continues to grow as</p>	

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					<p>it is currently, a new water resource will be needed to provide long term water security. The island development plan contains policy that safeguards Les Vardes quarry for water storage. However, the future of the quarry is still to be debated by the States Assembly, which will also consider use of the quarry for inert waste disposal.</p> <p>An alternative to using Les Vardes for water storage is to develop a desalination plant. Viable locations for such a plant are extremely limited. One potential location is the Longue Hougue area in the St Sampson HAA. This provides access to deep fast flowing coastal waters, which are essential for the dilution of the concentrated brine waste that is produced by the desalination process. It is also well located for pumping treated water to Longue Hougue or Juas reservoirs, where it can be blended prior to water treatment.</p> <p>The desalination plant would also require a substantial power supply, so this location could compliment policy 1.3 regarding relocation of the power station as it may negate the need for major reinforcement of</p>	

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					<p>the local electricity distribution network.</p> <p>Guernsey Water welcomes the opportunity to provide this initial representation in response to the consultation on the Local Planning Brief for the St Peter Port and St Sampson HAA. Given the complexity of the critical drainage problems in St Peter Port, Guernsey Water would be pleased to meet with Development & Planning Authority representatives to discuss them in more detail.</p>	
ANON-ACRH-DBRS-9	Michael	Cunningham		10/11/2024	<p>This is an extremely expensive way of fixing something that isn't broken. Guernsey harbours serve the island's needs well as they are at present.</p> <p>Obviously, some expenditure is needed on on-going maintenance and improvements to safety and islanders' and visitors' experience of the area, but this is not the time for a costly wholesale overhaul. The States must prioritise its spending on what it can afford. The main issue that needs addressing regarding the harbours is providing more reliable and affordable air and sea links, not creating a white elephant area that no-one will use. It won't attract businesses or visitors and will</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 should be encouraged for these areas and establishing a number of Policies which provide guidance to potential developers and support for development that is aligned with the themes so that it comes forward in a coordinated and comprehensive way.</p> <p>The requirement for a strategy for the harbours was first identified in Policy LP8 of the Strategic Land Use Plan, which set out that the States will seek to investigate measures and support projects that enable</p>

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					<p>severely damage the character of the island.</p>	<p>Town and the Bridge to be maintained as attractive places to spend leisure time by developing a harbour strategy to balance competing uses. This was further supported through the Island Development Plan (IDP), which identified the HAAs as areas with significant potential to secure inward investment which will enhance and promote wider social, economic and environmental objectives.</p> <p>The IDP sets out the requirement to prepare a LPB for the HAAs in order to achieve a coordinated approach to the planning of mixed- use development and to look at opportunities beyond the purely functional requirements of the ports. In the absence of a LPB for the HAAs, IDP Policy MC10 stipulates that only developments of a minor or inconsequential nature, or developments which will not (a) prejudice the outcomes of the LPB process, or (b) inhibit the implementation of an approved LPB, will be supported. As a result, the draft LPB represents a significant step towards investment in our two main harbour areas by providing the gateway policies that will support proposals coming forward in a coordinated and comprehensive manner, which can encourage</p>

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						<p>inward investment into the economic, social and environmental potential of the HAAs.</p> <p>The reliability and affordability of air and sea links falls outside of the scope of this LPB however 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 sea connectivity now and in the future.</p> <p>It should be noted that the delivery of development in accordance with the draft LPB need not necessarily require public funding. In preparing the draft LPB, consultation was undertaken with potential developers, including the Guernsey Development Agency, in order to ensure that the draft LPB facilitates development which is achievable. It is not within the scope of the draft LPB to specify how development should come forward or who should be responsible for delivering development. However, the Policies</p>

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						<p>proposed in the draft LPB have been prepared to encourage and facilitate private investment into the HAAs.</p> <p>The draft LPB provides a Policy framework which will facilitate the necessary maintenance of infrastructure in order to support, and enhance, the attractiveness of the HAAs to Islanders and visitors alike.</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</p>

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						water, out to sea, and between 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.
ANON-ACRH-DBRU-B	Joanna	Watts	Watts Property Consultants Limited	10/11/2024	<p>1 GENERAL SUPPORT</p> <p>I am encouraged to see the very positive scope and ambition of the draft Local Planning Brief and the manner in which it sets out the vision for HAAs moving forward.</p> <p>I applaud the overarching intention of supporting and encouraging investment to allow a broad variety and scale of different economic, social and community uses, whilst also looking to sustain and enhance the character and quality of the St Peter Port and St Sampson Harbours moving forward.</p> <p>Acknowledging the LPB can support and assist in delivering increased resilience to a range of current and future challenges is also encouraging.</p> <p>Particularly as it recognises this can be undertaken in conjunction with large scale investment and new development. I wholly support the acknowledgement that this will be required to ensure viability and to achieve resilience, particularly in terms of</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. The Development & Planning Authority notes the general support for the draft LPB as referenced in this Representation.</p> <p>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</p>

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					<p>encouraging investment in strategic infrastructure. I also support that this is a key conclusion that needs to be reiterated throughout the LPB policies. This will ensure the policies are interpreted and applied positively, rather than negatively. Ensuring a presumption in favour of new development within the LPB policies from the outset will provide certainty and confidence to the wider community. It will also make it more likely that development proposals and related investment will be brought forward, especially where they involve those relating to much needed strategic infrastructure.</p> <p>The need for the LPB to be flexible whilst also providing clear guidance and policy tools is also critical as it will ensure it can apply to different circumstances that may arise over time .</p> <p>2 VIABILITY</p> <p>Key to the success of unlocking the potential of the HAAs is the need for the policies to acknowledge and consider financial viability when determining future planning applications. Without this it will be difficult to</p>	<p>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</p>

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					<p>deliver investment in the variety and scale of different economic, social and community uses which are envisaged. Even more so, given the contributions they might make to the strategic infrastructure envisaged by the draft LPB.</p> <p>At a time of continued high inflation, high interest rates and increasing build costs, the viability challenge is more important than ever . Introducing policy tools to consider whether new commercial, residential, tourism, leisure, social and community developments are financially viable will therefore be essential to their delivery.</p> <p>With this in mind, I note that Policy 4.2 states that landmark scale and quality buildings will be limited to public or arts uses. There is a strong risk this could be inflexible and unnecessarily limiting as it does not consider such uses may prove more difficult to finance, and thus deliver, than other forms of development.</p> <p>As viability may influence the form, mass and design of development proposals (e.g. the scale of new development set against any impacts on townscape</p>	<p>and/or cultural uses.</p> <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>LPB Policy 6.1 establishes that development may deliver its own</p>

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					<p>or important views to, from or within the HAAs), it is also vital that the DPA is provided with the appropriate policy tools to ensure positive outcomes that benefit the wider community can be achieved and competing considerations dealt with appropriately.</p> <p>It may also require the DPA to accept that not every development proposal will be able to make financial contributions toward the delivery of strategic infrastructure (e.g. flood defences, transport / active travel improvements etc).</p> <p>As similar provisions allowing for development viability are already contained within existing IDP policies MC2 and GP11, this could serve as a template for amendments to the draft LPB.</p> <p>3 BUILDINGS OF SCALE</p> <p>I am encouraged the draft LPB makes provision for development of varied scale across the HAAs, including through a number of Landmark Opportunity Zones. A greater mix and intensification of uses in the Mixed Use Regeneration and Intensification Zones is also encouraging.</p> <p>Under Policy 4.2, if a substantial</p>	<p>flood defence 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>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. The policies of the IDP and material considerations of the Planning Law will be used in balancing this assessment.</p> <p>The need to protect the heritage, culture and character of the HAAs</p>

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					<p>scale of development is required in such areas in order to make commercial or residential developments viable, and if the design is of the highest architectural quality and is appropriately integrated with its heritage, this should not be precluded. If it did, there is a risk it would undermine the potential of the HAAs. Particularly, in encouraging investment in the variety and scale of different economic, social and community uses, in addition to the contributions they might make to the strategic infrastructure.</p> <p>I would suggest these policies be amended to embed this flexibility from the outset. This will also provide decision makers with necessary tools to ensure positive outcomes for the wider community.</p>	<p>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 use 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 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>The draft LPB is intended to set high level strategic 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-</p>

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						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, particularly where there is dispute over viability issues. This approach is in line with the guidance in certain IDP Policies.
ANON-ACRH-DBRV-C (1)	Alun	Williams	Guernsey Health Improvement Commission	10/11/2024	<p>Response to draft local planning brief for the Harbour Action Areas for St Peter Port and St Sampson</p> <p>The Be Active team at the Health Improvement Commission is supportive of the overall vision for the Harbour Action Areas. References are made to changes which improve safety and the provision of alternative transport methods. The promotion of more active travel is a critical part of the Be Active workstream as a way to increase population levels of physical activity and proven benefits to physical and mental health, the economy and the environment. Increasing population levels of physical activity is also a core aim of States strategies including the Integrated on-island Transport Strategy, the Plan for</p>	<p>It is noted that this Representation appears to be a duplication of another Representation provided by the Guernsey Health Improvement Commission and as such the response is the same for both.</p> <p>In preparing the draft Local Planning Brief (LPB) for the St Peter Port and St Sampson Harbour Action Areas (HAAs), the importance of making it safe, healthy, efficient and easy for people and goods to get around was identified as one of six key themes which would underpin the Policies proposed in the draft LPB.</p> <p>LPB Policy 5.1 supports development which would improve access and provide facilities for active and sustainable travel, including (a) supporting a dedicated public transport link and improved cycle link between the two HAAs, (b)</p>

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					<p>Sport, the Children and Young People’s Plan and the Healthier Weight Strategy.</p> <p>We recognise that it is not feasible for everyone to swap all or even some car journeys to foot or bike, but we advocate for removing potential barriers. Improved or new bike lanes and more space for pedestrians will allow people to feel safer to access both centres and so we support specific recommendations around improving transport connectivity and choice between the main centres, through an improved cycle link and cohesive routes, bike parking provisions and mobility hubs.</p> <p>As part of the Better Transport plan there are significant housing developments planned for the north of the island. The Bridge will be within walking and cycling distance for many of these proposed developments, so we support the associated consideration of travel infrastructure, including bike lanes, bike parking and car sharing opportunities and the proposed mobility hubs. We would like the plan to consider reduced need for car parking and allow for more green space to be</p>	<p>encouraging and supporting the use of bicycles and E-bikes as well as improving routes and parking for bicycles, and (c) enabling the delivery of mobility hubs in the HAAs that support and encourage the use of sustainable and active travel. Active travel is further encouraged in the draft LPB through LPB Policy 5.2, which supports development that will improve implementation of the road user hierarchy, which seeks to prioritise pedestrian and bicycle transport methods where possible.</p> <p>As the provision of play areas is directly referenced in LPB Policies 4.1, 5.2 and 6.3, the draft LPB is broadly supportive of the play area/playable spaces development identified in this Representation. Furthermore, LPB Policies 3.3, 4.1 and 5.3 are all supportive of development which makes a positive contribution towards the public realm within the HAAs, which in turn encourages people to spend more time in these areas and provides opportunities for active and informal playable spaces.</p> <p>However, it should be noted that the draft LPB intentionally does not detail specific developments which should come forward for specific sites within the HAAs. Instead, the draft LPB is a strategic policy</p>

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					<p>retained, and potentially used to provide residents and visitors to the areas with spaces for other health enhancing informal activity.</p> <p>Play and play areas</p> <p>There are references to play and play areas in the planning inquiry document (pages 58,61 and 67). However the Health Improvement Commission suggests that more opportunities are taken to create play spaces.</p> <p>The importance of play and play areas:</p> <ul style="list-style-type: none"> • Play is a vital part of growing up. • Children’s physical and mental health, physiology, wellbeing, social development and sense of belonging are all strongly shaped by the places they grow up. <p>What do we mean by play areas/ playable spaces?</p> <ul style="list-style-type: none"> • Playable spaces do not just mean traditional locations such as formalised playgrounds and parks. Multi-purpose, freely accessible spaces, such as squares, pedestrianised streets and walkways allow for exciting play spaces. A mixture of more formal play spaces such as playgrounds and of “playable” places is required. 	<p>document, establishing a high-level policy framework which will provide the gateway policies and guidance to allow development proposals to come forward in a coordinated manner. Subject to approval from the States, the LPB will become an addition to the Island Development Plan, providing a policy framework and guidance within which specific proposals for developments can come forward.</p>

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					<ul style="list-style-type: none"> • The aim should be to integrate the potential for play into public space more widely and make it accessible to a wider range of the public, not just young people. • Places must be safe and welcoming. • They must be directly accessible from families' doorsteps crucially with walking and cycling infrastructure and public transport options that allow them to get around easily on their own to these. • Even in a beautiful, natural environment like Guernsey places and opportunities to play in local areas have declined in recent decades. There have been several reasons for this decline: Traffic danger, loss of space and real and perceived safety issues. Consulting with children and young people: <ul style="list-style-type: none"> • Children and young people are the population group who are most affected by poor planning and have most to gain from well-planned housing and neighbourhoods where their needs are fully considered. • Children experience places differently to adults and have valuable insights to offer. <p>At the Health Improvement</p>	

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					<p>Commission we have engaged with children, primarily through Education Establishments, to seek their views on a range of issues. Their responses are always thought-provoking, refreshing, creative and fun. An example of this was the engagement of Notre Dame pupils in discussing town regeneration; https://d3qb9i95n0tpqj.cloudfront.net/media/Advocacy and Policy/Notre Dame Town Document_V4.pdf</p> <p>Concluding remarks</p> <p>The Health Improvement Commission frequently responds to public consultations on developments and enhancements to the Bailiwick of Guernsey environment. Our message has been consistent. The integration of health improvement into the design of places and spaces, accessible to everyone, should be the key principle in all decisions about developing the island.</p> <p>Enclosed are links to the responses that we have made. The principles have remained the same:</p> <ul style="list-style-type: none"> • Physical activity should be a prominent feature of any future provision. 	

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					<ul style="list-style-type: none"> • Build an environment that makes it easy to be active. • Provision should support healthy living by encouraging, incentivising and promoting healthy behaviours. • Seek the views of a variety of stakeholders including children and their families. <p>Examples of Health Improvement Commission responses to consultations about the environment:</p> <p>Seafront Enhancement project Response to the consultation on the Leale's Yard Regeneration Framework Healthy , vibrant and fun - our response to the town Regeneration framework</p> <p>Examples of existing local small space initiatives:</p> <p>The sports court at les Genats estate is an example of a successful playable space at the heart of the community, literally on the doorstep, which allows agencies such as the Sports Commission to provide sporting activities for children and families without the need for them to travel.</p> <p>The four Petanque Terrains at QE2 Marina provide valuable play spaces (and have now been replicated at College field and Sylvans Football Club)</p>	

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					<p>Areas like the Model Yacht Pond also allow for a range of activities for all ages.</p> <p>In Jersey, they have incorporated a 'dancing fountains' display as part of their developments. This is particularly popular with younger families and during the summer, children love running in and out of the fountains.</p> <p>Bike markings at Beau Sejour and Saumarez Park allow children to practice their bike skills in a safe environment.</p> <p>Natural, unplanned spaces are often the most popular play areas for children. This fallen tree in Saumarez Park was very popular for climbing for children of all ages.</p>	
ANON-ACRH-DBRV-C (2)	Alun	Williams	Guernsey Health Improvement Commission	10/11/2024	<p>Response to draft local planning brief for the Harbour Action Areas for St Peter Port and St Sampson</p> <p>The Be Active team at the Health Improvement Commission is supportive of the overall vision for the Harbour Action Areas.</p> <p>References are made to changes which improve safety and the provision of alternative transport methods. The promotion of more active travel is a critical part of the Be Active workstream as a way to increase population levels</p>	<p>It is noted that this Representation appears to be a duplication of another Representation provided by the Guernsey Health Improvement Commission and as such the response is the same for both.</p> <p>In preparing the draft Local Planning Brief (LPB) for the St Peter Port and St Sampson Harbour Action Areas (HAAs), the importance of making it safe, healthy, efficient and easy for people and goods to get around was identified as one of six key themes which would underpin the Policies proposed in the draft LPB.</p>

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					<p>of physical activity and proven benefits to physical and mental health, the economy and the environment.</p> <p>Increasing population levels of physical activity is also a core aim of States strategies including the Integrated on-island Transport Strategy, the Plan for Sport, the Children and Young People’s Plan and the Healthier Weight Strategy.</p> <p>We recognise that it is not feasible for everyone to swap all or even some car journeys to foot or bike, but we advocate for removing potential barriers. Improved or new bike lanes and more space for pedestrians will allow people to feel safer to access both centres and so we support specific recommendations around improving transport connectivity and choice between the main centres, through an improved cycle link and cohesive routes, bike parking provisions and mobility hubs.</p> <p>As part of the Better Transport plan there are significant housing developments planned for the north of the island. The Bridge will be within walking and cycling distance for many of these proposed developments, so we support the associated</p>	<p>LPB Policy 5.1 supports development which would improve access and provide facilities for active and sustainable travel, including (a) supporting a dedicated public transport link and improved cycle link between the two HAAs, (b) encouraging and supporting the use of bicycles and E-bikes as well as improving routes and parking for bicycles, and (c) enabling the delivery of mobility hubs in the HAAs that support and encourage the use of sustainable and active travel. Active travel is further encouraged in the draft LPB through LPB Policy 5.2, which supports development that will improve implementation of the road user hierarchy, which seeks to prioritise pedestrian and bicycle transport methods where possible.</p> <p>As the provision of play areas is directly referenced in LPB Policies 4.1, 5.2 and 6.3, the draft LPB is broadly supportive of the play area/playable spaces development identified in this Representation. Furthermore, LPB Policies 3.3, 4.1 and 5.3 are all supportive of development which makes a positive contribution towards the public realm within the HAAs, which in turn encourages people to spend more time in these areas and provides opportunities for active and informal</p>

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					<p>consideration of travel infrastructure, including bike lanes, bike parking and car sharing opportunities and the proposed mobility hubs. We would like the plan to consider reduced need for car parking and allow for more green space to be retained, and potentially used to provide residents and visitors to the areas with spaces for other health enhancing informal activity.</p> <p>Play and play areas There are references to play and play areas in the planning inquiry document (pages 58,61 and 67). However the Health Improvement Commission suggests that more opportunities are taken to create play spaces. The importance of play and play areas:</p> <ul style="list-style-type: none"> • Play is a vital part of growing up. • Children’s physical and mental health, physiology, wellbeing, social development and sense of belonging are all strongly shaped by the places they grow up. <p>What do we mean by play areas/ playable spaces?</p> <ul style="list-style-type: none"> • Playable spaces do not just mean traditional locations such as formalised playgrounds and 	<p>playable spaces.</p> <p>However, it should be noted that the draft LPB intentionally does not detail specific developments which should come forward for specific sites within the HAAs. Instead, the draft LPB is a strategic policy document, establishing a high-level policy framework which will provide the gateway policies and guidance to allow development proposals to come forward in a coordinated manner. Subject to approval from the States, the LPB will become an addition to the Island Development Plan, providing a policy framework and guidance within which specific proposals for developments can come forward.</p>

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					<p>parks. Multi-purpose, freely accessible spaces, such as squares, pedestrianised streets and walkways allow for exciting play spaces. A mixture of more formal play spaces such as playgrounds and of “playable” places is required.</p> <ul style="list-style-type: none"> • The aim should be to integrate the potential for play into public space more widely and make it accessible to a wider range of the public, not just young people. • Places must be safe and welcoming. • They must be directly accessible from families’ doorsteps crucially with walking and cycling infrastructure and public transport options that allow them to get around easily on their own to these. • Even in a beautiful, natural environment like Guernsey places and opportunities to play in local areas have declined in recent decades. There have been several reasons for this decline: Traffic danger, loss of space and real and perceived safety issues. Consulting with children and young people: <ul style="list-style-type: none"> • Children and young people are the population group who are most affected by poor planning and have most to gain from well-planned housing and 	

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					<p>neighbourhoods where their needs are fully considered.</p> <ul style="list-style-type: none"> • Children experience places differently to adults and have valuable insights to offer. <p>At the Health Improvement Commission we have engaged with children, primarily through Education Establishments, to seek their views on a range of issues. Their responses are always thought-provoking, refreshing, creative and fun. An example of this was the engagement of Notre Dame pupils in discussing town regeneration;</p> <p>Please see link document: https://d3qb9i95n0tpqj.cloudfront.net/media/Advocacy%20and%20Policy/Notre%20Dame%20Town%20Document_V4.pdf</p> <p>Concluding remarks The Health Improvement Commission frequently responds to public consultations on developments and enhancements to the Bailiwick of Guernsey environment. Our message has been consistent. The integration of health improvement into the design of places and spaces, accessible to</p>	

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					<p>everyone, should be the key principle in all decisions about developing the island.</p> <p>Enclosed are links to the responses that we have made. The principles have remained the same:</p> <ul style="list-style-type: none"> • Physical activity should be a prominent feature of any future provision. • Build an environment that makes it easy to be active. • Provision should support healthy living by encouraging, incentivising and promoting healthy behaviours. • Seek the views of a variety of stakeholders including children and their families. <p>Examples of Health Improvement Commission responses to consultations about the environment:</p> <p>https://d3qb9i95n0tpqj.cloudfront.net/media/resources/images/seafront_enhance_pa_sp_wb_2018.pdf</p> <p>https://d3qb9i95n0tpqj.cloudfront.net/media/Advocacy%20and%20Policy/2652020-our-response-to-the-consultation-on-the-leales-yard-regeneration-framework.pdf</p>	

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					<p data-bbox="1256 145 1659 280"> https://d3qb9i95n0tpgj.cloudfront.net/media/Advocacy%20and%20Policy/Town%20regeneration%20proposal_V10_Small.pdf </p> <p data-bbox="1256 325 1659 384"> Examples of existing local small space initiatives: </p> <ul data-bbox="1256 395 1659 1458" style="list-style-type: none"> <li data-bbox="1256 395 1659 746"> • The sports court at les Genats estate is an example of a successful playable space at the heart of the community, literally on the doorstep, which allows agencies such as the Sports Commission to provide sporting activities for children and families without the need for them to travel. <li data-bbox="1256 791 1659 963"> • The Petanque Terrains at QE2 Marina provide valuable play spaces (and have now been replicated at College field and Sylvans Football Club). <li data-bbox="1256 1008 1659 1283"> • In Jersey, they have incorporated a ‘dancing fountains’ display as part of their developments. This is particularly popular with younger families and during the summer, children love running in and out of the fountains. <li data-bbox="1256 1327 1659 1458"> • Bike markings at Beau Sejour and Saumarez Park allow children to practice their bike skills in a safe environment. 	

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					<ul style="list-style-type: none"> Natural, unplanned spaces are often the most popular play areas for children. This fallen tree in Saumarez Park was very popular for climbing for children of all ages <p>Please note that a version of this response has been forwarded by email as it includes photos and links that could not be included on the online submission.</p>	
ANON-ACRH-DBRZ-G (1)	Alan	Bates	Mat Desforges of Guernsey Electricity Limited on behalf of Alan Bates	10/14/2024	<p>PART A - 2 parts</p> <p>Please find herein initial representations to the Draft Local Planning Brief for the St Peter Port and St Sampson Harbour Action Areas, on behalf of Guernsey Electricity Limited.</p> <p>As a provider of critical national infrastructure, and the sole supplier of retail electricity to homes and businesses on the island, we welcome the opportunity to provide initial comments on the draft local planning brief. We have indeed been engaged in your work to date and remain grateful for your consideration of our interests in your work so far. Furthermore, we maintain regular and productive dialogue with other States of Guernsey stakeholders including the States Trading Supervisory Board, providing the</p>	No response required on this part of GELs representation.

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					<p>shareholder function for States Trading Assets and the Committee for the Environment and Infrastructure, who's the remit includes Energy Policy and Strategy as well as the Committee for Economic Development and the Electricity Strategy Steering Group.</p> <p>With our essential electricity production operations based at our Vale Power Station site on Northside, and our fuel imports reliant on the St Sampson Harbour, we consider ourselves to be a key stakeholder in any development planning for the Harbour and surrounding areas.</p> <p>In our representation we have sought to achieve three key aims for the development and planning authority to absorb:</p> <ol style="list-style-type: none"> 1) To ensure a clear understanding of our current and future operational requirements and strategic plans. 2) To offer our position on the vision, objectives and policies expressed in the Draft Local Planning Brief (LPB) which are directly related to our business. 3) To clarify or correct any inaccuracies withing the LPB and its accompanying information about our essential operations, such that your further work is based on the correct information. 	

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					<p>We trust that you accept our comments and representations as intended: constructive, collaborative and in pursuit of the right overall outcomes for our community. Our views will no doubt, in some cases, be contrary to those expressed by other stakeholders and indeed, your own.</p> <p>We would of course welcome further dialogue and consultation going forward to consider any point in more detail.</p> <p>1) GEL's current and future operational requirements and strategic plans</p> <p>GEL supplies all of the island's homes and businesses with the retail supply of electricity. Our head offices and primary operational centre are located on Northside at the Vale Power Station. The site spans a relatively large area of 'The Bridge' community and elements of the site lie within the Mixed-Use Regeneration and The Bridge Core Mixed Use zones of the Harbour Area Action (HAA) Boundary. Other elements of the site lie outside of the HAA Boundary.</p> <p>The supply of electricity for the island is predominantly provided for by importing electricity from</p>	

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					<p>the European continent via subsea power cables connecting Guernsey to Jersey and Jersey to France. Over the course of the year, more than 90% of the islands power is provided through importation. The Vale Power Station provides the remainder of the electricity requirements (save for a small proportion provided by local renewable generation on island). As such, the Vale Power Station is very much operational and provides supplementary electricity generation on a daily basis for around 6 months of the year, during winter when electricity demands are higher.</p> <p>The Power Station is also retained in good order and readiness throughout the year to be able to take over from imported power if a disruption on the European connection occurs. It therefore plays a critical role in ensuring security of electricity supply for the island community. Regular maintenance and test running ensures reliability of the plant.</p> <p>Power generation relies on the importation and bulk storage of fuel oils, which are currently delivered by sea tanker via St Sampson's Harbour. Sea tankers offload fuel oil at the North Quay</p>	

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					<p>into the bulk storage terminal at the SE of the Power Station site, via a buried pipeline. Smaller proportions of light diesel fuel oil are stored on site and used in power generation. This product is delivered by road tanker.</p> <p>There are 10 generators at the Vale Power Station ranging from 45 years in service to 7 years in service. The full lifecycle of a generator may last between 50 and 60 years taking into account its planning, installation, full life operation and decommissioning cycle. As such, any investments made at this location within the current decade could still be in place towards the end of the current century.</p> <p>GEL has long been planning to enhance the interconnection between Guernsey and Europe, either directly to France or through additional connection via Jersey. Doing so would increase the capacity to import and the resilience of the import supply chain. This would allow the existing Power Station to evolve its operations and rationalise its fleet of generating assets. However, countering this opportunity to rationalise, is the growing demand for electricity arising from the transition from fossil fuels to electrically</p>	

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					<p>powered heating and transport which is driving up the need for more power generation capacity to provide security of supply. This is all in line with the 2023 States' Electricity Strategy for Guernsey. The Vale Power Station not only comprises power generation and bulk fuel storage but is also the location of the central control facility of the islands power grid and some critical components of the power distribution network. In addition, the head office, retail outlet, commercial electrical and plumbing, strategic spares storage, back office and front-line operations are all based at this location. With some of these assets being below surface level, flood risk and mitigation is of key importance in provisioning the site and area for the long-term environmental threats.</p> <p>Whilst circumstantial through the gradual development of the surrounding area over the last hundred or so years, it is recognised by GEL that the existing location of the Power Station is somewhat undesirable, being partially surrounded by domestic and commercial development, being within the heart of the island's second town, and creating an aesthetic challenge in the island vista. We</p>	

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					<p>therefore welcome the opportunity to engage on long term planning and spatial provisioning for the future of power generation and associated operations on the island.</p> <p>For further insights into GEL's operations and future plans, please refer to our 2035 Strategic Vision available on our website at 15165-vision-2035-web.pdf (electricity.gg)</p> <p>2) Comments on the policies outlined</p> <p>Below we provide an initial high-level position on the objectives and policies that directly relate to our core business. We have deliberately chosen not to provide an in-depth commentary or analysis, rather we state our position and invite participation in further dialogue on any of these points should that be helpful.</p>	
ANON-ACRH-DBRZ-G (2)	Alan	Bates	Mat Desforges of Guernsey Electricity Limited on behalf of Alan Bates	10/14/2024	<p>PART B</p> <p>Overall Objectives</p> <p>Theme 1: Resilient harbours and infrastructure – “Consideration will also be given to possible locations for a future harbour...”</p> <p>We would stress the current dependency of the Vale Power Station on the St Sampsons Harbour for bulk fuel oil supplies. The current close proximity of</p>	<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 or all Power Station operations, either as a result of implementation of further</p>

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					<p>the offloading point to the bulk storage facility is favourable. Any relocation of the off-loading point would need to consider the transfer of infrastructure involved and/or the capability of conveying higher viscosity fuels to the existing site</p> <p>St Sampson Vision and Objectives</p> <p>Vision: "Industrial uses will be safeguarded for employment, but gradually moved away from the inner harbour to enable better access to the water for marine related used, mixed-use development, including housing, and leisure activities."</p> <p>We would support this vision however we also assert that, owing to the very long-term nature of power generation and distribution assets, any ambitions to transition power generation and distribution assets and operations completely away from the incumbent site be taken with very long-term planning horizons (50+ years) in mind.</p> <p>Theme 1: Resilient harbours and infrastructure – "Focus on the relocation of critical uses such as fuel storage and secondary power generation to Longue Hougue or elsewhere on the island as needs change through decarbonisation."</p>	<p>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.</p> <p>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 1.4 supports development which would lead to the relocation of fuel storage around St Sampson harbour to alternative locations in order to minimise the spatial impacts of the Major Hazards Public Safety Zones. In response to a Representation from the Committee for the Environment & Infrastructure, the Development & Planning Authority has given its support to referencing energy resilience as a core theme of the draft LPB and for including</p>

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					<p>We would support the intention to move industrial facilities to Longue Hougue as a matter of principle. We do however stress the importance of co-location (or minimising separation distances) between bunker fuel off-loading, bulk fuel storage and power generation facilities. A strategic approach to transition from the incumbent power station site to an alternative site at, for example, Longue Hougue is likely to require several decades of dual operations, including the handling and storage of bulk fuel oil. It is also pleasing to see recognition that power generation may in future be optimally located elsewhere on the island. However, we stress that such a possibility should not be viewed as a shorter term solution, and thus reason not to allow for spatial provisioning for power generation in the area of interest at this stage.</p> <p>Theme 3: New and expanded uses and activities within the Harbour Action Areas – “Relocating ‘bad neighbour’ uses such as fuel storage and the power station over time...”</p> <p>Per earlier comments we support the vision that drives the need to relocate ‘bad neighbour’ activities. Again, we stress that</p>	<p>additional detail in LPB Policy 1.4 to require consideration for how development maintains and or enhances the Island’s energy resilience as part of any relocation of fuel storage in St Sampson.</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 different areas. LPB Policy 4.2 aims to secure that the heritage and character of the HAAs is not overlooked or poorly considered in</p>

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					<p>very long-term planning horizons are necessary.</p> <p>Theme 4: Culture, heritage, tourism and leisure – “Making the most of the strong character and particular features around St Sampsons Harbour...”; “Celebrating the heritage assets around and within the harbour...”</p> <p>We would point out that the GEL building ‘Electricity House’ is c.125 years old, is the original power generation building, augmented over the years, and is considered by some as iconic within the area. It is important to consider and consult with GEL as to the degree of cultural value this building is considered to possess by relevant stakeholders, also in view of Theme 3 and its desire to create more leisure / F&B facilities along Northside.</p> <p>Theme 6: Climate Resilience and the Natural Environment – “The use of alternative / renewable energy sources will enable the reuse or redevelopment of the power station as it comes to the end of its life...”; “To fully explore the potential for new coordinated flood protection measures to also contribute to energy generation...”</p> <p>With regard to the first statement, we would strongly challenge this assertion. Whilst</p>	<p>development proposals. Guidance on the heritage and character of existing areas within the St Sampson HAA will be provided via the St Sampson Conservation Area Appraisal, which is due to be published shortly. The Development & Planning Authority is supportive of amending the supporting text to LPB Policy 4.2 to correct reference from the ‘St Sampson Heritage and Character Assessment’ to the ‘St Sampson Conservation Areas Appraisal’.</p> <p>There is no identified Major Hazards Public Safety Zone around the power station as fuel storage in relation to the operation of the power station does not present the same hazards as at the fuel storage areas around St Sampson harbour. As such the Development & Planning Authority acknowledges that the supporting text to LPB Policy 1.3 is overly restrictive. However, proximity to the power station should be a consideration when considering development proposals particularly with regard to potential impacts on proposals for sensitive land uses such as housing. Whilst it is not the intention that the LPB will preclude development in proximity to the power station and the LPB does not set any additional requirements should highlight IDP Policy GP17</p>

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					<p>renewable energy generation may provide supplementary supplies of power into the system, most cost-effective forms of renewable power are, by nature, intermittent. That distinct characteristic requires a dependable and flexible form of power generation to complement it and this can take the form of interconnection or thermal power plant, the latter being required in any case, as the island's critical security of supply infrastructure. Further, whilst elements of the existing power station are approaching the end of their service life, many elements are only recently installed and have many years in service remaining. The power station requires ongoing investment in new assets, assets which will remain in service for 50+ years. Indeed, the States of Guernsey 2023 Electricity Strategy for Guernsey recognises the requirement for on island power generation for back-up and top-up purposes as part of the recommended future pathway.</p> <p>In terms of the second statement, we would support the inclusion of energy generation schemes as a supplementary benefit associated with any flood</p>	<p>which will remain relevant. This requires that 'proposals for development with the potential to cause, increase or be affected by significant risks to public health or safety will include an assessment of the risk of harm and set out measures to satisfactorily address the risks arising from the proposals. Proposals will not be supported if the level of risk to public health or safety associated with the development is considered to be unacceptable". The Development & Planning Authority is therefore supportive of amending the supporting text to LPB Policy 1.3 to remove reference to the power station preventing delivery of neighbouring sensitive land uses and replace with 'Proximity to the power station may impact on the delivery of neighbouring sensitive land uses such as housing, high intensity employment uses such as offices or workspace, community, cultural or mixed uses. Development proposals within the proximity of the power station should consider IDP Policy GP17: Public Safety and Hazardous Development".</p> <p>The Development & Planning Authority is supportive of amending the draft LPB to reflect that the power station uses heavy fuel oil and diesel and not gas.</p>

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					<p>defence measures, subject to an adequate business case.</p> <p>Development Themes and Policies</p> <p>Policy 1.3 Reducing the impact of the power station at St Sampson</p> <p>We would agree with many of the principles and the general intent of the policy, however we stress the following key points, some of which have already been made earlier in our response:</p> <p>a) The power station is not only a power generation facility but is also the home of the central power system control centre; key nodal assets within the islands electricity distribution system; operational headquarters and back-office locations; retail outlet and commercial electrical and plumbing centres. It is also therefore noteworthy that the facility is one of the larger employers within the Bridge community, whose employees play an important role in supporting the broader economic activity within the locality.</p> <p>b) Generation and distribution assets have life expectancies of 50+ years, meaning some existing assets will still be in service in 40+ years' time. Further, pressing needs to enhance generation capacity on site mean it is likely that elements of the site will</p>	<p>The Development & Planning Authority is supportive of amending the wording of theme 6 of the St Sampson objectives so that it references that alternative/renewable energy sources may enable the reuse or development of the power station.</p>

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					<p>remain an operational power station for at least a further 60+ years. Any intent to transition power generation and distribution activities away from the incumbent site must be considered with very long-term planning horizons. In our view we would suggest developing an area masterplan vision for 2100 to assist in this approach – this may indeed be part of your next stages of planning.</p> <p>c) The most visually intrusive elements of the power station are of course the chimney (exhaust) stacks. Whilst the ‘C-Station’ cylindrical steel stack is nearing the end of its operational life, the ‘D-Station’ square profile concrete stack is a component of the station’s newest generators and is expected to remain in service for many decades to come.</p> <p>d) Transitioning power generation and distribution activities out of the incumbent site will depend on adequate spatial provisioning elsewhere. Whilst the exact spatial requirements for generators, auxiliary services (such as fuel storage) and visual impact will likely differ to what exists today, there will always be a need for local power plant in some form,</p>	

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					<p>as per the 2023 Electricity Strategy.</p> <p>e) The policy states that “the power station prevents the delivery of neighbouring sensitive land uses such as housing, high intensity employment uses such as offices or workspace, community, cultural or mixed uses.” On this point we would be pleased to understand which particular elements of the existing power station operations create this prevention, and which elements could potentially continue on the existing site without causing this challenge, for example, continuation electricity distribution and back-office operations would appear to suit the policy intentions.</p> <p>Policy 1.4 Fuel Storage in St Sampson</p> <p>We recognise the ‘bad neighbour’ classification of fuel storage and its visual impact, environmental and major hazards / safety challenges. Naturally therefore we support the policy intent to relocate fuel storage for risk mitigation and to enhance the prospects for residential and commercial development. However, we highlight the challenge that geographical distancing between fuel off-loading, fuel storage and fuel use</p>	

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					<p>presents particularly in respect of heavy fuel oils which are used in power generation and which have particular challenges in storage and handling that other fuel oils do not, specifically high viscosity and the need to be heated to facilitate handling.</p> <p>General Comments</p> <p>As a general point, we note that Longue Hougue is cited as the potential and desirable future location for many different use cases (water access; marina uses and related marine industries / marine economy; power generation; fuel storage). We support its use as a zone of industrial activity but have concern that it may not offer the answer to all such activities, unless significantly expanded in size. This support in principle also assumes that there is appropriate action to mitigate various risks associated with the site including those from climate change such as potential flooding.</p> <p>3) Clarifications and Corrections</p> <p>In this section we have taken the opportunity to make any clarifications or corrections in relation to the material presented or referred to in the Draft LBP.</p> <p>a) Policy 1.3 refers to the use of</p>	

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					<p>non-renewable gas as a primary power source. We would like to clarify that the primary power source for Guernsey is imported low carbon electricity from Europe which provides in excess of 90% of the island electricity needs through the year. The local power generation facility supplements this whilst providing security of supply in the event that imports become unavailable either short term or long term and planned or un-planned. The power station currently runs on non-renewable fuel oils.</p> <p>b) Appendix 4.5 provides background information on electricity supply and demand in which we observe some inaccuracies. Whilst these are unlikely to be of an order that would alter the direction of travel, we still feel it necessary to highlight them.</p> <p>a. 2.1.4 - Overall Electricity Demand Outlook: Information is based on demand forecasting undertaken in 2019 by PWC. This work has since been superseded by the 2020 Energy Policy and the 2023 Electricity Strategy for Guernsey in which demand forecasting was updated as part of the scope of Siemens' contributing work. We would suggest basing future planning on</p>	

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					<p>this latest forecasting.</p> <p>b. 2.4 - Electricity Supply:</p> <p>i. Interconnection provides in excess of 90% of Guernsey's electricity requirements.</p> <p>ii. In relation to supply security and resilience, it is SoG policy for Guernsey Electricity to have sufficient capacity to meet maximum demand in the event that both the interconnector and two of its local power generation assets are simultaneously unavailable (N-2 on island generation provision).</p> <p>iii. There are 10 gensets at the Vale power plant, 7 of which operate on Very Low Sulphur Fuel Oil (VLSFO) and 3 of which burn Ultra-Low Sulphur Diesel (ULSD).</p> <p>iv. The gensets range in age from 7 to 45 years old</p> <p>c. 2.2.1 – Solar Power: Whilst the equivalent 'feed-in-tariff' in Guernsey is indeed low compared to what has been offered in the UK in the past, it is now comparably high compared to the various Smart Export Guarantees offered by suppliers in the UK which has now replaced the Feed in Tariff scheme.</p>	
ANON-ACRH-DBRD-T	Colin	Le Ray	States Trading Supervisory Board on Behalf of	10/14/2024	The States' Trading Supervisory Board is grateful for the opportunity to provide formalised feedback on the Local	The evidence gathering and consultation phases of the preparation of the draft Local Planning Brief (LPB) for the St Peter

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			Guernsey Ports		<p>Planning Brief for the Harbour Action Areas. The Board had previously provided comment on the initial scope in May 2024 and is grateful that this feedback has been included in the final draft local planning brief.</p> <p>Specifically, Guernsey Ports, acting on behalf of STSB, is grateful that the resilience of the Harbours and its associated infrastructure is recognised as a theme in its own right. It is noted that within the public consultation process, support for protecting the commercial harbour activity was the most unanimously agreed upon response out of all themes. This is clearly a key point both for the STSB and the public and continues to be demonstrated through existing conflicts of use, both on land and water. These challenges do need to be addressed in the medium term as they continue to present regular challenges for the Ports management team.</p> <p>Given pressures on Ports finances generally, it is widely accepted that income streams for the ports will have to continue to adapt and diversify. To that end, the proposed themes which identify the safeguarding of marine industries, promote the</p>	<p>Port and St Sampson Harbour Action Areas (HAAs) highlighted the importance of protecting the existing and predicted future requirements for land to facilitate Port operations. This directly informed the inclusion of 'Resilient harbours and infrastructure' as one of six key themes underpinning the draft LPB. This is further strengthened through LPB Policy 1.1, which establishes the Secure Port Area Consultation Zone and Port Growth Consultation Zone and identifies Guernsey Ports as a consultee for the Development & Planning Authority to engage with regarding any application for development within these Zones.</p> <p>Likewise, maximising social, environmental and economic opportunities through new and expanded uses and activities within the HAAs was also included as a key theme for the draft LPB. Ensuring sufficient land is retained to safeguard marine related industries and facilitating access to the water are key factors in supporting the marine leisure industry and providing economic opportunities for landowners, as referenced in this Representation. LPB Policy 2.2 supports developments which (a) retain and support the function and attractiveness of the harbours as a</p>

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					<p>potential expansion of property development particularly servicing the leisure, tourism and marine economies is particularly important for the Ports, as a significant landlord of property in the Harbour Action Area.</p> <p>It is recognised that the LPB cannot confirm a location for the future harbour, and the circumstances that have led this to be the case are understood by the STSB. Anything that can be done as part of this process to make any future planning inquiry for a future harbour provision more efficient, should be considered now and wherever possible.</p> <p>Appendix 4.5, being the detailed analysis on Future Space Requirements and Recommendations produced by Fisher Advisory Ltd has been reviewed in some detail as it is widely recognised this will have informed several of the policies established in the LBF.</p> <p>In general terms the Appendix is representative of the work undertaken by the Guernsey Ports as part of its Future Harbour Redevelopment work in 2021 and it captures the salient findings of that work. The overall forecasts for future space provision for port commercial</p>	<p>focus for marine leisure and resist any loss of space or access for water-based uses, and (b) support the provision of additional marine leisure facilities and services and other space that supports the main leisure industry in a way that is compatible with the other Policies in the LPB.</p> <p>Furthermore, LPB Policy 4.1 supports developments which expand tourism, leisure, culture and the arts through (a) new and expanded uses including visitor attractions, leisure uses, restaurants and cafes, high quality public realm, performance space, public art, arts and culture and to maintain the pattern of existing related uses, (b) establishing a new signage and communications strategy for the HAAs, and (c) consider, supporting and improving the visitor experience of those arriving on the island by boat, either on ferries, cruise ships, yachts or other means.</p>

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					<p>activity in this appendix are set relatively low when compared to the 'high' range parameters estimated in this former work, however there is a ready acceptance in the appendix that these requirements may be higher than estimated. It is also clear that the Ports requirements continually change and evolve over time and accordingly the broad estimate of additional area is correctly considered to be broadly representative of the Ports future space requirements. Included in this appendix is the future provision of additional land, is a notional area to support servicing of existing and expanded marine industry related activities. This is welcomed by Guernsey Ports.</p>	
ANON-ACRH-DBRC-S (1)	Chris	Crew	Collas Crill	10/14/2024	<p>General support</p> <p>I wish to register my strong support for the extremely positive scope and ambition of the draft LPB, setting out as it does a vision for the future of the HAAs that aims to support and encourage investment in a wide variety and scale of different economic, social and community uses whilst sustaining and enhancing the special characteristics and environmental quality of both</p>	<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</p>

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					<p>the St Peter Port and St Sampson harbours.</p> <p>Recognition that the LPB can help to deliver increased resilience to a range of current and future challenges, and that long term, large scale investment and new development will be required to achieve this resilience (through investment in strategic infrastructure amongst other things), is a key conclusion. This should be reiterated throughout the LPB policies to ensure that they are interpreted and applied positively, rather than negatively.</p> <p>Although the LPB alone cannot ensure that decisions on strategic infrastructure are taken during its lifetime, embedding a presumption in favour of new development within LPB policies from the outset will provide certainty and confidence to the wider community, making it more likely that development proposals and related investment will be brought forward.</p> <p>It is also important that the draft LPB be sufficiently flexible and provide decision makers with appropriate guidance and policy tools, that are able to adapt to</p>	<p>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 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.</p> <p>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 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>

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					changing circumstances that may arise in future.	The draft LPB has been prepared in order to set a high-level and flexible policy framework, establishing broad Policies which will guide development and provide flexibility for developers to identify specific development approaches which are aligned with the Policies. As the LPB will provide development guidance there will not be a requirement for separate Development Frameworks in these areas. The Development & Planning Authority supports clarification of this point in section 1.2 of the draft LPB.
ANON-ACRH-DBRC-S (2)	Chris	Crew	Collas Crill	10/14/2024	<p>Viability</p> <p>In order to realise the potential of the HAAs, and in particular to encourage investment in the variety and scale of different economic, social and community uses together with contributions to strategic infrastructure envisaged by the draft LPB, it is very important that LPB policies acknowledge and allow for consideration of development viability when determining future planning applications.</p> <p>At a time of continued high inflation and construction costs, the viability challenge has never been so acute. Ensuring that new commercial, residential, tourism, leisure, social and community</p>	<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>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</p>

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					<p>developments are viable will be essential to their delivery.</p> <p>This may require the DPA to balance competing considerations. Viability will undoubtedly influence the form and design of development proposals, and the DPA may need to reconcile tensions between the scale of new development set against any impacts on townscape or important views to, from or within the HAAs. It is therefore vital that the LPB provides positive direction covering such scenarios, and that the DPA is provided with the full range of policy tools to ensure that positive outcomes that benefit the wider community can be achieved.</p> <p>The DPA may also need to accept that not every development proposal will be able to make financial contributions toward the delivery of strategic infrastructure (e.g. flood defences, transport / active travel improvements etc).</p> <p>Similar provisions allowing for development viability to be taken into account are contained within existing IDP policies MC2 and GP11, the text to which could</p>	<p>viability requirements with the impact of those proposals on the historic environment and townscape of both St Peter Port and St Sampson's. The policies of the IDP and material considerations of the Planning Law will be used in balancing this assessment.</p> <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</p>

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					<p>serve as a template for amendments to the draft LPB.</p>	<p>development and reinforces the importance of considering the height of development in terms of impact on views and heritage.</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 use 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 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>Support of the vitality and vibrancy</p>

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						<p>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 as to reflect the type and scale of development that might be under consideration.</p> <p>LPB Policy 6.1 establishes that development may deliver its own flood defence 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 strategic 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</p>

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						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, particularly where there is dispute over viability issues. This approach is in line with the guidance in certain IDP Policies.
ANON-ACRH-DBRC-S (3)	Chris	Crew	Collas Crill	10/14/2024	<p>Approach to parking provision with the HAAs</p> <p>The draft LPB appears to envision a longer term reduction in car parking across the HAAs, which is welcomed for the opportunities to repurpose and make more effective and efficient use of existing single use areas that would bring.</p> <p>However, the wording of and interaction between draft policies 3.2 and 5.3 should be amended to make clear that, depending on the timing and nature of specific development proposals, a situation may arise where total parking provision within the HAAs actually increases for a period of time.</p>	<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 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</p>

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					<p>LPB policies should make clear that this would not be objectionable in and of itself, provided that measures to improve access to sustainable and active travel and support transport infrastructure improvements (where applicable) are proposed, and that the increased provision would enable re-allocation from other sites moving forward.</p> <p>This should remove the risk of otherwise acceptable development proposals that include additional parking (e.g. deck parking at Salerie Corner, as per scenario A2), being unnecessarily delayed due to specific development proposals or a strategy to deliver a reduction of parking on other parking areas not having been agreed.</p>	<p>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, 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 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>

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						<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 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>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</p>

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						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.
ANON-ACRH-DBRC-S (4)	Chris	Crew	Collas Crill	10/14/2024	<p>Minor corrections</p> <p>Minor inconsistencies requiring correction / clarification have been identified as follows:</p> <ul style="list-style-type: none"> - Scenario A1 (p.73) contradicts Proposals Map A with regard to the extent of the Port Growth Consultation Zone. The latter map is assumed to be correct. - Policy 4.1 includes no specific reference to visitor accommodation development, whereas potential for hotel development is mentioned in Scenario A2 (p.75). It would be beneficial if specific reference was made. 	It should be noted that the scenarios identified in pages 73 – 80 of the draft Local Planning Brief (LPB) for the St Peter Port and St Sampson Harbour Action Areas (HAAs) have been included to provide an illustration of the possible development that could arise from the guidance within the draft LPB, but the scenarios do not form part of the policy guidance set out in the draft LPB. However, the Development & Planning Authority acknowledges the minor inconsistency between the extent of the Port Growth Consultation Zone in Proposals Map A and Scenario A1. For clarity, the Port Growth Consultation Zone in Proposals Map A is accurate and the Development

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					<p>- The South Esplanades SATZ, as indicated on Proposals Map A, appears to have a second, faint layer of hatching that is not referenced in the key.</p>	<p>& Planning Authority would be supportive of amending Scenario A1 to reflect this.</p> <p>LPB Policy 4.1 supports development which would encourage and support a wide range of activities and uses within the HAAs that support tourism, leisure, culture and the arts. LPB Policy 4.1 (a) provides an indication of the types of uses which would be encouraged, and whilst this list is not intended to be exhaustive, it is acknowledged that the development of visitor accommodation would be aligned with the intent of this Policy. As such, for completeness, the Development & Planning Authority would be supportive of including visitor accommodation in the list of uses outlined in LPB Policy 4.1 (a).</p> <p>It is noted that there is a minor inconsistency between the Map and Key for the South Esplanades Sustainable and Active Transport Zone in Proposals Map A. The Development & Planning Authority is supportive of amending the colour of the South Esplanades Sustainable and Active Transport Zone Proposals Map A so that it matches the colour shown in the Key.</p>
ANON-ACRH-DBRC-S (5)	Chris	Crew	Collas Crill	10/14/2024	<p>Buildings of scale</p> <p>The draft LPB makes provision for</p>	<p>The draft Local Planning Brief (LPB) for the St Peter Port and St Sampson Harbour Action Areas (HAAs) has</p>

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					<p>development of varied scale across the HAAs, including through identification of a number of Landmark Opportunity Zones, and for a greater mix and intensification of uses in the Mixed Use Regeneration and Intensification Zones.</p> <p>Policy 3.2 sets out that proposals that bring about a more efficient and varied use of land will be supported, and that this will include a reduction in single use or single level areas, while Policy 6.2 identifies that more intensive and efficient development will be supported in locations that encourage combined journeys.</p> <p>Whilst this approach is welcomed, the indication in Policy 4.2 that landmark scale and quality buildings will be limited to public or arts uses is inflexible and unnecessarily limiting. It also fails to reflect that such uses may prove more difficult to finance, and thus deliver, than other forms of development. At a time of continued high inflation and construction costs, ensuring that development proposals are viable will be critical to their delivery.</p>	<p>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>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>

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					<p>If a substantial scale of development were required in order to make other commercial or residential developments viable, and if the design of such development represented the highest quality architecture that respects and could be successfully integrated with the heritage, setting and design quality of the HAAs, that should not be precluded.</p> <p>To do so would undermine the key objective to realise the potential of the HAAs, and in particular to encourage investment in the variety and scale of different economic, social and community uses together with contributions to strategic infrastructure envisaged by the draft LPB.</p> <p>Draft policies should be amended to embed this flexibility from the outset, to ensure that decision takers are provided with the full range of policy tools to ensure that positive outcomes that benefit the wider community can be achieved.</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.</p> <p>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> <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</p>

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						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.
ANON-ACRH-DBRC-S (6)	Chris	Crew	Collas Crill	10/14/2024	<p>Suggested amendments to policies relating to strategic flood defences</p> <p>Draft Policy 3.1 states that flood defences cannot be site specific, whereas Policy 6.1 sets out that provided flood risk assessment is carried out and new development protected against current and long term flooding, development proposals may deliver their own flood defence proposals or be required to make financial contributions to a wider</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 should be encouraged for these areas and establishing a number of Policies which provide guidance to potential developers to ensure development is aligned with the encouraged themes of development and comes forward in a coordinated and comprehensive manner.

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					<p>strategic solution.</p> <p>It is unclear why these policies contradict one another, but the latter approach is to be preferred, as this will allow for development to come forward in the interim while the States works towards making a decision on future strategic flood defences.</p> <p>Provided that flood risks to adjacent development and existing uses are not exacerbated, or that appropriate mitigation / defences are provided by the development proposal, this would support the LPBs key objective to realise the potential of the HAAs, and in particular to encourage investment in the variety and scale of different economic, social and community uses together with contributions to strategic infrastructure.</p> <p>Policy 3.1 should be amended to ensure consistency with Policy 6.1.</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. 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</p>

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						<p>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>LPB Policy 6.1 sets a formula by which the scale of development would be assessed and the consequent approach to flood defences would be developed. The level and type of defences required would be subject to vulnerability of use. Uses within vulnerability classifications A and B must meet further tests and be designed to include permanent flood defence measures which must not increase the flood risk to surrounding uses or the wider HAA or beyond. Developers must consult with the DPA when developing flood risk mitigation measures to ensure that they are aligned with a comprehensive approach to flood risk mitigation. The whole leads towards the comprehensive 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</p>

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						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.
ANON-ACRH-DBRC-S (7)	Chris	Crew	Collas Crill	10/14/2024	<p>Development Frameworks</p> <p>The draft LPB makes clear that it will not conflict with or change any of the policies in the IDP (section 1.2).</p> <p>In general terms this approach is supported.</p> <p>However, various IDP policies (and IDP Annex III) indicate that a Development Framework will or may be required where residential or commercial development exceeds certain specified thresholds.</p> <p>To require the preparation and adoption of multiple Development Frameworks across</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 should be encouraged for these areas and establishing a number of Policies which provide guidance to potential developers to ensure development is aligned with the encouraged themes of development and comes forward in a coordinated and comprehensive manner.</p> <p>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</p>

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					<p>the HAAs (as would inevitably be required given their scale and the variety of uses / development envisaged by the draft LPB) would introduce further complexity and unnecessary burdens on both applicants and the DPA, further impacting on viability.</p> <p>The LPB provides sufficiently clear policy direction and practical guidance to developers and others as to how a site could be developed beneficially, and it should be made clear that IDP requirements in relation to Development Frameworks will not apply within the HAAs.</p> <p>To do otherwise would undermine the key objective to realise the potential of the HAAs, and in particular to encourage investment in the variety and scale of different economic, social and community uses together with contributions to strategic infrastructure envisaged by the draft LPB.</p>	<p>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 an LPB. As the LPB will provide development guidance there will not be a requirement for separate Development Frameworks in these areas. The Development & Planning Authority supports clarification of this point in section 1.2.</p>
ANON-ACRH-DBJQ-Y	John	Gollop	Living Streets	10/14/2024	<p>Firstly I think we cannot really move forward until a new harbour site is chosen. On balance I would prefer development of the east arm of St Peter Port to Longue Hougue for tidal and environmental</p>	<p>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</p>

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					<p>reasons and maintaining vitality for the town.</p> <p>I support enhancing the culture and leisure and arts of town with new theatre cinema music possibilities and excellent restaurants and using part of the piers for events happenings and public art .</p> <p>I support underground parking at north beach and possibly at the south esplanade and multi storey car parks elsewhere .</p> <p>I am wary of creating a transport bus hub at the north beach as this is. Bleak area at winter and would cut off the south of town for commuters, locals, shoppers tourists and disabled people. Think about pedestrians bus users and others who actually need the services as well as old quarter residents . The quay bus stops are very well used throughout the year .</p> <p>We need more housing in town and I think North Beach is a possibility The town and St Sampsons should be enhanced and redesigned to encourage public transport use and active travel . The main quay road should be narrowed with cafe restaurants pavements style</p>	<p>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>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 Hogue 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. This approach will provide flexibility to the draft LPB to respond to future decisions of the States regarding the development of strategic infrastructure.</p> <p>The preparation of proposals for future harbour infrastructure is</p>

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					<p>encouraged.</p> <p>A pool marina , more space for both local and high net worth boats and a blue leisure economy must be encouraged. If the bus station terminal stays where it is , my preference it should be landscaped and reduced in size with less space perhaps for spare buses to park .</p> <p>We need a permanent street market and charming quays like we see in Roscoff and Bristol etc.</p> <p>The Victor Hugo centre should be an amazing draw. Sports too could be useful and space for therapy pets too.</p> <p>I support a new Bridge for St Sampsons removing industrial and unloading areas eastward and concentrating the existing Bridge and Southside Northside areas as leisure residential cafe areas with new developments of housing with sea views both part ownership and social housing and private executive aspirational housing . We need to make the Bridge an upmarket desirable area and improve hospitality and leisure and retail facilities with new offices too.</p>	<p>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>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>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 in both HAAs 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 also supports the existing and future residential population in and around these areas. It has considered the need for commercial expansion within the HAAs and surrounding</p>

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					<p>Community hubs as part of a partnership of purpose for health and wellness would fit well on the Bridge and in town too. A long awaited library and restoration of a cinema theatre would be good too as well as enhancing the area around the Clock tower the ancient church and the Vale Castle opposite , the Development Agency have some useful ideas here too and I would support artistic innovations and creative architecture with mandatory public art .</p> <p>More bus services a transport hub better cycle facilities and maybe a light railway tramway would be powerful resources as would more green areas parks and water parks too .</p> <p>We need creative investment. Big boats and fuel need to be moved further east . I would support a cruise liner pier .</p>	<p>areas, the culture, visitor economy and tourism and accessibility and appearance of Town and the Bridge.</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 HAAs would best fit together in order to create areas with</p>

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						<p>coordinated and clear uses which maximise the use of space. For example, 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> <p>In St Peter Port, LPB Policy 3.3 will focus tourism and leisure pursuits in the areas of the Castle Pier, Albert</p>

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						<p>Pier and Victoria Pier with softer leisure uses at Havelet. Commercial, residential, tourism, leisure and cultural uses would be consolidated at North Beach and La Salerie. There would be a focus on improvements to the public realm, including pedestrian infrastructure and active travel, which in turn would serve existing businesses in the central esplanades. This will be supported by LPB Policy 5.3, which supports development that reduces the visual impact of parking along the Piers through changes in management arrangements, improved signage and better travel choice. 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. 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</p>

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						<p>impact of car parking and retaining or improving individuals' ability to access these areas.</p> <p>LPB Policy 6.3 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.</p> <p>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).</p> <p>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</p>

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						<p>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 specifically seek to reduce the volume of parking in these areas.</p> <p>LPB Policy 3.2 seeks to achieve more efficient land uses in the HAAs, which may include consolidated and optimised car parking such that it better supports shops and businesses. 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>The LPB identifies areas in both HAAs where mobility hubs may be located. As highlighted in the representation from the Committee for the Environment & Infrastructure mobility hubs are designed to bring both public transport and active</p>

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						<p>travel together in one space, with the concept being widely implemented in European and North American cities. Collectively placing these forms of transport in one location is known to make them more appealing to users. Mobility Hubs improve convenience, including providing the ability to change between bus routes more seamlessly or changing from a bus to a bike or foot for different parts of a journey. They are also known to improve safety for users, especially those who are more vulnerable. Providing one space for inclusive modes of transport also improves accessibility. It is intended that the provision of a mobility hub as per the guidance in LPB Policy 5.1 would supplement the existing bus service and would not impact service to other bus stops.</p> <p>It should be noted that the delivery of development in accordance with the draft LPB need not necessarily require public funding. In preparing the draft LPB, consultation was undertaken with potential developers, including the Guernsey Development Agency, in order to ensure that the draft LPB facilitates development which is achievable. It is not within the scope of the draft LPB to specify how development should come forward or who should</p>

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						be responsible for delivering development. However, the Policies proposed in the draft LPB have been prepared to encourage and facilitate private investment and for development to come forward in a coordinated approach into the HAAs.
ANON-ACRH-DBJP-X	Jessica	Jennings	Nature Commission	10/14/2024	<p>Page 40, it's really great to note that the vision and enablers have been amended to include reference to biodiversity and other environmental concerns beyond climate change.</p> <p>In relation to Policy 6.3 Increasing green infrastructure and biodiversity within the harbours (page 67). This policy should adhere to the environmental mitigation hierarchy, whereby impacts on the natural environment are avoided in the first instance, followed by minimisation and mitigation, and restoration etc. There is a paragraph (bottom left of the page) which states "The design of new development must consider how best to include tree planting and supporting a net gain in biodiversity in any proposals proportionate to the scale and type of development proposed." This should have reference to the avoidance of adverse impacts to the natural environment in the</p>	<p>The support of the Representation as regards inclusion, following the first public consultation exercise, of reference to biodiversity and other environmental concerns beyond climate change is acknowledged.</p> <p>This draft Local Planning Brief (LPB) looks comprehensively at a wide range of issues to facilitate coordinated planning and considers how different activities and uses can work together as well as considering their impacts. It is important that the LPB carefully balances economic, social and environmental needs and impacts. It is a function of the planning system to ensure that competing considerations and demands are appropriately and proportionately, balanced in reaching decisions on proposals for development. This includes balancing development proposals with other material planning considerations and impacts such as those on ecology and biodiversity.</p> <p>Section 1.6 sets out that the draft</p>

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					<p>first instance, so that 'biodiversity net gain' isn't just seen as the ability to damage existing ecology as long as in the end there is calculated to be a 'net gain'. I.e the preservation of existing ecology should also be a key factor in this policy. The focus of this policy shouldn't just be on the "provision and enhancement of public green space", but also the protection and enhancement of the coastal and marine spaces. Protecting what is there, both on land and in the marine environment, before then looking to enhance and increase provision. There should also be a focus on the use of native species, as this provides increased biodiversity benefits, noting that the green infrastructure photos shown on this page are not predominantly native species. I would also strongly recommend that anyone conducting an assessment of biodiversity value, including for net gain purposes, is suitably qualified and experienced, and that this is a requirement in this policy.</p> <p>Theme 6 on page 43 could emphasis the above by being amended to "...tackle the existing dominance of hardstanding, and</p>	<p>LPB has resilience as a core theme. Included in this section is environmental resilience and it highlights that, at the interface with the water, the HAAs have an important role to play in protecting as well as enhancing the natural and seminatural environment. This includes the coastal and marine spaces in the HAAs. It clarifies that the draft LPB will complement existing environmental strategies.</p> <p>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 and enhance the natural environment with the economic and social needs in the HAAs.</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. Whilst the focus of this Policy is on guiding developments to consider how best to include tree planting and support enhancement or a net gain in biodiversity in any proposals proportionate to the scale and type of development proposed, it is acknowledged that the draft LPB</p>

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					<p>help strengthen wildlife habitats, address biodiversity loss (including through the application of the environmental mitigation hierarchy), provide shelter, and..."</p> <p>Page 26, the summary of consultation, refers to the presence of seagrass beds to the north of St. Peter Port, but there are also seagrass beds within Havelet Bay.</p> <p>Page 69, Figure 7.2, Proposals Map B St. Sampsons Harbour, and in Scenario B1 on page 78 and Scenario B2 on page 80, I note the 'Indicative/ Potential Future Harbour Locations Option'. I appreciate that a decision has not been made regarding a future location of the port and that the LBP will not confirm a specific location for the future harbour. However, the indicative future harbour locations option shown in this figure is in the same area as seagrass bed habitat is located. It is noted in policy 1.2 on page 49 that "any proposals which limit the delivery or operation of a future harbour will not be acceptable". Based on this, any policy within the LPB which focuses the retaining of future</p>	<p>does not emphasise a need to avoid adverse impacts to the natural environment and preserve existing green infrastructure and biodiversity where possible. It should be noted that planning applications will be judged against best practice principles (which will include the environmental hierarchy as well as the Strategy for Nature that the Authority has adopted as Supplementary Planning Guidance).</p> <p>The Representation erroneously states that reference to seagrass is made on page 26 of the LPB. For clarification, this reference appears on page 38. It is recommended that the text is amended to include mention of the seagrass beds at Havelet, as follows:</p> <p>Priority habitats along the East Coast include Eel Grass beds, seagrass beds to the north of St Peter Port and to the south at Havelet.</p> <p>As the Representation acknowledges, 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 draft LPB would</p>

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					<p>harbour location options to include the area shown in the figure will increase the likelihood that a future harbour may be located in that area. I would like to highlight this as a conflict to the updated vision and objectives of the LPB submission draft, as well as to the objectives of the 2020 Strategy for Nature.</p> <p>Although the LPB is not directly making a decision on this matter, the outcomes of the LPB could ultimately direct the decision for the location of any future harbour.</p>	<p>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 should it be required. This is to ensure that the LPB maintains the flexibility for the States to consider new harbour development in the future if they decide to do so. It does not advocate any particular area for this purpose and will not direct a decision on a future harbour.</p> <p>The preparation of proposals for future harbour infrastructure is separate from the draft 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. The Development & Planning Authority supports adding wording to make clear that the draft LPB does not</p>

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						<p>negate the need for project level Environmental Impact Assessments or screening if required by The Land Planning and Development (Environmental Impact Assessment) Ordinance, 2007.</p> <p>Whilst it is noted that there may be a need for flexibility with regard to species of planting to adapt to the impacts of climate change in the future, as the draft LPB will provide a Policy framework for 10 years, it is considered that its focus on supporting native species is proportionate.</p>
ANON-ACRH-DBJ2-Z	John	Gollop	Living Streets and Independent Deputy	10/14/2024	<p>I support Resilient harbours and infrastructure but prefer relocation to east St. Peter port . I support job and leisure opportunities in marine sector island wide .</p> <p>We need big investment in harbour area .</p> <p>Emphasize theme 4 culture heritage tourism and leisure opportunities</p> <p>We need emphasis on disability access active travel healthy and ease of getting around</p> <p>6 we need climate resilience and improving natural environment.</p> <p>Both objectives I support for st Sampsons too</p> <p>We need affordable security and border resilience for police</p>	<p>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. The Development & Planning Authority note the support for the vast majority of Policies proposed in the draft LPB in this Representation.</p> <p>Resilience is emphasised as a core positive theme of the LPB, as set out</p>

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					<p>Immigration security</p> <p>I support greener ferries and emissions like at Fishbourne harbour Isle of Wight</p> <p>I am not opposed to sensible land reclamation.</p> <p>I support relocating the power station and reusing the ports and relocating fuel storage safely Supporting marine leisure industry .</p> <p>We need to enhance the waterfront for arts and leisure activities. Cinema, theatres arts . The outdoor facilities of Australia look attractive for regenerative activities.</p> <p>Sustainable travel is important. I prefer buses to be accessible in the south of town close to the old quarter bordage markets etc . We need more emphasis on public transportation, buses and cycles. I don't like the move of the bus station without shuttles and mitigation for shoppers residents etc</p> <p>We need walls for water sea protection that are robust but attractive aesthetics and an asset . We cannot sustain flood vulnerability.shoreham sea wall .</p>	<p>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>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 statutory activities, including security and border resilience, with the need for encouraging investment in appropriate locations within the HAAs. In preparing the draft LPB, the importance of enabling resilience of harbour operations, which includes statutory requirements, 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</p>

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					<p>I support 6 2 energy efficiency and hierarchy. W3 need more green areas infrastructure and biodiversity. Parklands.</p> <p>I support more housing across Town and St Sampsons harbour a mixture of aspirational free market part ownership and social housing together with cafes shops and community facilities. Provide ga e changing architecture utilizing underground technologies and mini tower blocks for views and space efficiency. Create living space for living streets.</p> <p>We need offices too that attract leople people to hubs . A new parliament building and public sector offices really should be situated near the town centers .</p> <p>We need public private investments to work a d attract money . A pool harbour option would be great to attract local and international yachtsmen</p>	<p>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>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 Hogue 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</p>

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						<p data-bbox="1688 150 2107 384">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 data-bbox="1688 437 2130 746">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 data-bbox="1688 799 2130 1463">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 in both HAAs 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 also supports the existing and future residential population in and around these areas. It has considered the need for commercial expansion within the HAAs and surrounding areas, the culture, visitor economy and tourism and accessibility and</p>

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						<p>appearance of Town and the Bridge.</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. LPB Policies 3.1 and 3.2 provides guidance for the provision of office based development.</p> <p>The preparation of the draft LPB has considered how existing and potential future activities within the HAAs would best fit together in</p>

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						<p>order to create areas with coordinated and clear uses which maximise the use of space. As set out in LPB Policy 3.3, the Development Zones in Town and at the Bridge will support the ongoing retail, restaurant, café and community focus of the HAAs taking into consideration a wide variety of uses including housing, commerce, tourism and leisure. 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 Main Centres.</p> <p>LPB Policy 6.3 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.</p>

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						<p>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).</p> <p>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 specifically seek to reduce the volume of parking in these areas.</p> <p>LPB Policy 3.2 seeks to achieve more efficient land uses in the HAAs, which may include consolidated and optimised car parking such that it better supports shops and businesses in Town. The intention of the draft LPB is to encourage proposals for development to</p>

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						<p>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>The LPB identifies areas in both HAAs where mobility hubs may be located. As highlighted in the representation from the Committee for the Environment & Infrastructure mobility hubs are designed to bring both public transport and active travel together in one space, with the concept being widely implemented in European and North American cities. Collectively placing these forms of transport in one location is known to make them more appealing to users. Mobility Hubs improve convenience, including providing the ability to change between bus routes more seamlessly or changing from a bus to a bike or foot for different parts of a journey. They are also known to improve safety for users, especially those who are more vulnerable. Providing one space for inclusive modes of transport also improves accessibility.</p> <p>LPB Policy 4.2 specifies that development in the HAAs must respect the heritage and setting of the harbours as well as their design</p>

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						<p>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.</p> <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</p>

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						<p>height of development in terms of impact on views and heritage.</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 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 high level 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.</p> <p>It should be noted that the delivery of development in accordance with the draft LPB need not necessarily</p>

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						<p>require public funding. In preparing the draft LPB, consultation was undertaken with potential developers, including the Guernsey Development Agency, in order to ensure that the draft LPB facilitates development which is achievable. It is not within the scope of the draft LPB to specify how development should come forward or who should be responsible for delivering development. However, the Policies proposed in the draft LPB have been prepared to encourage and facilitate private investment into the HAAs.</p>