

STATES OF JERSEY



DESIGN OF HOMES (S.R.15/2007): RESPONSE OF THE MINISTER FOR PLANNING AND ENVIRONMENT

Presented to the States on 3rd December 2007
by the Minister for Planning and Environment

STATES GREFFE

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INTRODUCTION

At the outset, I would like to congratulate the Environment Scrutiny Panel on producing a fine, well-written and well-illustrated report on a matter which should be of interest to everyone living in Jersey. We all of us have a right to expect decent, well-designed homes for ourselves, our children and future generations.

I know this publication represents the results of many hours of deliberation by a small dedicated group of Members and their advisers, to whom I would like to express my appreciation. I should also extend my thanks to those local residents and developers who provided evidence to the Panel.

The report addresses and examines some fundamentally important issues about housing design, and sets out good practice examples from the U.K. and from wider international experience, notably sites visited in London and Vienna, as well as from the Island. Though obviously not intended as a ‘housing blueprint’, I believe it can make a valuable contribution towards improving the quality and design of future housing in the Island, which has always been one of my prime objectives.

To this end, it is my intention to ensure that the report is used to inform and influence decision-making in relation to –

- the current Island Plan Review process and the relevant strategic planning policies;
- the emerging supplementary planning guidance on ‘The Design of New Homes’; and
- other relevant design guidance.

THE FINDINGS

The report is based around 2 separate themes which the authors regard as critical to the success of homebuilding – community and design, both of which I regard as important considerations. There are 21 recommendations covering a whole range of design issues on which I comment below:

Recommendation 1

Greenfield development should only be considered where the site is contiguous to an existing nucleated settlement and where the improvement of the neighbourhood amenities is an integral part of the development brief.

The location of new housing development to meet future demands is something which has to be addressed as part of the Island Plan Review process. This will involve revisiting the current ‘Spatial Strategy’. The Island Plan Review will, in turn, need to be informed by decisions arising from the forthcoming Population Review, which will provide a better understanding of the likely level of future housing demand and the pressures that are likely to be brought to bear on the Island’s precious land resources.

I am of the view that we should be aiming in the future to ensure that no new housing development should take place on greenfield sites unless this cannot be avoided and/or is essential to sustain rural communities. I remain hopeful that the town area will have the capacity to accommodate the bulk of future housing demand through Urban Regeneration and maximising opportunities at the Waterfront, and that other parts of the existing built-up area of the Island will continue to make a significant contribution.

I would acknowledge that, where housing development of greenfield areas is unavoidable, it makes perfect sense

to locate it close to an existing community where the development and future residents can benefit from, support and enhance existing community amenities, such as schools, shops and public transport.

The Island Plan review will be consulting on the methodology and strategy used to select locations for development, whether in the built up area, or if needed, outside it. A choice of broad options will be presented in a 'strategic options' consultation paper, which I have committed to publish early in the new year.

Recommendation 2

Distinct "village neighbourhoods" should be designated within the main built-up areas and a long-term development plan drawn up for each over the next 5 years. The development plans should seek to create sustainable nucleated communities through the provision of appropriate local amenities.

I am a firm believer in the concept of urban (and suburban) regeneration and the role it can play in making better places to live, work and play. I also recognise the advantages of properly analysing the characteristics of those areas which are to be developed and of formulating effective area renewal strategies (covering the sort of issues raised by the Panel), which can provide proper frameworks for developing and enhancing local communities/neighbourhoods. I acknowledge that, in this way, new housing can become part of community planning and properly integrated, rather than being more piecemeal and 'stand-alone' in nature.

Of course, some steps have already been made in this regard, notably with the recent publication of 'A Strategy for the Future Development and Regeneration of St. Helier', EDAW, 2007. However, I would accept that this only covers a small proportion of the existing built-up areas of the Island.

I accept that the concept of designating "village neighbourhoods" should be considered as part of the Island Plan Review process and will look to ensure that the concept of 'neighbourhood context' is introduced into the emerging supplementary planning guidance on 'The Design of New Homes'.

The previous approach has been to designate housing on a relatively small scale 'stitched in' to the existing urban fabric. This has meant it has been difficult to incorporate new social facilities in new housing development. It would be unlikely to be economic on a site, say, of 100 or so houses, unless there is an existing deficiency. The review of the Island Plan, and initially the Strategic Options Paper, will examine whether any of the broad locations have this potential. If they have, I strongly agree they should be more than just housing estates and every effort should be made to create real communities.

Recommendation 3

The Panel recommends that to avoid social polarisation, development schemes should, wherever possible, be mixed in tenure (including shared equity), income levels, family types and age-groups and incorporate good design to promote lifelong homes.

I acknowledge the social benefits of trying to create mixed and inclusive communities in larger housing developments with different types, sizes and tenures of housing. Apart from enriching the quality of community life, they can result in more attractive residential environments by providing for a variety of building forms and scales.

Historically, larger housing sites have been zoned specifically to meet identified housing need in the form of Category A housing, which has generally limited the resultant development to first-time buyer family houses and/or social rented homes of a size required by the Housing Department and based on identified need at that particular time. This has tended to restrict opportunities for social mix, although there are some notable exceptions. In this respect, I can understand why the Panel alludes to recent examples of sites zoned in the Island Plan 2002 being used for a single tenure as a type of 'social polarisation'. However, I agree with my colleague the Minister for Housing that the good management of States and Housing Trust properties has meant there is no evidence of social problems that can be attributed to the tenure of such developments.

It is also probably true to say that many of the larger market-led housing developments, arising as part of the

normal application process, have tended to have little regard to the notion of social mix.

In the circumstances, I believe there is merit in looking as to how the land use planning system might be used to encourage delivery of greater mix in terms of both affordability and dwelling type in new housing developments (e.g. through strategic planning policy, planning obligation agreements and other planning mechanisms). I will ensure that this issue be addressed as part of the Island Plan Review process and that it be given more prominence in the emerging supplementary policy guidance on 'The Design of New Homes', which might require a consequent revision once the revised Island Plan is agreed.

I note the Panel's reference to encouraging 'shared ownership'. This is a type of housing tenure that I am particularly keen to promote, to provide those on lower incomes with an opportunity to purchase a home that they could not otherwise hope to afford. In fact, as recently reported in the local media, the Minister for Housing and I are about to unveil a proposal to deliver shared equity type homes on development sites.

Recommendation 4

The Panel recommends that developers be encouraged to provide for ownership structures that allow the owners of residential properties to be able to own a share in the commercial elements forming part of the same building or development.

I believe there is much to be said for encouraging developments which combine residential uses with some commercial uses, allowing residents to live and work in the same neighbourhood, or development area, or, indeed, enabling them to "live on the job" in the same property.

In most towns throughout the U.K. and Europe there is a balance of homes, jobs and services. However, historically, it is probably fair to say that land use planning in Jersey and elsewhere has tended to place too much emphasis on zoning and segregating land uses. I am aware that the market has played its part, but all too often in the predominantly residential parts of St. Helier, redevelopment has led to the removal of small commercial enterprises. Some of this has been necessary to rid areas of 'bad neighbours' in the interests of public health and residential amenity, but this has by no means always been the case. In addition to providing jobs locally, such enterprises can often provide interest, vitality and a community focus and, in so doing, help create a 'sense of place'. It can be argued that this trend has, over the years, led to a certain sterilisation of residential areas around the town, which has been mirrored by the development of what might be described as 'suburban commuter estates' and the increasing concentration of industry and commerce into designated areas.

The review of the Island Plan provides an opportunity to reconsider this emphasis on 'neatly' segregating different land uses. There are many ways this might be achieved. However, in any event, I believe there is merit in encouraging developers of suitable housing sites to consider making provision for appropriate small-scale commercial activities/workspaces (e.g. retail outlets, craft and manufacturing workshops, art studios, offices, etc.), where these would not give rise to unacceptable pollution, noise or traffic generation, etc. That said, I am currently sceptical about the role of so called 'live work' developments. A number of major studies in the U.K. and America have shown that such developments have resulted in rising land values, which have forced out both small businesses and lead to lack of provision of affordable housing.

Recommendation 5

The Panel believes that all opportunities to engage the public and communities in the process of development should be taken. Software tools and 3-D modelling should be used whenever possible.

The Panel further recommends that parishes should take the lead in coordinating events to allow residents of a defined neighbourhood to participate in the planning or redevelopment of local areas.

The planning system in Jersey already makes considerable provision for public involvement/participation. Local public opinion has an important and statutory role to play in the formulation of the Island Plan and other land use plans (including the zoning of housing sites) and public views and representations are a material consideration in decision-making on planning applications.

I am a firm advocate of the democratic process in local government and whilst this might not be perfect in the planning system, recent changes have been made which have helped to ensure that public opinion has greater influence on the way that planning decisions are made.

I was interested to read the Panel's findings about the on-going development in the U.K. of a multi-user software tool which is aimed at allowing prospective residents, architects, developers and planning officers to collaborate on the construction of new homes. It is likely that such technology will become more commonplace in years to come.

I was also encouraged to read of the importance attached by the Panel to the use of scale models and 3D computer models, which is one of the main components of the 'Principles' I have laid down for the design of new buildings in Jersey. At present, scale models are required primarily for larger schemes and they have already proved worthwhile, not least because they make proposals so much clearer to the layman. However, I would accept that rapidly improving technology could make it possible to readily and cheaply produce models for many more schemes in the future.

I would have no objection to parishes taking a greater role in co-ordinating community involvement in area based plans for villages and neighbourhoods.

Recommendation 6

The Panel recommends that the planning department maintain its interest in good design and take further steps to promote high design principles amongst local architects and developers.

The Panel further recommends that the Department and Minister should keep themselves informed of developing design policies in other jurisdictions.

I have always promoted the importance of high quality design, and improvements in design have been at the top of my agenda since the commencement of my office. I was pleased to see, therefore, that the Panel has recognised the mechanisms that have already been put in place to ensure that good design is encouraged and is taken into account in preparing and processing development proposals (e.g. my Design Principles; the requirement for design statements; the work of the 'Design Review Group'; the appointment of a 'Department Architect'; the general restructuring of the planning system around 'good design'; and initiatives such as 'Architecture Week' and the 'Jersey Design Awards').

It is absolutely my intention to continue to promote good design among local architects and developers and to ensure that the planning department maintains its interest and continues to develop its skills and knowledge in this area.

Recommendation 7

The Panel recommends that the department sponsor the building of an eco-house to provide a showcase for sustainable techniques and materials for local builders and developers.

I would very much welcome the development of a prototype 'eco-house' in Jersey. There are numerous examples of such houses in the U.K. and elsewhere, some of which are highlighted in the Panel's report and in the emerging supplementary policy guidance on 'The Design of New Homes'. These show the 'art of the possible' in sustainable housing and are often exemplars of low-energy design and other sustainability initiatives.

Such a project would be invaluable in providing a real and tangible working example of innovative sustainability techniques, which can more readily demonstrate to local builders and developers what can be achieved. By doing so, it would help them face up to the challenges of producing more environmentally friendly homes and assist them in developing the necessary knowledge and skills. This will become increasingly important in the future as the planning requirements set by me and my successors in relation to sustainability become ever more demanding.

I will give careful consideration as to whether my department should take the lead in directly sponsoring the development of an 'eco-house'. However, this will obviously raise resource issues at a time of budgetary constraint. That said, given the heightened awareness of environmental issues in Jersey, it may well be that a private developer or local resident would be sufficiently motivated to come forward with such a proposal through the normal application process.

Recommendation 8

The Panel recommends that the Department investigate the introduction of the Code for Sustainable Homes to be applied to new residential developments.

I am keen to promote more environmentally conscious living and have been actively engaged in this since the launch of my ECO-ACTIVE initiative. As a natural extension to this initiative, I wish to encourage more sustainable forms of housing development (and other types of development), which is resource efficient and has less impact on the environment. As I have said previously "I think we are going to be moving as quickly as we can towards that".

The Panel has recognised the prominence already given to this matter in the emerging supplementary policy guidance on 'The Design of New Homes' and I believe there is scope to modify and refine the current document to reflect the Panel's findings, before it is finalised.

It is possible that the development of a 'Code for Sustainable Homes', perhaps going beyond current Building Byelaw requirements on energy efficiency, could help provide a useful way forward towards producing a step-change in sustainable home building practices locally. However, the Building Control department is already committed to matching the U.K. Building Regulations standards on energy efficiency. Currently, we are at the stage that the U.K. was at 2 years ago and we are moving towards setting energy targets for all new dwellings. The targets for next year are likely to be set to achieve a 20% reduction in carbon compared with dwellings being constructed today. However, this will depend on the response to a consultation document which is due to be published at the end of the year. It is the intention that the targets will be made progressively more demanding as we follow the U.K. lead and its aims to ensure that all new homes are 'carbon-neutral' in 10 years' time (N.B. incorporating eco-homes specifications as compulsory requirements). Interestingly, the U.K. approach allows off-site provision of low carbon energy. On the Island, this could include district heating such as from the proposed Energy from Waste Plant, or off-site energy from tidal sources. We should also understand that the import of French nuclear energy is a very low carbon source. I will, therefore, give this careful consideration in the light of the Island's unique energy position and the publication and implications of the draft energy strategy.

Recommendation 9

Building techniques which allow for easily reconfigurable spaces should be encouraged as an efficient way of providing true "lifetime homes" for people at all stages of their life.

The Panel further recommends that the Planning and Environment Department adopt the Lifetime Homes Standard for all new buildings as soon as is practicable.

I am fully supportive of well-planned homes which are robust in their design, so that they provide adequate accessibility and can be readily adapted to meet the changing needs and lifestyles of occupants over time. This issue is addressed in the emerging supplementary policy guidance on 'The Design of New Homes'. However, I would accept that there could be more emphasis given to encouraging designs where the structures are supported by external walls, to allow easy movement of internal walls and the refiguring of spaces.

I can confirm that Part 8 of the Building Byelaws was amended in July 2007 to embrace Part M of the U.K. Building Regulations and many of the 'Lifetime Homes Standards' (covering accessibility and adaptability), which were developed by the Joseph Rowntree Foundation. These are being applied to all new homes.

Recommendation 10

The Panel recommends that the ‘home zone’ approach adopted by many United Kingdom authorities should be supported locally.

I am generally supportive of the concept of ‘Home Zones’, which were pioneered in the Netherlands (woonerf) as a way of improving the local residential environments. The basic aim is to ‘reclaim’ local streets from continued domination by cars, for the benefit of everyone else who uses the street, in the interests of improved community living. This involves, for example, physical alterations to the roads, speed restrictions and a variety of other enhancement measures.

I would generally share the view of the Panel that there are many streets and developed areas that could, on the face of it, benefit from such an approach. However, it is clear that any such schemes would need careful planning and community involvement from the outset, if they are to be effective and potential community concerns are to be properly addressed.

I will ensure that the concept of ‘Home Zones’ is explored as part of the Island Plan Review, in consultation with the relevant stakeholders, including community groups and highway authorities. Principally, the enhancement measures involved in ‘Home Zones’ are self-enforcing through design. These principles can also be adopted more widely and not just in the quieter residential areas. For example, the principles of ‘design by negotiation’ adopted in the Netherlands and in Kensington and Chelsea have been applied also to busy roads and junctions.

Recommendation 11

The Panel recommends that prefabricated building techniques should be promoted, as these can reduce costs of building, particularly where labour costs are high.

I have no objection in principle to the more extensive use of timber-framed and prefabricated and modular building techniques, which can speed up the building process and reduce costs. However, this must not be at the expense of other important design objectives, which are set out in my published ‘Design Principles’, and the normal planning and technical considerations. There can be no compromise, for example, on the quality of the design and the need to demonstrate that new buildings have been designed to have regard to their context and to show some relevance to Jersey. My design principles certainly need not preclude modern methods of construction, and public procurement may be able to help develop a local industry, which can ensure that these principles are met. For example many of the most popular modular systems, such as the German ‘hof’ houses, have been modern adaptations of local vernacular traditions.

Recommendation 12

Given high quality design, modern and traditional building forms can complement each other and local architects and designers should be encouraged to draw on the best of modern design with minimal restriction.

My published design principles make it clear that, provided the emphasis is on quality, I would encourage modern architectural schemes, in addition to traditionally designed schemes and modern traditional themed schemes. However, I cannot commit to encouraging modern designs or any other forms of design with minimal restriction. My approach is to encourage quality appropriate to context, not to encourage any particular style or historicist approach. Any design concept, whether modern or otherwise, must be justified with a design statement and must have regard to normal planning and technical considerations. As I have already alluded to above, it is particularly important that new buildings designs should have regard to their context and reflect in their design their relevance to Jersey.

Recommendation 13

The Panel believes that developments in the built-up area should focus on improved design and increased amenity space whilst maintaining and, where appropriate, increasing, the level of density.

The Panel further recommends that alternative measures for density should be included in guidelines, in addition

to the standard definition of habitable rooms per acre.

The Panel further recommends that the current practice of regarding large rooms as two or more habitable rooms should be withdrawn.

There can be little doubt that land is one of the Island's most precious resources, and it is important that it is used economically and efficiently where it is earmarked for development or redevelopment, particularly if we are to prevent unnecessary incursions into green fields.

The idea of increasing densities of new housing developments through careful design is something I would endorse, provided it results in acceptable living standards. Indeed, this idea is already incorporated into the emerging supplementary policy guidance on 'The Design of New Homes'. In very basic terms, the most appropriate density for a particular housing site might best be determined by, the character of the area and its surroundings, the nature of the site, the nature of demand and the availability of services.

Density standards themselves are a crude planning tool which should only be used for broad general guidance and it is not my intention that they be rigidly and dogmatically applied to new housing schemes. In other jurisdictions, density standards have often been dropped as a means of design control, in favour of applying a 'design-led' approach to density, except to ensure a minimum efficient use of land. In this approach, the density is determined by a site's urban design context and potential. As the distinguished American planner Andreas Duany, architect of Seaside and inventor of the concept of 'design codes' has written... 'density follows'.

Currently, the widely used method for expressing density is 'habitable rooms per acre' and this gives a reasonable understanding of the density of accommodation for a particular housing layout for comparative purposes and for broad estimates of housing yield. I would acknowledge that there might be other measures of density which could be considered for measuring the density of a town, a neighbourhood, or housing site. In the circumstances, I will ensure that potential alternative density measures are reviewed in association with on-going work on the emerging supplementary policy guidance covering 'The Design of New Homes'.

Recommendation 14

The Panel recommends that landscaping plans should be fully integrated into the main building development, not just seen as an "add-on" and that the planting of mature and semi-mature trees should be encouraged.

I attach particular importance to good landscape design in residential developments and would endorse the Panel view that this should be an integral part of the overall design process rather than an afterthought. Indeed, this is the approach adopted in the emerging supplementary policy guidance on 'The Design of New Homes'. Ideally, broad structural landscaping principles should be incorporated in design statements.

Recommendation 15

The Panel recommends that all developments consider the use of porous membranes and other design features to reduce the amount of excess water entering the drainage system.

Development by its very nature increases water run-off and decreases infiltration into the ground. However, the Panel has drawn attention to some good ideas on ways to manage rainwater and reduce surface water run-off from new developments (including porous membranes). These measures are generally known as 'sustainable urban drainage systems'. I recognise that the effects of development can be ameliorated by designing external surface and drainage on housing sites to increase filtration and natural recharge of underground aquifers (through, for example, more use of absorbent external surfaces, channelling water over absorbent land, use of soakaways, etc.). I will ensure that this important issue be addressed as part of the emerging supplementary policy guidance on 'The Design of New Homes'.

Recommendation 16

The Panel recommends that all new developments should seriously consider providing parking at basement or

semi basement level or under a pedestrian platform.

The Panel further recommends that the requirement for parking attached to a unit of accommodation should be further relaxed to provide for increased living space and amenity space and that this change of emphasis should be linked to improved public transport links and services.

The provision of adequate and convenient car parking space is normally critical to the success and quality of new housing developments, and the level of parking required will generally depend on the location.

As identified in the current Island Plan, there is a need to review published standards, which are quite demanding. They were devised when the Island was promoting a 'car accommodation strategy' and, it could be argued, contribute to encouraging car dependency. For this reason, the emerging supplementary policy guidance on 'The Design of New Homes' looks to reduce parking requirements. However, the ongoing Island Plan review is looking at revising parking standards more broadly for all land uses, and the evidence for this will need to withstand scrutiny by an independent inspector at an 'examination in public'. In order to do this, and so that the different parking scenarios can be tested using the Island traffic model, I am proposing that this issue be consulted on through the Island Plan Review 'strategic options paper', rather than supplementary planning guidance. Parking provision and density control are matters of policy rather than guidance and so are better pursued within this approach.

However, the Panel is seeking a change in the approach taken to how parking provision is made and wishes to encourage underground/basement parking and peripheral parking to create more pleasant car-free residential environments and encourage a greater sense of community. I have some sympathy for this approach and will ensure that the Island Plan Review looks into the waste management implications of introducing a policy which once again seeks to promote the provision of underground car parks. It will also be necessary to take account of expense involved with such developments and the high service charges that might suppress provision of affordable housing.

I will also seek to ensure that, in addressing the location of parking spaces, the emerging supplementary policy guidance on 'The Design of New Homes' places greater emphasis on creating pleasant environments for residents which are not dominated by cars.

In any event, parking guidelines are, just as the name suggests, guidelines, and will need to be exercised with a degree of flexibility. The parking provision in proposed developments will continue to be considered on its merits and there will always be instances where a lesser number of spaces is deemed acceptable, for example, in restricted urban sites where they are well connected to good pedestrian and/or cycle networks; where public transport links or services are readily available; or, perhaps, where 'car clubs' are proposed as an integral part of a scheme.

Recommendation 17

The Panel recommends that the Department promote the use of green roofs in appropriate developments and that, in general, flat roofs should be seen as a positive design feature, providing amenity space in the form of roof gardens or terraces for residents.

In common with the Panel, I recognise the advantages of 'green roof' technologies, which are now very well established in Europe, and I was interested to see the examples cited in its report. This issue has been addressed in the emerging supplementary policy guidance on 'The Design of New Homes', but I consider that it should be now be given greater prominence, before the document is finalised.

Recommendation 18

The Panel recommends that an increasing use of glass should be encouraged in residential designs.

I would acknowledge the potential value of using more glass in the design of homes, not least in optimising light penetration, improving internal spaces, exploiting solar gain and offering improved outlooks.

However, it is also important to recognise that window design must be considered along with the design of all the other building elements (e.g. doors, roofs, lighting, rainwater goods, etc.) to create a coherent overall design that must, in turn, have regard to context. Furthermore, in designing windows there will be other considerations to take into account (e.g. sound insulation, privacy, health and safety, excessive heat gain, heat loss, greater risk of burglary), which may require considerable expertise to resolve.

There will be different design solutions to suit individual circumstances and I do not think it appropriate to encourage increased use of glass per se in residential designs, without heavy qualification. On some sites, too much use of glass could create overheating in summer, requiring the high carbon solution of mechanical air conditioning and excessive cooling in winter, also requiring a high carbon solution of space heating.

Recommendation 19

The Panel recommends that where residential developments are built to minimum size standards, the department should impose high design standards on the overall development and ensure that a generous amount of amenity space is provided throughout the development.

The Panel also recommends that developers be encouraged to emphasize volume within a development by increasing ceiling heights and providing double-height rooms in developments, wherever appropriate.

Floorspace standards are necessary to counter market forces in Jersey and serve to provide a 'backstop', which aims to ensure at least a reasonable amount of floorspace is provided in all new homes. Since taking office and in the interests of improving the quality of residential environments, I have sought to promote the development of larger, more spacious homes which exceed the minimum internal space standards and better reflect changing lifestyles and demands for space. I note that the Panel is supportive of a 10% increase in living space over published minimum standards and would be happy to support this as an amendment to the 5% increase currently proposed in the emerging supplementary policy guidance on 'The Design of New Homes'. Required minimum sized floor areas for different uses within new dwellings can also be increased accordingly.

I also believe that, as a general principle, there is merit in requiring a generous provision of amenity space throughout housing developments where there are no overriding constraints. Amenity standards, though, are problematic and are only practically achievable for development of two-storey houses with gardens. The rigid application of amenity space standards internationally has led to poorly designed 'left-over' pieces of land, which are easily vandalised and hard to maintain. Very often they have been observed in the breach. There has been a trend to replace amenity space standards internationally with more 'design-led' approaches relative to a site's density and context. For example, on some high density schemes provision of generous balconies might be more appropriate. In other schemes, play streets or communal courtyards might be more appropriate. What matters is that all residents have access to a high quality amenity area as a matter of policy; that the appropriate design solution is chosen for a site; and that provision is generously made and easy to maintain.

With regard to the Panel's second point, I recognise the potential advantages of increasing ceiling heights in new developments and, where appropriate, providing double-height rooms. This can enrich the quality of the internal living space and create a more generous and spacious 'light and airy' feel. They are, however, less energy efficient and more difficult to heat. I will ask that the matter be addressed in reviewing the emerging supplementary policy guidance on 'The Design of New Homes'.

Recommendation 20

The Panel recommends that the Department should encourage developments to include some open-plan living units and accommodation shells.

I am favourably disposed to the idea of open-plan design in new homes and I recognise the advantages they have over conventional 'cellular' layouts in term of optimising the use of interior space and providing more flexibility to meet the changing living requirements of occupants. I would be happy, therefore, to give more emphasis to these advantages in the emerging supplementary policy guidance on 'The Design of New Homes'. Ultimately,

however, whether a house-buyer prefers open-plan or conventional internal layouts is a matter of consumer choice.

Recommendation 21

The Panel recommends that the use of sliding doors should be encouraged in the design of small residential units.

I would be happy to highlight the space-saving advantages of sliding doors built into walls, in the emerging supplementary policy guidance on 'The Design of New Homes'. Ultimately, however, whether a house-buyer prefers doors of one type or another is a matter of consumer choice. In certain circumstances sliding doors may not be permitted because of means of escape/fire protection issues, particularly in flatted/communal dwellings.

CONCLUSIONS

It can be seen from the above that I am favourably disposed to much of what the Panel has included in its report and findings. However, given the nature and complexities of the issues surrounding the design of new homes, it is not always possible to give black and white responses to the Panel's recommendations.

I hope that the comments I have set out above are self-explanatory. Clearly, these comments include a number of commitments, notably requiring action by those engaged in carrying out the review of the Island Plan and of the emerging supplementary planning guidance on 'The Design of New Homes'.

As a consequence, I will prepare an 'Action Plan' to ensure these commitments are properly addressed.