

STATES OF JERSEY



ASSESSMENT OF VISUAL IMPACT IN GREEN BACKDROP ZONE PLANNING APPLICATIONS (P.31/2026): COMMENTS

Presented to the States on 5th March 2026
by the Minister for the Environment

STATES GREFFE

COMMENTS

Summary

The objectives of the Deputy's proposition, as amended, can be achieved without implementing the full scope of the proposed measures.

Part (a) is considered to be acceptable, but only where it is applied proportionately.

Visual impact assessments should be required for applications within the Green backdrop zone, only where proportionate, taking account of factors such as building height, location on the escarpment and potential impacts on landmarks and the skyline.

This targeted approach ensures that assessments are provided only for developments with material effects on the Green backdrop zone, reducing unnecessary burdens and supporting the Government's ambition for a less onerous planning system.

This can be achieved by a revision of the advice issued by the Planning applications team to prospective applicants.

Parts (b) and (c) are not supported, and Members are urged not to support them.

Existing supplementary planning guidance already provides the necessary framework for assessing the visual impact of development on skylines and views: further guidance is not required and unjustified.

Creating new prescriptive mapping of sight lines and viewpoints, captured pictorially, would quickly become outdated and represents an inefficient use of professional resources.

Developers should instead continue to provide site-specific impact assessments, with planning officers ensuring appropriate rigour. This can be managed within existing resources.

Overall, my proposed approach enables robust application of island plan Policy GD8 and GD9, whilst maintaining a proportionate, efficient and resource sensitive planning process.

Comment

This proposition is in three parts.

- Part (a) requires that any planning application within the Green backdrop zone (GBZ)¹, where they are likely to have a visible impact, must include both written and visual assessments of its impact to support and enable the use of bridging Island Policy GD9²; and
- Parts (b) and (c) request that the Minister publish new supplementary guidance, by the end of 2026, that pictorially identifies the key features requiring protection and provides mapped sight lines and photographs from relevant viewpoints to support a consistent approach to assessing visual impacts in the GBZ. Part (c) also suggest the provision of additional resources to support the application of policy.

My response to this proposition addresses each part in turn.

Part (a)

It is proposed that Part (a) can be accepted, but only where the requirements for visual impact assessments will be required to be provided, by applicants, in a proportionate manner, having regard to factors such as the height of the proposal, its position on the escarpment, its relationship to key features and its potential impact on the skyline.

This approach would ensure an appropriate balance between securing the information needed to assess visual impact and avoiding undue or unreasonable burdens on applicants. This is consistent with my stated policy objective to deliver a planning system that is less onerous.

Not all development proposals within or affecting the Green backdrop zone (GBZ) will warrant a detailed or technical assessment and to request all applicants to provide one, even where their development proposals will have no material visual impact, is disproportionate and unjustified.

The requirement for relevant applications to include written and visual assessments in accordance with Policy GD9, where it is proportionate and justified to do so, can be delivered effectively through the ongoing review of the validation checklist³ by the Planning applications team. Incorporating a GD9-specific requirement into this review will ensure that applications provide:

- a written assessment demonstrating how the proposal accords with Policy GD9; and
- appropriate visual material - such as photographs, verified images or photomontages - from suitable viewpoints.

¹ The Green backdrop zone (GBZ) is a planning designation within bridging Island Plan 2022–2025. It refers to areas of landscaped escarpment around the east, south and west of the island that are contained within the defined built-up area and which form a prominent green backdrop to St Helier, St Aubin, Gorey and St Brelade's Bay (see plan at appendix 1). These areas are visually sensitive because they shape the skyline and the setting of these coastal settlements.

² Bridging Island Plan Policy GD9: Skyline, views and vistas sets out how development must mitigate and manage its impact on the skyline, strategic views, important vistas, and the setting of listed buildings, places and key landmark buildings. Whilst Policy GD9 applies island-wide, its requirements are particularly important in the GBZ because the Island Plan identifies these escarpment areas as forming the green backdrop and setting of places such as St Helier, St Aubin, Gorey and St Brelade's Bay.

³ The Planning [validation checklist](#), which is managed and published by the I&E Planning application team, tells applicants exactly what documents and information must be submitted before a planning application can be accepted. It lists the required forms, plans, drawings and supporting reports for different types of applications, and ensures that planning officers receive all the information they need upfront to assess proposals properly and consistently.

By embedding proportionate triggers (such as the height, scale and mass of the proposed development; its position on the escarpment and relative to key features and potential skyline impact) into the checklist, planning officers will have a consistent and flexible mechanism to request the level of visual assessment appropriate to each case.

Parts (b) and (c)

I urge Members to reject these parts of the amended proposition. The publication of new supplementary planning guidance (SPG) by the end of 2026, including mapped sight lines and photographic catalogues throughout the Green backdrop zone, as proposed in part (b) and (c) of the Deputy's amended proposition, is considered neither necessary or justifiable. This is because:

- my existing [Landscape and seascape character supplementary planning guidance](#) already provides structured advice on assessing views, visibility and landscape impact.

This SPG, which was published in July 2023, already gives general landscape design guidance on accommodating new development, reinforcing rural character, and considering views and visibility.

Section 5 of the guidance already provides specific advice on how to consider views and visibility when assessing proposed development, which includes guidance on selecting appropriate viewpoints and understanding how development interacts with skylines, key landmarks and the wider landscape.

The guidance highlights the need to protect key landmarks, such as Corbière, Elizabeth Castle and Mont Orgueil, but is generic in its form and use and can be applied to the assessment of visual impact on any other view, vista, key landmark or skyline throughout the island, including those within the GBZ.

- prescriptive sightline mapping risks becoming outdated quickly due to vegetation growth, alterations to routes and access and a changing built environment, all of which can affect views. A flexible, site specific assessment, undertaken by developers in relation to specific development proposals, is more reliable and adaptable.
- the Deputy's proposition references London's view management framework as a comparative example; however, the two contexts differ significantly. London is a large, urban environment with long-established formally defined view corridors and the substantial technical and institutional capacity needed to define, manage and protect them - conditions that are not directly transferable to Jersey.
- producing additional supplementary planning guidance to generate comprehensive sight-line maps and photographs of those features requiring protection would require extensive GIS analysis, fieldwork, drafting, consultation and regular updating: this is considered to be a duplication of effort for limited practical benefit.

It would also divert limited professional resources from other work already endorsed by this Assembly, including the generation of new and revision of existing supplementary guidance (including work to assess the potential introduction of a development levy⁴; the review of residential parking

⁴ [States Assembly | P.70/2025 Amd.Com.](#)

standards⁵; and the framework for an ageing society⁶), along with preparations for the next island plan review.

Given existing resource pressures, replicating what existing guidance already enables is not considered to be a good use of limited officer time or public funds.

Developers are best placed to produce visual assessments tailored to the specific context of each site, consistent with established practice across other technical areas that are required to be addressed as part of the preparation and submission of a planning application. The form of these visual impact assessments – to be supported by photographs, verified images or photomontages - from suitable viewpoints, can be assessed and assured on a case-by-case basis, and be proportionate and appropriate to the nature and scale of the proposal.

It is also considered appropriate and proportionate that those seeking the benefit of development i.e. the applicant, fund the technical work needed to assess its impact, as is required for other aspects of the development process (such as the impact on heritage assets or ecological sites).

Planning officers, through the validation and assessment process, retain full authority to challenge inadequate submissions, request additional visual impact analysis and ensure robust application of Policy GD9 and the existing Landscape and seascape character planning guidance. This is already part of the work that planning officers undertake in the assessment of development proposals and the application of policy: additional resources are not, therefore, required.

Conclusion

In summary, it is considered that the aims of the Deputy's proposition can be met without adopting the full approach proposed.

Part (a) is acceptable, but only where visual impact assessments are required on a proportionate basis, based on factors such as height, escarpment position, relationship to landmarks and potential skyline effects. This ensures that only those proposals with a material visual impact upon the Green backdrop zone must be accompanied by detailed assessments, avoiding unnecessary burdens and aligning with the goal of a less onerous planning system.

Parts (b) and (c) are not supported, and Members are urged to reject them. Existing Landscape and seascape character supplementary planning guidance already provides the tools needed to assess views and visibility, whilst highly prescriptive mapping would become outdated quickly. Developers are best placed, and ought to be required, to provide site specific assessments setting out the impact of their development proposals, with officers ensuring rigour through the planning application validation and assessment process.

This approach delivers robust application of Policy GD9 whilst maintaining a proportionate and efficient planning system.

New supplementary planning guidance mapping sight lines and cataloguing viewpoints and landscape features pictorially is, therefore, unnecessary and is also considered to represent an unjustified use of limited professional resource, relative to other priorities.

⁵ [States Assembly | P.54/2025](#)

⁶ [States Assembly | P.50/2025](#)

APPENDIX 1

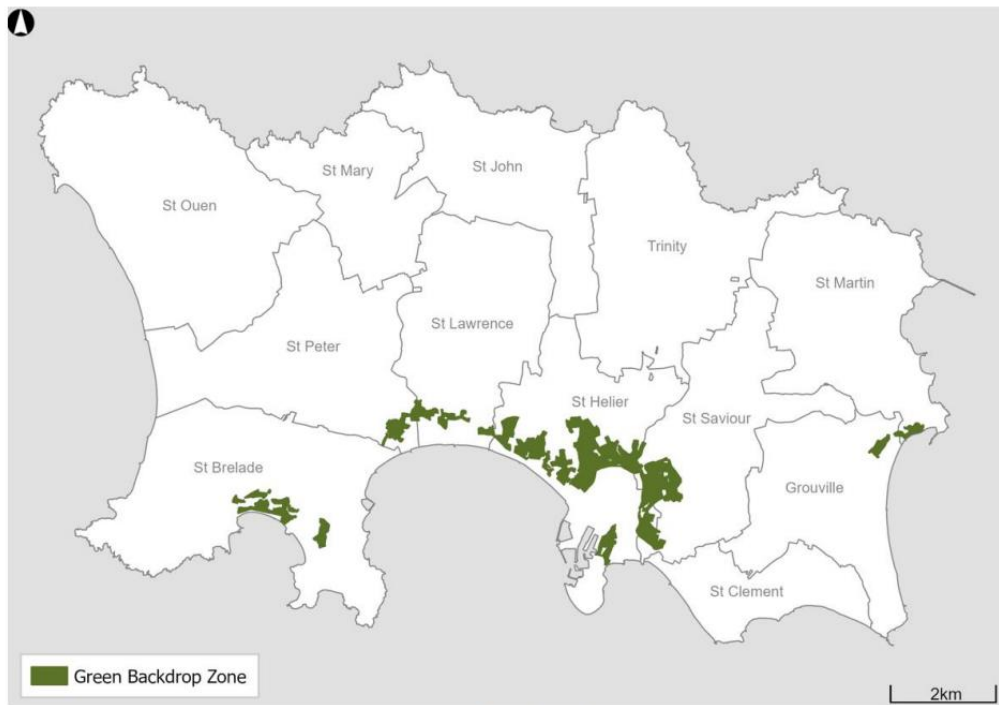


Figure GD3 – Green backdrop zone