

## Application Comment

Reference: P/2017/1023

### Comment Date

16 August 2017 16:44:13

### Comment Author

First Name: Paul

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### Comment

[Redacted] we strongly object to this proposed further development.

This application should be rejected as it:-

- does not comply with the Island Plan as it is part of an application to develop 33 buildings on agricultural land, with some land only returned to open field as it is required by codicil
- does not provide adequate parking facilities for potential peak usage and invades privacy
- creates a driving hazard on La Rue de la Frontiere
- does not provide realistic proposals for public transport access and thereby would increase private vehicle traffic.

Tamba Ltd and JAJ Properties Ltd have submitted many applications since acquiring the Tamba Park and Retreat farm sites. The public have raised strong objections to the previous objections. Each time another application comes along it is a major undertaking for the public to review all the documents and raise the most pertinent objections. This application has been published when many people are on holiday and may not be aware or able to object. P/2017/0519 was refused by the Planning Committee as they did not want to approve the total proposed developments as piecemeal projects. As these are recognised to be part of one large development, the objections raised to each application should be applied across the whole development.

P/2016/0503 was submitted as a retrospective application, even though the developer should have known planning approval was required. This was approved at a stage when the true extent of the developer's plans for the whole site was not apparent. The subsequent applications have started to reveal the developer's true intent, which is shown to be to change the use of the land from agricultural to development and then develop residential units on the site.

#### Island Plan and Change of Use of Agricultural Land

This application needs to be considered specifically along with the applicant's other submissions P/2017/0519 and P/2017/0805. The combined applications are to develop 29 housing units and 4 ancillary buildings on the site with only approximately one third of the land (field L78) returned to open agricultural field (which is required by a codicil anyway).

- P/2017/0519 - In a letter dated 7th June 2017 the Department of the Environment, Environmental Land Control objected to this application and they clearly stated that the land is agricultural and the land is not being used "for an agricultural requirement"
- P/2017/0805 - Field L78 has a codicil on it that requires field L78 to be returned to agriculture should the greenhouse be demolished, which the developer has recognised
- P/2017/1023 - The application clearly states they are looking to change the use of Field 770 from agricultural field to car park and, by inference, housing

Therefore, this boils down to part of an application to build 29 homes and 4 ancillary buildings on agricultural land, with no additional return of land to open field. The approval of further development on this large and significant site would set a dangerous precedent for all other greenhouses on the island, many of which are far more dilapidated than these greenhouses.

Housing development has previously been completed on the combined site. The profits from these developments should have been used to return the greenhouses to open agricultural fields. The approval of further housing over and above this initial amount should then be considered on the basis of whether housing development should be approved on an open agricultural field in the given location. If such additional housing development on open agricultural fields is approved, then this opens the gates for applications to develop housing on any other open agricultural field across the island.

Alternatively, instead of creating open, agricultural green fields the applicant could be pro-actively working with agriculturalists to find a use for the greenhouses. The land was acquired with full knowledge it was classified as agricultural. The developer's marketing material states the greenhouses are 'in general in excellent condition'. Various alternative crops are being licensed or investigated (hemp, cannabis for medicinal purposes, honeyberries and tea), which could suit these greenhouses. This could be the solution, if the applicant is realistic about the level of rent that can be charged.

Various conditions and laws relating to the site seemed to have breached in the past (for instance noise levels, use of agricultural land for non-agricultural purposes, erection of an unapproved marquee, operation of machinery out of hours, disposal of commercial waste and changing the flow of the stream). This raises concern over whether the developer will comply with any future conditions that may be applied to any approved development.

#### Construct 27 housing units and 4 ancillary buildings

The units are indicated to be mobile or non-permanent, meaning they can be moved as required. Therefore, the proposal is effectively to create what would seem to be Jersey's first caravan park. If this proposal is approved, then this does cause concern that the mobile homes would not be put on site or rapidly removed with the developer looking to benefit from the change of use to develop more substantial, permanent residential homes.

The proposal looks to develop two reception areas, shop and games room/gym which represents an urbanisation of the area. There is a risk that the developer promotes these facilities (particularly the shop) to passing trade to increase footfall and profits.

In the very worst case scenario where approval is granted for development of the site, there should be a codicil that would require the land to be returned to open field agricultural use if the use for the self-catering units is not continued for any reason.

The similar site at Les Ormes does many short-term lets to non-holiday makers. If approved, what restrictions would be imposed on use of these properties and how would compliance be checked? Use for short-term lets would create significantly different usage for the site.

#### Develop car park

Car parking has been proposed with a total of 228 spaces. This looks likely to be inadequate at peak usage.

Tamba Park staff peak at 20 in the summer months. The staff for the self-catering units is not clear, but the Economic Statement indicates 3-5 FTE's at non-peak with the number potentially more than doubling at peak. Therefore, staff parking is likely to require all the 33 spaces indicated.

The calculation of Tamba Park visitor parking accumulation assumes occupancy of 3 per vehicle, giving a peak of 123 cars. If the occupancy assumption is wrong and it is actually say 2.5 per vehicle then the peak would be 148.

An allowance of 27 spaces has been given per self-catering lodge, giving 1 space per lodge. This may be appropriate for holiday makers, but would not be suitable if the lodges were

rented as short term lets to non-holiday makers where the spaces required are likely to equal the number of bedrooms rented, that is 68 spaces.

Therefore, space looks tight/insufficient with potential need for 249 spaces (33 staff, 148 Tamba Park visitors and 68 spaces for lodges).

No allowance has been made for exceptional events, where Tamba Park tries to bring in large numbers of visitors.

Deliveries/servicing are proposed out of operational hours. Operational hours for visitors are 10:00 – 19:00. The conditions on the retrospective approval for Tamba Park included that 'No machinery shall be operated, no process shall be carried out and no deliveries taken at or despatched from the site outside the following times 08.00 to 18.00 weekdays and 08:00 to 13.00 Saturdays, not at any time on Sundays, Bank and Public Holidays'. Therefore, in reality deliveries/servicing are most likely to also occur during operational hours.

Finally, the lodges' & overflow car parks overlook our property. This area was previously used for staff parking. Creating a large car park for visitors would represent a massive loss of privacy for our property.

Widen vehicular access to La Rue de la Frontiere

This entrance has already been widened previously. However, it is indicated that it still would be insufficient for large vehicles to pass each other. Further widening would create an excessively long opening onto a narrow road on a blind corner.

The applicant's own Transport Assessment indicates that 15% of cars are travelling along La Rue de la Frontiere in the vicinity of the site at speeds in excess of 28.4 mph in a Northbound direction and 31.3mph in a southbound direction. These incredibly high speeds are despite the 'constrained highway geometry in rural St Mary's'. Not surprisingly, the report holds back from providing the full range of speeds that these 15% of cars were actually travelling at.

It has been frequently witnessed that Park visitors exit the current car park onto La Rue Des Varvots without looking for oncoming traffic. Fortunately, most oncoming cars have been going slow enough to avoid an accident (the applicant's Transport Assessment indicates an average speed on this road of about 8 mph). This would not be the case on Rue de la Frontiere.

Construct bus shelter, form footpath, create pedestrian refuge & create road crossing on La Rue De La Frontiere

Construction of the bus shelter and forming a footpath will require the removal of mature trees and existing earth banks, which will impact on protected species and cause a

detrimental change to the landscape.

It is also proposed to create a pedestrian refuge for passengers embarking/d disembarking northbound buses and a road crossing.

This stretch of road is too narrow. The proposed increase of the width of the road (extra 1.5m) is taken up by the creation of the proposed pedestrian refuge (1.5m wide). The width of the road along this area is generally approximately 4.7m wide with a widening towards the corner to approximately 5.4m wide. The sides of the road are steeply banked, with tree trunks and stumps right on the side of the bank aligned with the road edge. The buses on this route are 2.34m wide and 10m long. Therefore, buses (and other large vehicles) already cannot pass on this stretch of road. This would continue to be the case with this proposal. Crossing the road from the pedestrian refuge would be extremely dangerous. Passengers would disembark at the front of the bus onto the pedestrian refuge, hence meaning they would be closest to the tight bend in the road. The crossing has been proposed at the other end of the pedestrian refuge, but many passengers will disembark then cross the road at the point they disembark. The likely passenger profile would be young families.

Buses stopped at either proposed bus stop would create a severe hazard as they would be on a blind corner. Southbound drivers may not see the stopped bus until they are only about 20m away. The stopping distance at 30mph is 23m, at 40mph it is 36m.

Changes to the road infrastructure would be extremely disruptive, but would only be for the benefit of Tamba Park and its visitors rather than the local community.

These proposals are not realistic and hence visitors will not have the option of public transport and will need to use private transport.

There are many issues, but principally this application (and the previous two from this applicant) does not comply with the Island Plan and hence should be rejected without further consideration. The Island Plan should not be over-riden due to one applicant's desire to develop on agricultural land.

Finally, the public have been massively inconvenienced by having to comment on this developer's piecemeal applications (the last three were all between 25th April 2017 and 1st August 2017) which do not comply with the Island Plan. If the public do not repeatedly object then this is portrayed by the developer as support. In the Planning Statement regarding the Public Exhibition it is stated that 'Approximately 20 residents attended and all seemed to be content with the proposals', whereas in fact many attendees were holding back on their objections pending submission of this application. The constant barrage of applications needs to be stopped.

## Application Comment

Reference: P/2017/1023

### Comment Date

18 August 2017 07:51:24

### Comment Author

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### Comment

17 August 2017

Dear Sir,

JAJ Properties Ltd, La Rue de la Frontiere, St. Mary, JE3 3EG – P/2017/1023

 I am writing to strongly object to the latest planning application to the building of 27 self-catering units, various ancillary structures, the widening of the entrance, car park and bus stop within a designated green zone.

There can be no doubt that this application contravenes Policy NE7, which sets out a high level of protection from all forms of development in the Green Zone. This application represents a major development that proposes to demolish the greenhouses and "change of use of resulting agricultural field to car park...". So, despite Mr P Straddon's Inspectors Report, which declares that greenhouses are legally temporary and once their use is over the land will return to agricultural use. The applicant, knowing at the time of purchasing Retreat Farm that the land is classified as agriculture, is ignoring this and instead proposing to concrete over the "resulting agricultural field"!

The policy further states there are several development types that will not be permitted; this

includes new dwellings as well as the redevelopment of glasshouses, as in the case of the application submitted above.

If this application is approved, where will this all end? Deputy Luce recently pointed out in the JEP (27th June 2017); he is "envious of Guemsey's planning policy of not allowing abandoned greenhouse sites to be turned into housing". Deputy Luce also mentions that permitting planning applications to convert greenhouses "into residential developments in some cases would discourage other Islanders with redundant greenhouses from returning them to agricultural land".

The application talks about this development improving the local environment by the removal of the glasshouses. If the applicant were to return the land to agricultural use, as Mr P Straddon's report asserts, this would indeed be the case; but that is not the situation here. This application, if approved, would result in the urbanisation of the area, which will not only be seriously detrimental to the area but will also set a dangerous precedent for all other glasshouses in the island.

Is this the start of the gradual urbanisation and destruction of the countryside as we know it today? If so, shame on us for destroying the character and nature of the beautiful countryside that islanders and tourist so enjoy and which Policy NE3 seeks to protect for future generations.

In the Economic Statement produced for Ruff Ventures on 30th June 2017, it refers to Policy NE7, 10. Section b of this policy states development for another use is subject to "demonstrable environmental gains, contributing to the repair and restoration of landscape and use". If by this they mean subjecting his neighbours to increased light and noise pollution that will without doubt be the case, then they clearly do not have any understanding of what it means to live in the countryside. The application gives a great deal of emphasis on the lighting required to ensure the security of the site. This effectively means that [REDACTED] neighbours might as well be living in town with the delights of street lighting. The whole point of living in the countryside is to enjoy the natural surroundings and at night this means the dark. Having artificial light being forced upon you does not "contribute to the repair and restoration of landscape". In addition, with the attraction of tourists it will result in an increased "occupation and use" and noise, not reduce it.

The application continuously refers to the site as 'industrial', 'brownfield' or 'quasi-industrial' to give the impression that the glasshouses do not sit on an agricultural site. This notion is destroyed by their own application which refers to the "change of use of resulting agricultural field". It appears to be a cheap attempt by the various parties involved to convince people that the site is classified as something that it is not.

Policy E1 in the Economic Statement further supports the notion of the urbanisation of the area.

- Section 5 refers to "Support the provisions of shopping and services within local centres"
- Section 6 to "Ensure that new commercial, retail and industrial developments take place in locations which are accessible, avoid physical constraints and minimise the impact on the environment".

The proposed construction of 27 holiday rentals, shops, reception, gym, laundrette and car park on the largest glasshouse site on the island, clearly indicates that this does not have a low impact on the area, and the policy itself talks about retail and commercial development, which is more akin to a development in a town or city. As such, it does not represent an improvement to the local environment.

The Economic Statement puts a great deal of emphasis on Policy SP5, which supports the diversification of the economy. However, in so doing they are ignoring the fact that the land is classified as agricultural and is therefore afforded a great deal of protection from development away from this. It doesn't mean that they can take agricultural land and develop it for tourism. The expectation is that once glasshouses become redundant / derelict there is a presumption against other use.

With the States keen to encourage our farmers to grow alternative crops, the glasshouses provide ready-made facilities to support diversification in agriculture. There have been several articles in the JEP in recent times on alternative crops (hemp, cannabis for medicinal purposes, honeyberries and tea), being investigated or licenced.

Surely this presents [REDACTED] with an ideal opportunity to go into business with farmers and owners of glasshouses, to diversify agricultural production and take advantage of the purpose-built greenhouses across the island to produce economically viable alternative crops. The most recent article (17th August), reports that the trials are going well and this will lead to the production of a commercial crop "to diversify and broaden the rural economy".

With [REDACTED] entrepreneurial nous and the farmers knowledge and experience of the land and local conditions, it presents a unique opportunity for the island to be at the forefront of this new industry and thereby reduce the islands reliance on the finance sector. All of which supports Policy SP5.

The Marketing Strategy Method Statement produced for [REDACTED] confirms that overall the glasshouses are in a good condition, so if the intention is to maintain and diversify the economy (SP5), what better way than to utilise these glasshouses that are "in general in excellent condition" for these alternative crops.

The Economic Statement mentions Policy ERE7, but fails to point out that there is "a presumption against the redevelopment for other uses". This application is not some small-



scale development, with a partial development and the remainder of the site being returned to open field. It is proposing to completely redevelop the entire site with none of the land being restored to an open field. As such, it cannot be regarded as "the minimum required to ensure a demonstrable environmental improvement", and should therefore be rejected.

It also ignores the fact that the site sits within Character Area E6: Central Plateau – Valley Heads of the Countryside Character Appraisal (CCA) and this area is afforded the highest level of protection. It means that any new development should be limited to the existing village areas of Trinity, St John, St Mary and St Ouen. Therefore, as the new development is outside of the areas mentioned it should not be approved.

Policy EVE1, in the Economic Statement is completely misleading. There are two points to this policy:

1. The development of new tourism accommodation or the extension to existing hotels / guest houses in a built-up area
2. Development of visitor accommodation, tourism and cultural attractions within the Green Zone, will be governed by Policy NE7

Point one does not apply as this is a green field site and therefore cannot be regarded as a built up area and Policy NE7 cannot be relied upon as this is a major development on agricultural land where legally the glasshouses if they are not to be used for agricultural purposes should be return to fields.

The plan submitted for the site proposes the construction of mobile units that will be "constructed on a chassis with wheels". Under Section 98 of the Planning & Building (Jersey) Law 2002, the planned units are classified as caravans and as such there are strict controls over their importation and use (Section 99). If the application is approved it would generate the first caravan park in the island. Before the establishment of a caravan park, is there requirement to change the law to allow their operation? As far back as I can recall there has always been a reluctance to allow caravan parks in the island and what are the legal obligations regarding this?

The Crime Impact Statement comments that the increase in size and the attractions on the site may make it more attractive for "criminals looking for a soft target". As a nearby resident, in a quiet rural community, I find this concerning. If this is the case, then it increases the risk for the neighbours of Tamba Park / Retreat Farm to also come under the spotlight of criminals. I question why the actions of one should impose on the safety and security of those living in close proximity. This is not acceptable and the application should be rejected on the grounds of the safety and security of those living close by.

There has already been cause to complain about the breaches of conditions at Tamba Park ranging from:

- Light pollution
- Noise pollution
- Danger to property imposed by the fireworks display
- Use of machinery out of stipulated hours
- Altering the course of the brook

[REDACTED] This clearly demonstrates that Tamba Park has a very poor record for considering the impact on its neighbours and if this application is allowed, then based on past performance it is only going to get worse.

If the application is approved what controls and what recourse will the neighbours have when there is any kind of breach to the conditions of operation? How will Tamba Park / Retreat Farm control and maintain a peaceful environment at night to prevent rowdy parties? You only have to refer to the list of complaints above to see that [REDACTED] does not have a very good record of control.

[REDACTED] because of the noise and debris from the fireworks display held over three nights. This threatened the safety of neighbours' property that were showered, quite literally, with the remains of the fireworks, anyone of which could have started a fire!

The report goes on to recommend that to reduce the risk of criminal activity and anti-social behaviour, the place should be lit up like a 'Christmas tree'. The report talks about creating a "street environment" and "good, well designed white lighting". This brings us back to a fundamental point and that is this is a rural area and as such you do not expect the area to be lit up. The reason why people live in the countryside is to get away from 'urban areas' with street lighting. Rural means living in an open swath of land that has few homes and not very many people. It is the opposite of living in a city or urban area. It is about leaving the land to itself and not destroying it by bulldozing banks and ripping up trees and hedgerows to make way for bus shelters.

To construct the bus shelters and alter the course of the road along La Rue de la Frontiere, it will require the destruction of a row of mature trees and the removal of a section of bank, that will not only threaten the protected species by the destruction of their natural habitat and vegetation but will also ruin the rural landscape. This runs contrary to Policy NE3.

The location of the bus shelter on the north side is of particular concern. It is a few yards from a blind corner and the crossing of passengers from this location will be dangerous. Traffic moving south bound will not be aware of passengers using the crossing until they are around the bend, and if any passengers decide to cross in front of the bus, as people do, it only increases the risk of an accident.

The current proposal does not offer pedestrians crossing the road good protection. Even if the speed limit is lowered from the current 40mph to 30mph, drivers will be hard pushed to slow down in time. This proposed development is unrealistic and besides destroying the countryside it does not provide any benefit to the rural community. The only benefit will be to Tamba Park.

The applicant is also proposing to widen the entrance into the car park along La Rue de la Frontiere. I cannot see any reason why.

Since the site has been taken over by [REDACTED] the entrance has already been widened. When the site was owned and operated by Flying Flowers, the entrance was perfectly wide enough to cope with the container lorries and Post Office vans that were continuously in and out of there. The architects "Origin" themselves state in their Design Statement that the existing entrance is "significantly wide access".

The visibility from the entrance maybe good and I would agree with this, but it doesn't take account the view of the motorist moving in either a north or south bound direction. The entrance sits on a blind corner and consequently you cannot see oncoming traffic. As mentioned previously, this will be particularly dangerous for passengers exiting the bus on the north side of the road.

Due to the size of the current buses, I understand that they are c.2.3m wide, wider than the old JMT buses, it makes it extremely difficult for oncoming traffic to pass. The La Rue de la Frontiere is not a major road and is typical of the type of road found in the countryside that are naturally free flowing and narrow, that open up into wider sections. This is especially true in respect of the location of Retreat Farm. Typically, traffic along this road when meeting a bus moving south bound will wait at the top of the road where there is a wide bend across the road from Field 772 to give the bus enough room to manoeuvre.

In Origin's Design Statement, it refers to the location of the car park and glasshouses as a "commercial brownfield site", which will be "green landscaped parking" that will improve the area. However, you cannot ignore the fact that in order to create this 'wonderful' car park, it means paving / concreting over the land that is registered as agricultural land.

The context of the objections raised above should be read in conjunction with the objections that I have raised in:

- P/2017/0519 – proposed construction of a staff unit that has been objected to by the Department of the Environment, Environmental Land Control in a letter dated 7th June 2017
- P/2017/0805 – proposed construction of a house and destruction of a glasshouse that is to be returned to agricultural land. It should be noted that there is a codicil on Field 78 to return it to agricultural land

The fact that [REDACTED] and [REDACTED] associates continuously drip feed these applications rather than give an overall picture of their plans for the area, only goes to show their continued contempt for [REDACTED] neighbours, who he claims in this latest application, [REDACTED] has so much concern for.

It takes a great deal of time to read through each of these applications and provide a coherent objection to each one.

Finally, if in the worst case scenario this application is granted a licence to develop a codicil should be put in place to ensure that if at any future date the company ceases to trade, the site is returned to agricultural land.

In the context of the points raised above, I strongly recommend that you reject the application.

Yours faithfully,

Philip Guthrie  
End Comment

## Application Comment

Reference: P/2017/1023

### Comment Date

19 August 2017 11:05:35

### Comment Author

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### Comment

I wish yet again to object in the strongest possible terms to this continued barrage of applications and in this case the application for the proposed development of holiday units.

Our genuine complaints and comments of the unsuitability of this area for any development of this kind are well documented and I do not wish to waste the planning departments time by repeating them here; suffice to say that these applications go against every single policy in place regarding development in the countryside.

These applications should have already been turned down by now and saved the time and effort of a public planning enquiry which I now understand is to take place.

I will however repeat myself that all of these applications are solely designed to be turned into a permanent development for housing and as such I cannot understand how these applications have managed to get this far.

I am also rather bemused by the fact that this planning application seems to have arrived somewhat via the back door as there was no notification that this application had been submitted on the planning website instead it took footwork to find out its existence.

Hopefully this was an oversight, albeit a rather dubious one I would have thought, bearing in mind this company's record to circumnavigate the various planning rules by way of retrospective applications etc..

I would like to conclude by saying that I sincerely hope that the 'Jersey Way' has not turned into being one of having a plan set in stone and then, in this case at least, overturning it for the short term financial gain of an opportunistic developer.

End Comment

## Application Comment

Reference: P/2017/1023

### Comment Date

19 August 2017 18:17:04

### Comment Author

First Name: John

Last Name: Corbin

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### Comment

I am writing to object in the strongest possible terms to the above application.

The fact that it is in direct conflict with policy NE7 and policy NE3 should be enough to ensure refusal but it seems that so far it has not been sufficient to deter the applicant from continuing to make varied and opportunistic applications.

Well known to the committee by now I am sure are the various other policies with which this application conflicts and it is not my intention to rehearse them here, suffice to say they have been well pointed out by others and that should be sufficient determining this application and reject it.

As it now appears as of today's date that this application will go to a public hearing in front of an inspector I think it is worth pointing out a few facts as to the planning history to date of this site.

Firstly that this agricultural site was built upon by dint of the largest subsidy given to agriculture to date in order to erect glass houses for agricultural purposes.

These glasshouses are still there, with the exception of an area which recently was subject to a most unfortunate fire caused, we are told, whilst performing dental work on a dinosaur!

They are, by the owners own admission in excellent condition and whilst the owner has attempted to lease/sell them it has been at a totally unrealistic price and the fact that there were no takers comes as no surprise.

The first development under the current ownership was developing existing outbuildings into units of accommodation and sold undoubtedly at a profit to private buyers.

It is unclear to me whether the application for a managers house is included in this application but if so this fact should be looked at and the application refused, both on the basis of the previous development and the fact that there are still units of accommodation available for this existing on the site.

There have also been a number of retrospective applications approved under what grounds I have no idea but which have proved detrimental to the area as a whole, trees removed etc.

One of the more notable retrospective applications was to house birds of prey which of course included a large concrete base.

Fortunately this particular attraction was dropped after it appeared that Tamba were unable to fully control this activity but I mention it specifically because the current owner has publically stated that development is all about concrete, of course this base has not been removed and just adds to his argument.

There is also, again well rehearsed, the argument of the protection of the countryside, we are an extremely rural area, and since Tamba has been in operation we, the neighbours, have been subject to a dangerous increase in traffic movements, a highly increased level of noise and light pollution and problems with flooding, not to mention the problems caused by having an entertainment area situated in a totally unsuitable area.

I find the traffic report very interesting and completely inaccurate.

Yes La Rue de la Frontiere is a 40 MPH zone but unless it is at the depth of night I defy anyone to average a speed above 15MPH, the road is very narrow with few passing places necessary when commercial vehicles, horseboxes etc are proceeding in opposite directions.

The addition of a bus stop will only exacerbate this problem with the extra buses needed for this attraction and the service being offered to the residents of the proposed new units being offered transport to other parts of the island adding to the chaos.

I am somewhat bemused by the application to build 'eco houses' just exactly what does this mean?

An 'eco house' is a unit of accommodation, whether or not it arrives on a low loader with an axle underneath or not it is placed onto a concrete (that word again) plinth and then connected to the utilities.



The fact that the manufacturers deem it to be eco is neither here or there, it is a fully fixed establishment once erected and no one should be fooled by this fact.

Whilst by dint of their construction these units are more moveable than a solid structure with foundations once this construction, if allowed, went the way so many Jersey businesses have historically and been closed down would the concrete bases and all of their connecting pipes then be allowed to be used as permanent structures i.e. houses, or would planning insist on them being dug up and the land returned to agriculture?

Sadly, I fear the former.

I could go on, this is a high water table area, how will all the surplus water usage from the proposed restaurant, gym, shops etc be dealt with?

How will the road structure in the area in general deal with the extra traffic generated?

How will the natural wildlife be affected by this incursion into their habitat?

What effect will this have on the equine animals based nearby?

How will the light pollution caused by security precautions effect the habitat, and if this is not provided what will happen to the crime rate with all of the extra itinerant population housed there?

The questions are endless, the answers are far easier to establish, no good whatsoever will come to the countryside nor its history nor its future which we who live here should be bound to pass on to our successors as their own Jersey heritage.

Once it is destroyed by plans like this it is destroyed forever,

Finally I am totally bemused by the support this application has received from Visit Jersey.

This proposed development is being promoted as a kind of mini Centre Parc.

Do they have any idea what an actual Centre Parc is, what it does with all of the facilities built in to keep the residents on site, the space it takes up in acres etc; somehow I doubt it?

Would they be aware that self catering accommodation on the west of the island is being closed down because it is not economically viable?

Would they be aware of the hospitality trade's constant complaint of a lack of labour to staff the existing trade, never mind a new one set in the middle of the countryside?

In short this is, despite what the promoters wish the planning authorities to believe, a green (not brown) field site, it is a site specifically set aside for agriculture and has a legal obligation to be returned to its former once it has outlived its useful economic function.

The name says it all, La Retrait FARM.

I would urge the committee to see this application for what it actually is, a circuitous route to build permanent homes in the countryside.

We have an island plan; if there is no intention to stick to it then why have one in the first place?

End Comment

## Application Comment

Reference: P/2017/1023

### Comment Date

17 August 2017 11:40:28

### Comment Author

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### Comment

Re this Tamba Park application. I strongly object and endorse [REDACTED] letter of 16th Aug on all points. As discussed at the planning meeting this should be turned down until all planning applications are submitted in one application so we can have a total overview of the proposed plans

End Comment

## Application Comment

Reference: P/2017/1023

### Comment Date

17 August 2017 11:33:42

### Comment Author

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### Comment

We would like to strongly object to yet another Retreat Farm /Tamba Park development application.

Having attended in person the last public planning meeting on 27 July regarding a previous planning application for the managers house, it was clearly decided that ALL future applications should be submitted in total and not PIECEMEAL. Here again is another single application.

There is so many reasons why this a development is so wrong in this location. VEHICLE ACCESS, drainage, lack of car parking and traffic increase on very narrow lanes in both directions. This new mobile caravan park (not eco houses as described)is totally unacceptable.

End Comment

## Application Comment

Reference: P/2017/1023

### Comment Date

19 August 2017 16:12:34

### Comment Author

First Name: WILLIN LTD

Last Name:

Address Line 1:

Address Line 2:

Address Road:

Address Town:

Address Parish:

Address Postcode:

Email Address:

### Comment

SELF CATERING ACCOMMODATION – RETREAT FARM P/2017/1023

Residents and animals/livestock have had a very difficult time since the property was purchased by JAJ Properties Ltd. Willin Limited has had to check each and every planning application made by this company and as the committee is aware, these have been numerous. There have also been retrospective planning applications such is the confidence of JAJ Properties to think they are above planning legislation. This current application as listed above should be rejected for the following reasons:-

- 1 First and foremost, it does not comply with the Island Plan given that it is only part of an application to develop 33 buildings on agricultural land. Only a small proportion of this land will be returned to an open field however, this is a requirement as there is an existing codicil to do so.
- 2 Rue de la Frontiere is already a very difficult road to navigate with its width altering along the route and many blind corners.
- 3 The plans do not seem to provide adequate parking for peak times and seasonal staff.

- 4 The privacy of and enjoyment of neighbour's properties would be seriously harmed. The noise emanating from the park as it is, affects every one in close proximity.
- 5 There is no adequate proposal for public transport access. Two buses cannot pass each other on this road. In addition children are left on the roadside bends waiting for buses. This will lead to a dependency on the private car and increase traffic in an already challenged area.
- 6 Why allow further self-catering units to be built when application P/2017/0352 by Corbiere Phare has been made to turn high quality self-catering units into 9 one-bedroom apartments as the applicant stated that there was not the demand to continue! Yet these are located in a natural beauty spot with good major road access and a short walk to beaches and the Railway Walk. If it does not work here, it most certainly will not work in a historically agricultural area. I think we all know that getting the land re-zoned from agricultural land for housing is JAJ Properties Ltd.'s main aim.

When one considers the current application with all the previous ones, it is basically an application to build 29 homes and 4 outbuildings on agricultural land. There is no additional return of land to an open field as they are looking to have a change of use of Field 770 from agricultural field to car park and then it may be required for housing! The greenhouse on Field L78 has to be returned to agriculture, as there is an existing codicil on it.

There has already been a substantial amount of housing development on this site causing major disruption and dramatically affecting the drainage network. The profits made from the houses sold should have been utilized to return the greenhouses back to open agricultural fields, which would enhance the area and be in keeping with its original purpose. Any further approval of housing in this area and in particular on this site would set a very dangerous precedent for all the other unused greenhouses on the Island. Why can JAJ Properties Ltd not assist farmers and small business in renting out the greenhouses at a feasible rent? They are being advertised as being in 'good condition' but the rental required is so unrealistic.

The applicants have blatantly ignored a variety of conditions and laws relating to this site to the detriment of neighbours and your committee. They exceed noise levels, they use agricultural land for non-agricultural purposes, operate machinery out of hours, erect an unapproved marquee as well as changing the flow of a natural stream! The owners and management are continually causing stress, noise and being disrespectful to neighbours' right to enjoy their own property.

I note that the units proposed would be mobile or non-permanent, meaning they can be moved. I was unaware that this was to be a caravan park, with limited road width access to it! If the change of use to allow movable units is granted, it will not be long before the

applicant re-applies for permanent housing on the site. The applicant basically is going the long way round to rezone the land from agricultural to housing! If a codicil was placed on the site so that should (and I hope not) permission be granted for this application, the land has to be returned to agriculture. I can see a major court case looming!

The applicant is also proposing to have a games room/gym and shop, which once again is in an agricultural area not an urban site. There is a long established gym within a mile of this location. The proposed 228 car parking spaces will never cover the requirement at high season/peak usage times. There is also no allowance made for one off exceptional events. Their last firework display caused chaos in the area. In addition, they have restrictions in place to prevent delivery/servicing out of hours so the traffic will be increased during their operation hours.

The Department of Infrastructure have made it quite clear that the current pumping stations located on Rue de La Frontiere and La Rue Des Varvots are operating at maximum capacity and raw sewage spillages have been reported over the last few years as a result of this. This area simply cannot cope with further development and the requirements that this involves.

Is the committee really going to grant permission for a stunning agricultural field (Field 772) lined with mature trees and hedgerows with protected species contained therein, to be demolished for the benefit of a footpath and a bus shelter? I would ask that the committee think long-term as once the mobile units are gone so will the use be for extra capacity for buses and passengers. These proposed changes are only beneficial for the Tamba Park and the visitors who attend it. This tourist attraction is not a long-term business; please think about the Living Legend site and what it has now become.

May I ask the committee to put an end to the constant and superfluous applications that are made on this site? All residents and the wider public have been extremely inconvenienced by having to comment on the last 3 applications submitted from April 2017 to 1st August 2017, all of which do not conform to the Island Plan. I do think that JAJ Properties think that if they keep 'knocking on the door' that someone will let them in. Let us just say "NO" and preserve this very rural area.


JAJ Properties Ltd purchased the site with the full knowledge of the zoning and codicil requirements for the land, it would be beneficial for them to work with the agricultural community to utilize the site for its intended purpose. The States provided the largest agricultural loan to develop this site many years ago for the benefit of the Island and agricultural community, are we really going to let a property developer bully us into altering this decision to allow building for purely financial gain? They clearly have no interest in the environmental problems any further development of this site will cause. I suggest JAJ Properties Ltd be made to respect the Island Plan as it was implemented to benefit the Island in the long term and not line their pockets to the detriment of the environment, wildlife, neighbours and the Jersey residents who enjoy walking, cycling and riding in this wonderfully

rural area. Please put an end to the continuous applications for development of this site and order it to be returned to agricultural use.

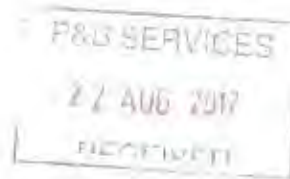
For and on Behalf of Willin Ltd

End Comment





19th August 2017



For the attention of the Planning Minister  
Planning & Building Services  
States of Jersey  
St Helier, Jersey, JE2 4US

Dear Minister, Planning Department and Member of the States of Jersey

**Re: Retreat Farm - Application P/2017/1023 - Self Catering Lodges**

I am writing to object to the above application.

I object both in terms of the impact on the community, local wildlife and sustainable development, and the potential breaches of NE7 AND ERE 7 of the Island Plan as well as many other breaches of the Island Plan.

The Island Plan NE7 sets out a high level of protection from development in the Green Zone and there is a general policy presumption against all forms of development. In addition new development should not cause serious harm to landscape character. The proposed development is non essential development in the Green Zone countryside of St Mary and St Lawrence which will damage the rural character of the surrounding area.

It is important to note that glasshouses are a normal part of agriculture and these glasshouses were used in horticulture until very recently.

**Noise and Existing Noise issues.**

There are already significant noise issues from the Old Lion Park now, which Tamba Park had retrospective planning passed. Very detailed conditions were put in place by planning on this when the retrospective planning was passed due to the major issues there had been in the day time with significant noise levels. Which the conditions were meant to elevate these issues of noise we had with the existing Tamba Park. **This has not happen as the conditions are mainly not adhere too. All the extra work and time over these last few years that, the police, environment and planning have had to put in is major. Due to the fact that the same developer that has put this application in breaks the current conditions on the existing development of Tamba Park that planning put in place, to the degree that compliance officers have had to be used to try and bring the situation under control.**

**The noise levels and the conditions are still not in control on the existing Tamba Park, surely adding to this development would only compound the already existing noise issues and the breaking of existing planning conditions.**

## The Island Plan

**Detailed below are some of the areas where the application is not compliant with the Island Plan, that is in place to protect Jersey's countryside.**

**SP1** of the Island Plan states that development will be concentrated within the Island's built up area and planning permission will only be given for development "appropriate to the coast or countryside". I don't feel that this development in one of the most remote, underpopulated and rural parts of the rural countryside. In fact, I feel it will cause serious harm to the rural identity and character.

**SP2.24** states that "the Minister for Planning and Environment will seek to protect these countryside assets from inappropriate and non essential development. The guiding principle for development here is a general presumption against development, for whatever purpose, except where a coastal or countryside location is essential, combined with the objective of redirecting this development towards existing settlements".

**E5.137** states that "the Jersey countryside is one of its most prized assets, but the limited supply of land in the Island has resulted in it being subject to considerable pressure for development ...development includes housing and demand for tourism and leisure activities. All of these, to a greater or lesser extent can threaten landscape character and biodiversity and require careful control while meeting the needs of the Islands residents".

Regards

A large black rectangular redaction box covering the signature area.

Vicki De La haye

## Application Comment

Reference: P/2017/1023

### Comment Date

18 August 2017 07:52:35

### Comment Author

First Name: J

Last Name: Guthrie

Address Line 1:

Address Line 2:

Address Road:

Address Town:

Address Parish:

Address Postcode:


Email Address:

### Comment

17 August 2017

Dear Sir,

JAJ Properties Ltd, La Rue de la Frontiere, St. Mary, JE3 3EG – P/2017/1023

 I am writing to strongly object to the latest planning application to the building of 27 self-catering units, various ancillary structures, the widening of the entrance, car park and bus stop within a designated green zone.

There can be no doubt that this application contravenes Policy NE7, which sets out a high level of protection from all forms of development in the Green Zone. This application represents a major development that proposes to demolish the greenhouses and "change of use of resulting agricultural field to car park...". So, despite Mr P Straddon's Inspectors Report, which declares that greenhouses are legally temporary and once their use is over the land will return to agricultural use. The applicant, knowing at the time of purchasing Retreat Farm that the land is classified as agriculture, is ignoring this and instead proposing to concrete over the "resulting agricultural field"!

The policy further states there are several development types that will not be permitted; this includes new dwellings as well as the redevelopment of glasshouses, as in the case of the

application submitted above.

If this application is approved, where will this all end? Deputy Luce recently pointed out in the JEP (27th June 2017); he is "envious of Guernsey's planning policy of not allowing abandoned greenhouse sites to be turned into housing". Deputy Luce also mentions that permitting planning applications to convert greenhouses "into residential developments in some cases would discourage other Islanders with redundant greenhouses from returning them to agricultural land".

The application talks about this development improving the local environment by the removal of the glasshouses. If the applicant were to return the land to agricultural use, as Mr P Straddon's report asserts, this would indeed be the case; but that is not the situation here. This application, if approved, would result in the urbanisation of the area, which will not only be seriously detrimental to the area but will also set a dangerous precedent for all other glasshouses in the island.

Is this the start of the gradual urbanisation and destruction of the countryside as we know it today? If so, shame on us for destroying the character and nature of the beautiful countryside that islanders and tourist so enjoy and which Policy NE3 seeks to protect for future generations.

In the Economic Statement produced for [REDACTED] on 30th June 2017, it refers to Policy NE7, 10. Section b of this policy states development for another use is subject to "demonstrable environmental gains, contributing to the repair and restoration of landscape and use". If by this they mean subjecting his neighbours to increased light and noise pollution that will without doubt be the case, then they clearly do not have any understanding of what it means to live in the countryside. The application gives a great deal of emphasis on the lighting required to ensure the security of the site. This effectively means that [REDACTED] neighbours might as well be living in town with the delights of street lighting. The whole point of living in the countryside is to enjoy the natural surroundings and at night this means the dark. Having artificial light being forced upon you does not "contribute to the repair and restoration of landscape". In addition, with the attraction of tourists it will result in an increased "occupation and use" and noise, not reduce it.

The application continuously refers to the site as 'industrial', 'brownfield' or 'quasi-industrial' to give the impression that the glasshouses do not sit on an agricultural site. This notion is destroyed by their own application which refers to the "change of use of resulting agricultural field". It appears to be a cheap attempt by the various parties involved to convince people that the site is classified as something that it is not.

Policy E1 in the Economic Statement further supports the notion of the urbanisation of the area.

- Section 5 refers to "Support the provisions of shopping and services within local centres"
- Section 6 to "Ensure that new commercial, retail and industrial developments take place in locations which are accessible, avoid physical constraints and minimise the impact on the environment".

The proposed construction of 27 holiday rentals, shops, reception, gym, laundrette and car park on the largest glasshouse site on the island, clearly indicates that this does not have a low impact on the area, and the policy itself talks about retail and commercial development, which is more akin to a development in a town or city. As such, it does not represent an improvement to the local environment.

The Economic Statement puts a great deal of emphasis on Policy SP5, which supports the diversification of the economy. However, in so doing they are ignoring the fact that the land is classified as agricultural and is therefore afforded a great deal of protection from development away from this. It doesn't mean that they can take agricultural land and develop it for tourism. The expectation is that once glasshouses become redundant / derelict there is a presumption against other use.

With the States keen to encourage our farmers to grow alternative crops, the glasshouses provide ready-made facilities to support diversification in agriculture. There have been several articles in the JEP in recent times on alternative crops (hemp, cannabis for medicinal purposes, honeyberries and tea), being investigated or licenced.

Surely this presents [REDACTED] with an ideal opportunity to go into business with farmers and owners of glasshouses, to diversify agricultural production and take advantage of the purpose-built greenhouses across the island to produce economically viable alternative crops. The most recent article (17th August), reports that the trials are going well and this will lead to the production of a commercial crop "to diversify and broaden the rural economy".

With [REDACTED] entrepreneurial nous and the farmers knowledge and experience of the land and local conditions, it presents a unique opportunity for the island to be at the forefront of this new industry and thereby reduce the islands reliance on the finance sector. All of which supports Policy SP5.

The Marketing Strategy Method Statement produced for [REDACTED] confirms that overall the glasshouses are in a good condition, so if the intention is to maintain and diversify the economy (SP5), what better way than to utilise these glasshouses that are "in general in excellent condition" for these alternative crops.

The Economic Statement mentions Policy ERE7, but fails to point out that there is "a presumption against the redevelopment for other uses". This application is not some small-scale development, with a partial development and the remainder of the site being returned

to open field. It is proposing to completely redevelop the entire site with none of the land being restored to an open field. As such, it cannot be regarded as "the minimum required to ensure a demonstrable environmental improvement", and should therefore be rejected.

It also ignores the fact that the site sits within Character Area E6: Central Plateau – Valley Heads of the Countryside Character Appraisal (CCA) and this area is afforded the highest level of protection. It means that any new development should be limited to the existing village areas of Trinity, St John, St Mary and St Ouen. Therefore, as the new development is outside of the areas mentioned it should not be approved.

Policy EVE1, in the Economic Statement is completely misleading. There are two points to this policy:

1. The development of new tourism accommodation or the extension to existing hotels / guest houses in a built-up area
2. Development of visitor accommodation, tourism and cultural attractions within the Green Zone, will be governed by Policy NE7

Point one does not apply as this is a green field site and therefore cannot be regarded as a built up area and Policy NE7 cannot be relied upon as this is a major development on agricultural land where legally the glasshouses if they are not to be used for agricultural purposes should be return to fields.

The plan submitted for the site proposes the construction of mobile units that will be "constructed on a chassis with wheels". Under Section 98 of the Planning & Building (Jersey) Law 2002, the planned units are classified as caravans and as such there are strict controls over their importation and use (Section 99). If the application is approved it would generate the first caravan park in the island. Before the establishment of a caravan park, is there requirement to change the law to allow their operation? As far back as I can recall there has always been a reluctance to allow caravan parks in the island and what are the legal obligations regarding this?

The Crime Impact Statement comments that the increase in size and the attractions on the site may make it more attractive for "criminals looking for a soft target". As a nearby resident, in a quiet rural community, I find this concerning. If this is the case, then it increases the risk for the neighbours of Tamba Park / Retreat Farm to also come under the spotlight of criminals. I question why the actions of one should impose on the safety and security of those living in close proximity. This is not acceptable and the application should be rejected on the grounds of the safety and security of those living close by.

There has already been cause to complain about the breaches of conditions at Tamba Park ranging from:

- Light pollution
- Noise pollution
- Danger to property imposed by the fireworks display
- Use of machinery out of stipulated hours
- Altering the course of the brook

[REDACTED]  
[REDACTED] This clearly demonstrates that Tamba Park has a very poor record for considering the impact on its neighbours and if this application is allowed, then based on past performance it is only going to get worse.

If the application is approved what controls and what recourse will the neighbours have when there is any kind of breach to the conditions of operation? How will Tamba Park / Retreat Farm control and maintain a peaceful environment at night to prevent rowdy parties? You only have to refer to the list of complaints above to see that [REDACTED] does not have a very good record of control.

[REDACTED] because of the noise and debris from the fireworks display held over three nights. This threatened the safety of neighbours' property that were showered, quite literally, with the remains of the fireworks, anyone of which could have started a fire!

The report goes on to recommend that to reduce the risk of criminal activity and anti-social behaviour, the place should be lit up like a 'Christmas tree'. The report talks about creating a "street environment" and "good, well designed white lighting". This brings us back to a fundamental point and that is this is a rural area and as such you do not expect the area to be lit up. The reason why people live in the countryside is to get away from 'urban areas' with street lighting. Rural means living in an open swath of land that has few homes and not very many people. It is the opposite of living in a city or urban area. It is about leaving the land to itself and not destroying it by bulldozing banks and ripping up trees and hedgerows to make way for bus shelters.

To construct the bus shelters and alter the course of the road along La Rue de la Frontiere, it will require the destruction of a row of mature trees and the removal of a section of bank, that will not only threaten the protected species by the destruction of their natural habitat and vegetation but will also ruin the rural landscape. This runs contrary to Policy NE3.

The location of the bus shelter on the north side is of particular concern. It is a few yards from a blind corner and the crossing of passengers from this location will be dangerous. Traffic moving south bound will not be aware of passengers using the crossing until they are around the bend, and if any passengers decide to cross in front of the bus, as people do, it only increases the risk of an accident.

The current proposal does not offer pedestrians crossing the road good protection. Even if the speed limit is lowered from the current 40mph to 30mph, drivers will be hard pushed to slow down in time. This proposed development is unrealistic and besides destroying the countryside it does not provide any benefit to the rural community. The only benefit will be to Tamba Park.

The applicant is also proposing to widen the entrance into the car park along La Rue de la Frontiere. I cannot see any reason why.

Since the site has been taken over by [REDACTED] the entrance has already been widened. When the site was owned and operated by Flying Flowers, the entrance was perfectly wide enough to cope with the container lorries and Post Office vans that were continuously in and out of there. The architects "Origin" themselves state in their Design Statement that the existing entrance is "significantly wide access".

The visibility from the entrance maybe good and I would agree with this, but it doesn't take account the view of the motorist moving in either a north or south bound direction. The entrance sits on a blind corner and consequently you cannot see oncoming traffic. As mentioned previously, this will be particularly dangerous for passengers exiting the bus on the north side of the road.

Due to the size of the current buses, I understand that they are c.2.3m wide, wider than the old JMT buses, it makes it extremely difficult for oncoming traffic to pass. The La Rue de la Frontiere is not a major road and is typical of the type of road found in the countryside that are naturally free flowing and narrow, that open up into wider sections. This is especially true in respect of the location of Retreat Farm. Typically, traffic along this road when meeting a bus moving south bound will wait at the top of the road where there is a wide bend across the road from Field 772 to give the bus enough room to manoeuvre.

In Origin's Design Statement, it refers to the location of the car park and glasshouses as a "commercial brownfield site", which will be "green landscaped parking" that will improve the area. However, you cannot ignore the fact that in order to create this 'wonderful' car park, it means paving / concreting over the land that is registered as agricultural land.

The context of the objections raised above should be read in conjunction with the objections that I have raised in:

- P/2017/0519 – proposed construction of a staff unit that has been objected to by the Department of the Environment, Environmental Land Control in a letter dated 7th June 2017
- P/2017/0805 – proposed construction of a house and destruction of a glasshouse that is to be returned to agricultural land. It should be noted that there is a codicil on Field 78 to return it to agricultural land



The fact that [REDACTED] and [REDACTED] associates continuously drip feed these applications rather than give an overall picture of their plans for the area, only goes to show their continued contempt for [REDACTED] neighbours, who he claims in this latest application, [REDACTED] has so much concern for

It takes a great deal of time to read through each of these applications and provide a coherent objection to each one.

Finally, if in the worst case scenario this application is granted a licence to develop a codicil should be put in place to ensure that if at any future date the company ceases to trade, the site is returned to agricultural land.

In the context of the points raised above, I strongly urge you to reject the application.

Yours faithfully,

Mrs J B Guthrie  
End Comment

23 AUG 2017

Retreat Farm - P/2017/1023

21st August, 2017

Dear Committee,

[REDACTED] has yet again submitted an application to change Tamba Park into, in this case living accommodation, at the moment in the guise of providing self catering accommodation for Tourists.

I have been told that a similar development elsewhere in the Island is slowing down as it was not popular with Tourists.

The development of good landscaping would take years and if done well would be very expensive. The maintenance would increasingly cost a great deal and who would pay for it.

Once on Tamba moveable houses would have established the area as residential and could then be moved and a permanent housing estate built.

[REDACTED] [REDACTED]

Tourists would not enjoy living in this part of Jersey. They want access to shops, the town, beaches and entertainment. None of that is here in St Mary's. I am sure that [redacted] would be very willing to provide shops and restaurants as well as entertainment, it would be the next application rather back to the previous plans.

At the moment buses and lorries have difficulty in passing. [redacted] has stated that [redacted] plans to turn agricultural land into a car park, within La Rue de la Frontiere and alter viticultural access. You can not do that in Jersey.

[redacted] architect says that it does not matter that this application is in a green zone and that the type of development is contrary to the Island plan. It does matter

The destruction of this area if [redacted] application were to go ahead would be

3

significant and would turn this agricultural part of Jersey into a town type of place. This simply must not happen.

The opposition of local people is enormous, the same as to the previous application.

[REDACTED]

Tamba is an agricultural area and could make money by using it as an agricultural place.

We who live here and value what we have want this part of St Marys to remain what it has always been. Its value is in remaining agricultural, its what the tourists enjoy

Yours sincerely

[REDACTED]

PAR SERVICES  
22 AUG 2017  
RECEIVED

Dear Sir

Re: Planning Application P2017/1073

I would like to register my strong objection to the above mentioned application to build on Retreat Farm agricultural land.

I have lost count of the number of applications made in the last two years to build on this land. The applicant would've been fully aware when he purchased Retreat Farm that it was his duty and legal obligation to return the land to agriculture if the greenhouses were no longer going to be used.

The very rural area in which the proposed holiday village would be built should not be changed from agriculture to a built up area - as specified in the Island Plan. It would set a very worrying precedent for the entire Island.

I personally feel that, if this village were allowed to be built, it would end up servicing local people getting divorced and using the eco houses as temporary accommodation while their divorces go through (which is what I believe is very much the situation at Les Ormes) and would have very little to do with promoting tourism.

I would ask the Planning Enquiry Committee to please reject this application and allow St Mary and St Lawrence to remain the the rural parishes they have always been.

Yours sincerely

Mrs E Daghorn



P&B SERVICES

30 AUG 2017

RECEIVED

[REDACTED]

States of Jersey  
Planning and Building Services  
South Hill  
St Helier JE2 4US

24 August 2017

Your ref:- P/2017/1023 Retreat Farm

Dear Sirs

As residents of St Mary, and with the location of the proposed Retreat Farm project [REDACTED] and I are naturally interested in the proposals set out in this application.

We've had a look at the submission documents. The accommodation envisaged is 27 bungalows which when fully occupied would house 68 people and all the services required to maintain them. The paperwork talks about the project being "modest" [REDACTED]. It's a huge project to foist upon an island one third the population of Basingstoke, let alone one of the few parishes in our Island that remains relatively unspoiled by the [REDACTED] increasing population.

The plans talk about the development being for holiday occupation, implying that the buildings will be unoccupied in wintertime. We suggest that this will not long be the case. Jersey residents will seek to occupy this site permanently. It's a case of powerful demand chasing limited supply. Consider the pressure if the tourist park were to be a financial failure. The Island's experience with building facilities principally for the amusement and amenity of our tourists is a mixed one. The old Living Legend is no more, Plemont is no more, and others have fallen into disuse because of a change in fashion or management ineptitude. [REDACTED]

[REDACTED]

The point is being constantly made that our Island's size is finite. That's one of the reasons we have an Island Plan in place which presumes against all forms of development in "Green Zones". Why should its provisions not apply to the Retreat Farm project? We can easily envisage Retreat Farm turning into a thoroughgoing little village in the not too distant future. [REDACTED]

[REDACTED] development of this kind is just what the Island Plan is designed to discourage.

A prime example of a facility being built and then failing to meet the expectations of its promoters is Fort Regent. If the promoter of the Retreat Farm project could be persuaded to channel his enthusiasm towards the revival of that costly white elephant then he would be doing the Island a real service.

May I ask you please to take this letter as our objection to the Retreat Farm project.

Yours faithfully

[REDACTED]  
M P Pinchard

M. L. SINEL

ADVOCATE

P&B SERVICES

30 AUG 2017

RECEIVED

MLS/FIB/SINE

29 August 2017

Department of the Environment  
Planning & Building Services  
South Hill  
St Helier  
JE2 4US

Dear Sirs

Retreat Farm, La Rue de la Frontiere, St Lawrence/St Mary, JE3 3EG – Planning Application No. P/2017/1023

[REDACTED] did not have to buy Tamba Park with all its associated problems [REDACTED]

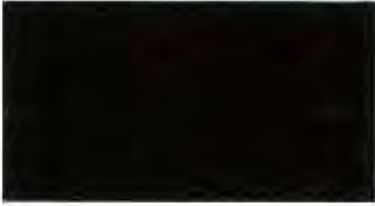
[REDACTED] There is no reason why he should be so enabled, especially when the concessions he needs are contrary to the Island Plan (which should be strictly adhered to) and would change the nature of a large, peaceful and mainly rural area of the Island to the detriment of its inhabitants.

St Lawrence and St Mary are not urban tourist centres and should not have one thrust upon them.

Yours faithfully

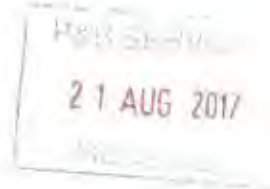
[REDACTED]  
[REDACTED] Malcolm L Sinel



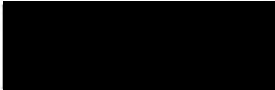


22nd August 2017.

Re application  
P/217/1023.




Dear Sir,

 I wish to object to the above application.

The Self catering Accommodation units x 27, and a green zone Agriculture land car park for 228 spaces will be the very worst case scenario, and the Rue de la Frontiere is a country road, and should, with St Lawrence, be max speed of 20 mph.

Yours Sincerely,

Pam O'Shaughnessy



Planning Officer  
Department of the Environment  
Planning and Building Services  
South Hill  
St Helier  
Jersey.JE2 4US



20<sup>th</sup> August, 2017

Dear Sir,

JAJ Properties Ltd, La Rue de la Frontiere, St Mary, JE3 3EG -P/2017/1023

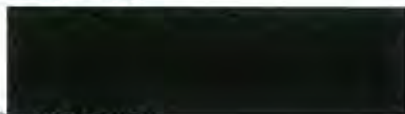
As a neighbour I am writing to strongly object to the above application to the building of 27 mobile self catering units together with various ancillary units, the construction of a vast concrete car park, and the widening of the entrance. There is no doubt that this application contravenes Policy NE7 which sets out a high level of protection from all forms of development in The Green Zone. The application ignores the fact that the site sits within Character Area E6 - Central Plateau which is afforded the highest level of protection and that any new development should be limited to the existing village areas of Trinity, St John, St Mary and St Ouen.

The greenhouses which it is proposed to demolish are modern, well built, in a good state of repair and well capable of food or other green product production on a large scale. It would be obscene to destroy them when food production will become a priority for the Island in the years ahead. Should they be demolished then reversion to green field, again for food production, or other agricultural use should be mandatory.

Regarding the proposed use of mobile units (Caravans); then under Section 98 of the Planning and Building (Jersey) Law 2002 there are strict controls over importation and use. This application could be interpreted as an attempt to construct a Caravan Park by another name!

I consider that the principles outlined in the Island Plan are being severely tested in this application and request it be rejected in its entirety.

Yours faithfully,



E. D Le Gresley  
Mrs..

Planning Officer  
Department of the Environment  
Planning and Building Services  
South Hill  
St Helier  
Jersey.JE2 4US

P&B SERVICES

22 AUG 2017

RECEIVED

20<sup>th</sup> August, 2017

Dear Sir,

JAJ Properties Ltd, La Rue de la Frontiere, St Mary, JE3 3EG -P/2017/1023


As a neighbour I am writing to strongly object to the above application to the building of 27 mobile self catering units together with various ancillary units, the construction of a vast concrete car park, and the widening of the entrance. There is no doubt that this application contravenes Policy NE7 which sets out a high level of protection from all forms of development in The Green Zone. The application ignores the fact that the site sits within Character Area E6 - Central Plateau which is afforded the highest level of protection and that any new development should be limited to the existing village areas of Trinity, St John, St Mary and St Ouen.

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I consider that the principles outlined in the Island Plan are being severely tested in this application and request it be rejected in its entirety.

Yours faithfully

  
A. I. Le Gresley  
Sqn Ldr.(R.A.F.)  
(Retd.)

Department of the Environment  
Planning and Building Services  
South Hill  
St Helier, Jersey, JE2 4US  
Tel: +44 (0)1534 445508  
Fax: +44 (0)1534 445528

States of Jersey

Planning and Building Services  
South Hill  
St Helier  
Jersey  
JE2 4US

P&B SERVICES

21 AUG 2017

RECEIVED

Your Name and Address: (Capitals please)

JOHN LAM HAWKTON

Application reference:

P/2017/1023

Application address:

RETREAT FARM / TAMBA PARK.

Objection



Support

(Please tick appropriate)

Your comments:

AS ENCLOSED.

Signed:

Day time

Tel No:

Print Name:

Date:

20 / 8 / 2017

E-mail Address



20/8 /2017

Department of the Environment  
Planning and Building Services  
South Hill  
St Helier  
JE2 4US

P&B SERVICES  
21 AUG 2017  
RECEIVED

Dear Sir

P/2017/ 1023 --- RETREAT FARM/ TAMBA PARK

I AM WRITING TO OPPOSE THE ABOVE MENTIONED APPLICATION FOR THE FOLLOWING REASONS

Since Tamba Park opened the owners have bombarded the neighbouring residence with numerous planning applications which I find hard to keep up with. I am wondering if there is a reason for this The Tamba Park Management [I hope this is the right title as there seems to be so many companies involved in this project] already have had 5 houses and 4 flats built on this site. Further building would be overdevelopment on this GREEN ZONE SITE and raises a concern that if permission was granted further applications for housing will be submitted in the future also permitting the demolition and/ or change of use of greenhouses for development rather than reinstating their previous agricultural use will set a precedent for the rest of the island.

This application to alter the road layout to accommodate a new bus stop would be extremely dangerous and would be accidents waiting to happen After looking at the recent drawings I can not believe that a professional company would submit this for approval. It has not been made clear if there will be one or two bus stops in the area, have they taken into consideration that people living in the Rue de Varvots area would have a extra 150 yards to walk and bearing in mind the people using the buses are usually older or younger people This cannot be allowed to happen.

As has been pointed out many times before, the fowl drainage system in this area is not capable of processing the volume of sewage at present. How can this system take another 27 housing units ?

When this company bought the site they were aware that it was part of THE ISLAND PLAN as a GREEN ZONE AREA . We as neighbours have no doubt that the main objective of the management is to build a complete housing estate on this green field site. Tamba Park amusement park will be demolished ,the portable cabins will be removed[why do you think they are portable cabins ]that is if they were ever installed. Reasons for their demise would be given possibly as not financially viable with permission being sought to build more housing

I ask the question to our committee : is this what we want for our country parishes ?

Yours faithfully



Ian Hamilton

23 AUG 2017



20<sup>th</sup> August 2017

Department of the Environment  
Planning and Building Services  
South Hill  
St Helier,  
Jersey, JE2 4US

Dear Sirs

Retreat Farm - P/2017/1023

I am writing to object to the proposed further development of Tamba Park/Retreat Farm. Over the years, in the green zone, there has been another house built here or there, or the breaking up of one property and its expansion into several housing units. There is always another development allowed, resulting in the countryside shrinking and changing. However, the area in which the above development is to take place is still a rural vingtaine. This should be respected and preserved.

There is a general legal presumption that development in accordance with the Island Plan will be permitted and development that is inconsistent with the plan will normally be refused, unless there is sufficient justification for overriding its provisions. The proposed development at Tamba/Retreat Farm contravenes the Island Plan in a number of ways.

The Island Plan's Spatial Strategy Policy (SP1) sets out the spatial strategy which seeks to concentrate new development within the Island's defined Built up Area, in particular, within St. Helier. That Strategic approach is supported by SP2, which seeks to ensure that the development makes the best and most efficient use of resources, including land and by SP 3 which sets out a Sequential approach to development. Further SP 4 affords a "high priority" to protect the Island's natural and historic environment.

Thus the spatial strategy of the Island Plan is based on the following hierarchical sequence of principles:

- Development within the main Built-up Area of the Town of St Helier; *The proposed development is outside St Helier.*
- Development within the Built-up Area outside the Town of St Helier, including those parts of the Island's urban environment identified and defined in the hierarchy of settlements and defined on the Proposals Maps; *The proposed development is outside the built up area of the Town of St Helier.*
- Development of brownfield land outside the Built-up Area, to meet an identified need and where it is appropriate to do so; *This is an agricultural not a brownfield site and would be development of a green zone.*
- In exceptional circumstances, the development of land outside the Built-up Area to support the rural economy; *This development is contrary to the needs of the rural economy.*

In addition, it should be noted that the Island Plan's Built Environment Objectives (BE1(2)) sets out to support the development and regeneration of the Town of St Helier as the Island's principal centre providing land and development opportunities to provide for homes, economic activity and cultural needs. Again the proposed development would be against this.

As a result of the existing development of Tamba Park (for which a retrospective planning application had to be made) there has been a significant increase in traffic. This further development would lead to more vehicles.

It should be noted that from Carrefour Selous to Tamba is a "B" road. Despite this it is a major route for traffic to and from town. Driving down it and meeting other cars can be fine, or in some areas can result in a stop to pass, the banks are somewhat damaged and the road has been forcibly widened due to people pulling in. It is best if the buses meet in the widest sections, otherwise they have trouble passing. There are the existing delivery vans and tradesmen, plus being in the country, the tractors. This road is not designed to carry the traffic it does, never mind even more of it including more buses/coaches and more delivery vans.

It is noted that the Developer considers that bus access is inappropriate and accordingly intends to:

- move part of La Rue De La Frontière sideways,
- build a pavement 1.5m wide against La Sergente's bank so that north bound buses can drop off their passengers there,
- widen the road to 5m
- create a road crossing
- enable the above by removing part of a very good agricultural field together with the bank and existing trees
- build a pedestrian path in the field with banks either side.

The reason we do not, in this area, have a bus service like that of a town, or very busy area is that this is a quiet country parish. The developer's plans are to change all that and substantially change the nature of a country "B" road.

It should be noted that the Department for Infrastructure has responded with an Objection to this development as detailed in their letter of 16<sup>th</sup> August 2017

This will result in a substantial indent to a very good agricultural field, number 772. This already has a back door creeping alteration as it is habitually used as a grass overflow car park and over the winter for burning toxic rubbish. The un-burnt leftovers are still an eye sore in the field.

As cars and heavier vehicles use routes there is a resultant damage to the roads, which need to be maintained both by the States (main roads) and the Parish (lesser roads). This will result in extra costs to the respective parishes around Tamba Land.

The new development will further lead to greater visitors numbers - why else the increase in car parking and buses? If you have more people you get more noise, plus of course more cars with their associated noise and pollution.

It is noted that the application includes lighting requirement to ensure the security of the site. This light pollution will be seen for miles around, affecting both the immediate neighbours and others further afield.

Much has been made of the fact that the greenhouses were not in use immediately before their purchase. However, JAJ Properties Ltd/Tamba did not need to purchase them, nor to turn them into a storage facility for dinosaur parts and boats and then a theme park. The greenhouses themselves were not dilapidated and could still be used for crops, or converted to open agriculture.

During reviews of the Island it has been noted that “the agricultural industry has a major strategic asset, in its considerable land bank. It is self-evident that almost any business modernisation scheme could, in theory, be funded through the mechanism of obtaining development permission for non-agricultural development on part of that land. It should be equally self-evident that it would not be in the best long-term interests of the community to allow all and any such development to take place”.

In this instance, the glasshouses would be knocked down and the resulting agricultural field changed into accommodation and a car park. Nothing lasts forever as evidenced by, for example, the Strawberry Farm/Living Legend now being used for housing. This development of a holiday village will be a precursor to this agricultural land becoming a housing estate.

The Island Plan’s Green Zone Policy (NE 7) sets out a high level of protection from development in the Green Zone (Retreat Farm is in the Green Zone). NE 7 states that there will be a general policy presumption ‘against all forms of development’. The development of dwellings and the redevelopment of glasshouses are specifically listed as types of development that are not permitted as an exception to the presumption against development by policy NE 7.

The Proposed Development includes the creation of residential units and a shop and a gym. To improve profits, it would be unsurprising if they were then marketed to people outside of Tamba and its residents.

It is also noted that there is a mix in descriptions within the plans between the temporary/permanent nature of these houses. On the one hand, they are described as being “transient structures that can be relocated” because they are constructed on wheels, but, in reality, they are going to be hemmed in by the landscaping and made permanent by their concrete bases, connections to electricity, to sewage and water drainage/collection tanks.

There is again mention of using soakaways. [REDACTED] not allowed to replace [REDACTED] old soakaway due to the proximity to the water course leading to St Peter’s valley and the reservoir. There has also been flooding issues in the vicinity of the pumping stations on both Rue De la Frontière and Rue Des Varvots. In addition, I understand that the existing foul sewage infrastructure is not truly able to cope with the current level of use at times. It must therefore be substantially improved and capacity increased. I understand over a long distance of piping, to deal with any further development. Why should tax payers foot the bill for this, for a Developer’s profits?

The preamble to Policy ERE 7 - derelict and redundant glasshouses, at paragraph 5.159 states “... changes in the horticultural industry have led to many glasshouses becoming redundant and falling into disuse and dereliction. Many owners and growers have an expectation that development for other purposes will be permitted on the site. However, glasshouses are regarded as temporary structures related to the agricultural/horticultural use of the land and are subject to the normal policies of the countryside.”



Relevantly, when the RJA & HS was consulted on the draft Island Plan, their response included the statement that "Agricultural land should be of the highest priority, not born of selfish nostalgia, but out of a deep understanding that the Island's countryside is an important resource for the future." We have an ever decreasing amount of agricultural land and farming and agriculture are under threat.

If this development is allowed, it should have a condition that the land must be returned to agriculture in the event that the eco-friendly holiday homes cease to be a viable business. Further that to enable this, monies are put aside whilst a viable business is operating. This would avoid the frequent situation where a business ceases and it is claimed that the land cannot be restored/codicil complied with, due to lack of funds.

However, the Developer has not truly proven that there is sufficient justification to override the provisions of the Island Plan. Accordingly, this development should be rejected.

The Planning Minister has made it clear that he would prefer greenhouses to go back to open agriculture in their entirety as noted in the JEP article of 27<sup>th</sup> June 2017. However, in certain cases it might be appropriate to trade a house for the return of the rest to agriculture. This development gives nothing back to agriculture and should be rejected.

If the go ahead is given for the development of these greenhouses, what justification can be given for refusing others? Opposite Tamba there are other disused greenhouses that their owner wants to develop. How many additional houses will he build? Then again, around the Island there are so many sites that people are holding on to, allowing to become totally dilapidated with a view to claiming that the only thing possible is to develop them for housing. What Island do we want to leave to our children and future generations?

It should be noted that a precedent was set regarding the greenhouses at Grantez. At the conclusion of the Public enquiry into the demolition of those greenhouses and their development into housing Mr. Staddon BSc, Dip, MBA, MRTPI, the Inspector appointed, recommended that the Minister should refuse the planning application on the following three grounds:

- *The proposed building of eleven homes on this remote headland site conflicts with Island Plan policies to concentrate development in the built-up area.*
- *The development conflicts with the policy to establish a high level of protection from development of the Green Zone and specifically excludes the redevelopment of glasshouses.*
- *The applicant's 'enabling or linked development' case is not accepted, as the proposal fails to meet the required criteria of the policy.*

The development of Retreat Farm has many similarities and should also be rejected.

Yours faithfully



Miss A M Sinel

P&B SERVICES

22 AUG 2017

RECEIVED

Ref: Planning Application P2017/1073

Dear Sir

I would like to register my objection to the above application on Retreat Farm, Agricultural land.

As [REDACTED] neighbours to Retreat Farm, I would like to object strongly to the proposed Village. As stated on the many objections to the applications that have gone before this. The proposed Village would be on green land and would not be Legal, as it is supposed to returned to agriculture. if the greenhouses were no longer used. As [REDACTED] was aware of when [REDACTED] purchased the land.

[REDACTED] disturbed daily by the very loud music played by staff living [REDACTED] [REDACTED] I feel should this be passed, there would be no consideration to any neighbours, as it has been show throughout the time since [REDACTED] purchased the property/land.

I would ask the Planning Enquiry Committee to reject this application.

Yours sincerely

[REDACTED]  
Mrs Jenny Vautier





19th August 2017

For the attention of the Planning Minister  
Planning & Building Services  
States of Jersey  
St Helier, Jersey, JE2 4US

Dear Minister, Planning Department and Member of the States of Jersey

**Re: Application P/2017/1023 - Self Catering Lodges - RETREAT FARM**

I would like to object to the above planning application.

I have never had any issues or problems in any way for the previous 15 years that I have lived near to the Lion Park, from the Lion Park or any of my neighbours. Since Tamba Park has been running there has been continuous problems and issues. Despite many people in the surround area of the Park trying to reach amicable solutions with the Park   
 they carry on regardless with little regard for the surrounding area, wildlife and neighbours.

The proposed location of this application is Green Zone, our Jersey Country side.

I appreciate that because we are a growing Island, with the population increasing and there is an ever growing need for development.

However this application is not just development, it is a major scale development that covers a large area of our green zone country side.

Regards



Jonathan De La Haye

1 SERVICES  
- 7 SEP 2017  
CIVIL

5th September 2017,

Dear Mr Luce,

I am deeply concerned that it has been deemed necessary to bring in a UK Planning Consultant with regard to [REDACTED] proposed development of Tamba Park.

Tamba Park lies within the green zone, where there is the presumption against development. These laws were put in place to protect the countryside and its wildlife, not only for our, but for future generations. We, as a society have a duty to ensure this is done. The application should therefore be refused.

[REDACTED] clearly believes that by pursuing multiple applications, [REDACTED] will ultimately succeed. He will doubtlessly claim that the proposed properties will be a valuable asset to tourism, yet within a few years, they will almost certainly be permanently let, if not sold.

If such accommodation is required by tourism, might I suggest that you return properties like the Fisherman's Cottages at L'Etacq, which were given planning permission

on the premise that they were for holiday lets,  
to the tourism portfolio. It is a similar example  
of an area that should never have been built or  
being used for financial and personal gain by  
a property developer under the thinly veiled  
guise of being an asset to tourism. Within a  
few years they were all permanently let - to the  
detriment of the area.

Yours sincerely,

Anne Jancey.

Kate Motley



P&B SERVICES  
5 SEP 2017  
RECEIVED

31<sup>st</sup> August 2017

For the attention of the Planning Minister  
Planning & Building Services  
States of Jersey  
St Helier, Jersey, JE2 4US

Dear Minister, Planning Department and Member of the States of Jersey

**Re: Retreat Farm - Application P/2017/1023 - Self Catering Lodges**

I am writing to object to the above application.



is important to me that my objection is noted.

"SP1 of the Island Plan states that development will be concentrated within the Island's built up area and planning permission will only be given for development *"appropriate to the coast or countryside"*. The proposed development is in one of the most remote, underpopulated, and rural parts of the countryside. It will, unquestionably, destroy the rural identity and character of the surrounding area.

SP2.24 states that *"the Minister for Planning and Environment will seek to protect these countryside assets from inappropriate and non essential development. The guiding principle for development here is a general presumption against development, for whatever purpose, except were a coastal or countryside location is essential, combined with the objective of redirecting this development towards existing settlements"*. I recognise that there may be considerable political pressure on the Minister to agree to the development by, for example, tourism. But the island plan is designed to protect the island – the development runs contrary to the plan and it is counterintuitive to undermine the beauty of the island (and ride rough-shod over the island plan) in order to facilitate tourism, when tourism trades on the beauty of the island. The development is not 'essential', far from it. And lets not be under any misapprehension – those behind the development application are not promoting the island. They are seeking to generate profit and make money. It is pure commerce and the applicant is seeking to exploit the beauty of the island for personal gain.

E5.137 states that *"the Jersey countryside is one of its most prized assets, but the limited supply of land in the Island has resulted in it being subject to considerable pressure for development ...development includes housing and demand for tourism and leisure activities. All of these, to a greater or lesser extent can threaten*

*landscape character and biodiversity and require careful control while meeting the needs of the Islands residents*". The same point arises as that which is made above – tourism trades on the beauty of the island. Yet the development will have an extraordinary, and detrimental, impact on the area. Moreover, the island plan is to protect the island for the residents. Whereas the intention behind the development is for tourists which will be primarily from outside the island.

NE7 provides for a high level of protection from development in the Green Zone and there is a general policy presumption against all forms of development. New developments should not cause serious harm to landscape character. The proposed development is not essential development in the Green Zone countryside of St Mary and St Lawrence. Moreover, the area in question, more than many other areas in the island, will suffer for the very reason that it is so rural. To plunk a substantial development in the midst of one of the most rural parts of the island, to my mind, cuts across the *raison d'etre* of the island plan.

The cynic in me wonders if the multiple applications in recent years have all been deliberately designed as part of a campaign which started with smaller and less controversial applications – the archetypal 'thin end of the wedge' – leading to what will ultimately be a wholesale and massive development which bears no resemblance to the original 'stated' intentions of the site owner. I feel we may now be at the fat end of the wedge. And even if the campaign of applications was not a contrived process to achieve the ultimate end-game of a substantial development, the effect is the same.

Tamba Park provides a service, and much needed leisure activity, to the islanders as a whole in its current form. It is not ideal for the residents in the area, but it is nevertheless a fair compromise between impact on the environment, noise pollution, traffic, and impact on the rural nature of the surrounding area. Perhaps the business is not producing the profits that the owners would like, thus driving a change of heart, perhaps the application is the culmination of a contrived scheme leading to a big development and large cash-gains for the owners, perhaps the owners just want more money and want to exploit the land further. But whatever the reasons behind the multiple applications, what is clear is that the new application is a completely different concept to Tamba Park and it goes way beyond what was envisaged when Tamba park was opened and when it secured its initial planning consents.

A brilliantly written letter and one which I whole heartedly back and agree with. Please take this into consideration. It is such a small Island and the countryside is so valuable. When will enough be enough?

Yours sincerely

Kate Motley



Ref: PDJ/7716594

30 August 2017



For the attention of the Planning Minister

Planning & Building Services  
States of Jersey  
St Helier  
Jersey  
JE2 4US

Dear Sir/Madam

**Re: Retreat Farm - Application P/2017/1023 - Self Catering Lodges**

I am writing to object to the above application. I understand that I may be technically out of time, [REDACTED]

[REDACTED] I sincerely hope that my objections will nevertheless be taken into account given the serious impact that the application (if granted) will have on the environment.

The island plan

SP1 of the Island Plan states that development will be concentrated within the Island's built up area and planning permission will only be given for development "*appropriate to the coast or countryside*". The proposed development is in one of the most remote, underpopulated, and rural parts of the countryside. It will, unquestionably, destroy the rural identity and character of the surrounding area.

SP2.24 states that "*the Minister for Planning and Environment will seek to protect these countryside assets from inappropriate and non essential development. The guiding principle for development here is a general presumption against development, for whatever purpose, except where a coastal or countryside location is essential, combined with the objective of redirecting this development towards existing settlements*". I recognise that there may be considerable political pressure on the Minister to agree to the development by, for example, tourism. But the island plan is designed to protect the island – the development runs contrary to the plan and it is counterintuitive to undermine the beauty of the island (and ride rough-shod over the island plan) in order to facilitate tourism, when tourism trades on the beauty of the island. The development is not '*essential*', far from it. And lets not be under any misapprehension – those behind the development application are not promoting the island. [REDACTED]

E5.137 states that "*the Jersey countryside is one of its most prized assets, but the limited supply of land in the Island has resulted in it being subject to considerable pressure for development ...development includes housing and demand for tourism and leisure activities. All of these, to a greater or lesser extent can threaten landscape character and biodiversity and require careful control while meeting the needs of the Islands residents*". The same point arises as that which is made above – tourism trades on the beauty of the island. Yet the development will have an extraordinary, and detrimental, impact on the area. Moreover, the island plan is to protect the island for the residents.



Whereas the intention behind the development is for tourists which will be primarily from outside the island.

NE7 provides for a high level of protection from development in the Green Zone and there is a general policy presumption against all forms of development. New developments should not cause serious harm to landscape character. The proposed development is not essential development in the Green Zone countryside of St Mary and St Lawrence. Moreover, the area in question, more than many other areas in the island, will suffer for the very reason that it is so rural. To plonk a substantial development in the midst of one of the most rural parts of the island, to my mind, cuts across the *raison d'être* of the island plan.

[REDACTED]

Tamba Park provides a service, and much needed leisure activity, to the islanders as a whole in its current form. It is not ideal for the residents in the area, but it is nevertheless a fair compromise between impact on the environment, noise pollution, traffic, and impact on the rural nature of the surrounding area.

[REDACTED]

But whatever the reasons behind the multiple applications, what is clear is that the new application is a completely different concept to Tamba Park and it goes way beyond what was envisaged when Tamba park was opened and when it secured its initial planning consents.

Yours sincerely

[REDACTED]

Damian P James

## Application Comment

Reference: P/2017/1023

### Comment Date

01 September 2017 09:26:26

### Comment Author

First Name: Mark and Jane

Last Name: Juste

Address Line 1:

Address Line 2:

Address Road:

Address Town:

Address Parish:

Address Postcode:

Email Address:

### Comment

We would like to object to the planning application as it does not comply with many policies contained within the Island Plan.

[REDACTED] they would be very badly affected by the noise and light pollution that would be created, as would, of course, the wildlife living in this very rural area. We have come to know several people who own properties very close to Tamba Park and they are continuously affected by unreasonable levels of noise from the park. This would presumably escalate massively if there are approximately 100 people staying in the proposed houses. How would the noise and light created be policed and maintained at a decent level for the local wildlife not to be affected?

We would, again, mention the issue of the drainage problems. We first raised our worry about additional stress being placed on the pump station on La Rue des Varvots on an application made by Tamba several years ago to build houses. Unfortunately the person responsible at TTS at that time did not look into the situation properly and did not object. Permission was granted to build several houses, which were sold by the applicant for a large profit. Our objection letter had fully explained the problems we had experienced with raw sewage being forced up through drains in our garden and being unable to flush our toilet. We find it extremely disconcerting that the applicant and his architects are submitting further building applications, when they are fully aware of the existing problems. The Department for

Infrastructure have very clearly and strongly covered this subject in their objection consultation document on this application.

We feel strongly that the developer was aware of [REDACTED] obligation to return the greenhouses to agriculture if they were no longer to be used for their original purpose.

The roads around the entire park are unsuitable for the level of traffic the park currently creates. Further development would only make the current issues far worse. The roads were just about adequate for previous businesses, as they were not as busy, however, the volume of traffic now is ludicrous. [REDACTED]

[REDACTED] When we drive to see her, we often cannot even drive into the house driveway, because of the number of cars trying to drive into the park, coming from the opposite direction. [REDACTED]

[REDACTED] it will cause most of the entrance to La Rue des Varvots to become single lane traffic. [REDACTED]

We do hope the Planning Committee reject the three applications being made and allow this lovely part of St Lawrence/St Mary to remain rural countryside.

End Comment

[REDACTED]

---

**Subject:**

FW: Tamba Park

-----Original Message-----

From: Jenny Dickson [REDACTED]

To: [REDACTED]

Sent: Tue, 2 Jan 2018 10:02

Subject: Tamba Park

The article in the Evening Post states that the planning application is for 27 two and three bedroom self catering apartments. This would be out of place in the green zone.

If any permission for development is given, it should be for low rise Ecco lodges, well camouflaged with plenty of planting and trees.

Mrs J. Dickson

[REDACTED]

## Application Comment

Reference: P/2017/1023

### Comment Date

06 December 2017 11:40:02

### Comment Author

First Name: Christopher

Last Name: Bee

Address Line 1:

Address Line 2:

Address Road:

Address Town:

Address Parish:

Address Postcode:

Email Address:



### Comment

Seems to me that The Island Plan is thought up and then pretty much carved in stone.

A plan that is drawn up months and years in advance can not react to the current speed of change . The Island plan did not anticipate terrorism, BREXIT or a turn in offshore financial fortunes.

Any bias given to an ideological plan that ignores the current climate and needs of Jersey would be short sighted.

In the case of Tamba, as I understand it, these glasshouses were not built on greenfields, but inches of concrete - that will never be dug up to return the area to agriculture or 'green' use - it was (and is) more akin to industrial use. There was even a polystyrene manufacturing plant on the site - hardly green!

I am not belittling the principle of protecting Jersey's beauty - but this site is far from beautiful and it is unlikely, without some major investment that it ever will be.

██████ appears to be one of a very few who is prepared to invest in 'a', maybe not 'the' future for Jersey. Lets not focus on a single dwelling ██████ would like to build to offset the costs, lets focus on the benefit to tourism and the visual improvements to the area - just look at Les Ormes - it is a successful and tranquil environment.

## Application Comment

Reference: P/2017/1023

### Comment Date

06 December 2017 12:20:25

### Comment Author

First Name: Amanda

Last Name: Huson

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### Comment

I think the Tamba Park development is a really good idea. It will attract tourism to the island as well as give islanders somewhere to go on a weekend. As the sight is currently filled with old greenhouses it seems a shame to leave the site wasted like this.

End Comment



20<sup>th</sup> December 2017

Reference: Retreat Farm

To whom it may concern

Having been involved with the production and sale of Jersey Royal potatoes for over 40 years and having been MD of the Jersey Royal Company from its inception until 2014, I have been asked to express an opinion on whether the glasshouse unit at Retreat Farm is suitable/viable for the growing of Jersey Royals.

I am familiar with Retreat Farm and therefore aware that much of the floor area is concrete and that several areas contain other fixed infrastructure.

The production of glasshouse Royals is marginal at the best of times, given that the seasonal nature of retail market values only allows for the production of one crop per year. In this instance, incurring the additional cost of concrete removal and other fixed infrastructure, in order to reinstate soil, would be so costly as to render the growing of Jersey Royals financially unviable.

I have also been asked to comment on the growing of Jersey Royals in 'grow bags' or 'raised beds' on the concrete floor; from a viability point of view this can best be described as preposterous. The fact that I have never encountered this as a method of production probably speaks for itself. No grower would even contemplate doing this because they know it would be unviable from the outset.

I trust the information above will be of some use

Yours sincerely

Tom Binet