

## NOTES FOR FINAL SUBMISSION

- We have clearly demonstrated that there are alternative potential sites to Field 622. such as Fields 585 and 631 amongst others. For these two we know the owners are potentially willing sellers. We would contend that the process for identifying alternative sites was flawed and should have prioritized sites by the then categorizations of Brown Field, Countryside and finally Green Zone.
- Mr Thorne and Mr Morris dismiss the relevance of the loss of agricultural land. However it is imperative that the Island continues to preserve its agricultural land bank. This is supported by the Ex President of the Jersey Farmers Union and Mr James Godfray, the Chief Executive of the Jersey Agricultural & Horticultural Society.
- The proposed application is in direct contravention of a number of sections of the Island Plan 2011, as stated by Mr Coates and Mr Lees-Baker in their respective statements.
- Mr Thorne submits that the project meets an identified local need evidenced through the Housing Gateway. This has been shown to be misleading and irrelevant to the particulars of this application.
- The Parish authority has singularly failed to support the application and requirement by means of a Village Study or Plan despite recommendations by the Planning Department and relevant policies.
- The evidence of factual, relevant and accurate demand has not been presented to this enquiry. Therefore the number of dwellings being applied for has no substance or credibility based on fact. There is also evidence that the number of dwellings being applied for is not based on demand but on the amount of money the Parish was bequeathed.
- With regard to the States of Jersey report 'Residential Land Availability' January 2012 – the report clearly highlights that demand for such dwellings in Jersey has already been more than satisfied by supply, with an excess capacity of undeveloped units of 170.
- The Parish was unable to present a clear and concise definition of the criteria that the Parish demands for an applicant seeking sheltered housing.
- Morris Architects state they do not believe that the Field is of historic interest. Jersey Heritage categorically state otherwise. We would submit that an organisation dealing with historical matters are best placed to comment on this.

- Morris architects state the development should have no effect on the marsh area. As demonstrated by Mrs Martens Radomski 'should' is an insufficient argument for progressing development in a sensitive area.
- Jersey has ratified the International Convention on Biological Diversity. Jersey is also included in the European Landscape Convention. It was suggested that to conduct an environmental study whether required under Jersey regulations or not would at the very least have been prudent practice by any developer.
- Morris Architects have explained that foul drainage on the development will be via gravity to the west side of the site. They have not advised or confirmed if the Trustees of the Ecclesiastical Trust, which owns that part of Field 622, are aware of this. We would urge the Inspector to check with Government House Office if they are aware of this?
- Morris Architects advise that the mystery road leading into the western part of Field 622 is now for quote 'visual purposes'. This is in conflict with the two explanations given by the previous Constable Mr Vibert. Perhaps the applicants should clarify their own plans.
- Morris Architects suggested the funding for the project was not relevant to the application. We would submit that without clear evidence and detailed knowledge of the funding available, the application and plans become untenable. This inquiry has not heard any financial details.
- What is relevant to the funds applied to the project so far is that had the Parish conducted, managed and co-ordinated matters in a more efficient manner and followed due process and advice, it is almost certain that the money expended so far would have been greatly reduced.
- As per Mr Coates statement, the application does not fully comply with the policies encouraged by Policy H5, reiterating yet again the lack of a Village Plan.
- The traffic and access issues have been presented and discussed at length. What remains the case is that Rue de la Croute is a narrow country lane suitable only for single lane traffic with a very sharp right angle turn half way down it, which proves difficult for larger vehicles. In addition the two exits onto primary roads are difficult for competent drivers. It should be noted that this proposed development would increase the traffic flow within the road and junctions by a significant number. Many of these drivers by nature of the development will be elderly. Therefore the access onto primary roads should be of the safest standard possible.
- The protection of the marsh cannot arbitrarily be brushed aside. It would be irresponsible of a Parish authority to proceed with a development that may, in fact almost certainly will, have a detrimental effect upon this environmentally

sensitive area. We would refer to the Ombudsman Panel in 1976 which insisted that there should be no further development west of the eastern boundary of Field 622 as a buffer zone for marsh.

- What needs to be stressed is that had the Parish at the very start of this whole project back in 2007 adopted an open, fully transparent and constructive approach, proceeded according to the due processes, policies and advice given, investigated thoroughly and completely less sensitive sites and interacted overtly with its Parishioners, Mrs Coulter's generous bequest would probably by now born fruit.
- Mr Inspector in our opinion, we all as a group of objectors, would reject the proposal on the basis that it is Green Zone and it would mean a loss of agricultural land and could have a serious detrimental impact on the adjacent Marsh. In addition to this, as you will have heard from each of us, in our opinion due process has not been followed with this application and as members of the public we have not been afforded the same privileges or rights as the Parish has. We are extremely unhappy with the way this has been handled by the Parish of St Ouen.
- This application is flawed, poorly researched and whilst the objective of securing housing which should be for the elderly and we repeat elderly, is a laudable objective, it should be applied to an alternative less sensitive area and rejected.