



PLANNING & ENVIRONMENT DEPARTMENT

Draft Island Plan – White Paper
Natural Environment
Minister's Response to consultation
27th May 2010

Ref	Agent	Name	Org/bus.	No.	Title	Response	Suggested changes to the document:	Why you consider this to be necessary:	General Response	Detailed Officer Response	Minister's Recommendation
Historic Environment											
DP1110		Mr Ben Ludlam	C Le Masurier Ltd	3	Historic Environment	Objecting		The general detail on Historic Buildings in the document is not clear and 3.9 suggests a single Listing class. This is now subject to a separate consultation and to which we have sent comments. The Listing of Historic Buildings needs to be review in its entirety with a greater degree of detail / consideration for each specific building.	Reject	This is a comment on the review of the historic environment protection system, which is under review, and not on the policy framework to be provided by the Island Plan. The issue raised will be considered as part of the HE Review.	The Minister is minded to amend the draft Plan as a matter of course to reflect the progression of the review of the historic environment protection regime, which has been approved for implementation following supportive consultation.
DP292		Mrs Penelope Lee		3	Historic Environment	Supporting			Noted	Noted	Support is noted by the Minister
DP393		Mr Nicolas Jouault		3	Historic Environment	Neither	In some cases it is difficult to find out or interpret the classification and protection a building has, for example the harbours are historic buildings but they are not treated as such, much of the character of the Albert pier has been lost to carter for the need to place modern buildings on or along side it, where was the protection there? Some historic fabric comes to light during a development more effort and manpower should be employed to record such things that are going to be lost for ever.		Noted	The comments made about classification are relevant to the review of the historic environment regime, which is ongoing. Any heritage asset, designated as such, where it is affected by development proposals would fall to be considered under the policy regime set out in the draft Plan, and where there would be a presumption against the loss of historic fabric, including harbours. It needs to be recognised, however, that the value of heritage is one consideration in the determination of planning applications. Policy HE1 and HE5 include provision for recording and publication of findings where historic fabric is to be lost or damaged as a result of development activity.	The Minister notes the comments but is noted minded to amend the draft Plan as the issues are adequately addressed
DP407		Mr Antony Gibb		3	Historic Environment	Neither	Please ensure that issues to do with historic built environment follow current UK thinking as set out in PPS5, which replaces PPGs15 and 16.	To ensure that Jersey policy does not lag behind current UK thinking.	Noted	The Minister and the department is cognisant of the changes being introduced in the UK and is monitoring these relative to the ongoing review of the historic environment protection regime in	Noted by the Minister

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										Jersey	
DP560		Deputy John Le Fondre		3	Historic Environment	Neither	<p>Historic Environment - the historic environment mainly seems to apply to historic buildings which would seem logical. However I think there should be some form of recognition and protection for some of our historic footpaths. For example, there are a number of sanctuary paths, there is the Corbiere railway walk, I am aware of at least one chemin des morts (to the churchyard), and some mill paths. In certain cases ownership is clear, and is subject to covenants, in other cases it is not. This is not about controlling access - a number of these paths are (rightly) multi use (pedestrians, horse riders and cyclists), and such multi use should continue. However to me, over time, there is always some threat over eroding the tranquillity / utility of such routes. For example by the potential threat of allowing private developers to cross such paths in order to gain better motor traffic access to a site, or for some other purpose. Therefore should there be some form of protection granted to such routes to ensure that the value of such routes is not lost over time?</p>		Noted	<p>Not necessarily an issue for the policy framework of the Island Plan as it is more related to whether or not these routes ought to be designated as heritage assets (and thus be subject to the policy regime relating to the historic environment). However, designating such features as individual sites poses some challenges: taking the examples given - the sanctuary paths (perquages) are believed to have run from each parish church to the coast - mostly following streams in a southerly direction. Some of these paths run for miles from the north of the island but the exact routes are open to debate - there are small stretches still called the Perquage e.g. Castle Street. There also remains the issue as to why protect just these features? Whilst they are undoubtedly of historic interest, the same would apply, perhaps with greater cultural significance, to the island's early road network, old railway lines and mill paths, some of which may be older and which may have had a more significant impact on the historical development of the Island. There are some streets with early road surfaces that are designated and protected because of their historical significance e.g. Waterloo Lane and Hilgrove Street (although the latter now questionable) and there may be a case for other early road surfaces. But if we protect the routes of old paths, why not the banques and fosses and field boundaries - some of which may date to the Bronze Age? A more appropriate response may be the undertaking of an Historic Landscape Assessment to identify and understand the historic</p>	The Minister notes the comments made but is not minded to amend the draft Plan.

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										development of today's landscape - emphasising the contribution that past historic processes make to the character of the landscape as a whole, not just selected 'special sites' which would help to guide decisions on future change and management on a more informed basis. This is an emerging area of policy development in the UK which will be kept under review. Notwithstanding the above, any such routes that are part of the Island's footpath and cycle network would be protected, relative to their function in providing access, under Policy TT1.	
DP678		Mrs Sue Lissenden		3	Historic Environment	Neither	In all the words written about archaeology, nothing is said about the huge volume of work already undertaken by the Societe Jersiaise, most of it at a time when there was no governmental involvement at all. This is mean-spirited. There is a reference, later but not specific, to stakeholders, and it might be supposed that would include the Societe, but it does not say so.		Noted	The considerable role of the Societe Jersiaise in contributing to the knowledge of the Island's archaeology is fully acknowledged in the Supplementary Planning Guidance Note: Archaeology and Planning (January 2008)	The Minister notes the comment but is not minded to amend the draft Plan
DP737		Paul Harding	The Association of Jersey Architects	3	Historic Environment	Objecting	7.1 Whilst fully appreciating and supporting the need to take special care of our historic built inheritance, several AJA members expressed the view the section on Historic Environment section has now become overly restrictive in its policies towards old buildings.	There is a perception an antidevelopment culture now predominates in case of historic buildings, making them immune from the worldly concerns and pressures that the rest of the Island Plan seeks to address ? ie: planning for future development. It is obviously important that the section on Historic Environment does not exist within a vacuum and some acknowledgement of this within the wording of the new Island Plan would be helpful.	Reject	The principles upon which the strategic approach to the historic environment are soundly based and reflect the Minister's and the States obligations, as set out through law, international convention and the States Strategic Plan. The Plan explicitly acknowledges, in 3.3-3.6, the need for change and the potentially adverse implications of this, in some cases, for historic fabric: the starting point, however, is that there ought to be a general presumption against the loss of heritage assets as they represent a finite and irreplaceable resource.	The Minister is not minded to amend the draft Plan.
DP760		A H Harris		3	Historic Environment	Neither	Importance of honouring our heritage Not only should we ensure that our important buildings are protected, we should also ensure that they sit in an appropriate setting. Where a Church or an SSI sits amongst green fields, every effort should be made to preserve the setting. Where a property is designated as an SSI, I believe all elements of the		Noted	The setting of heritage assets is specifically recognised and identified as a material consideration in Policy HE1 and Policy HE3, relating to Conservation Areas, seeks to ensure that character and	The Minister notes the comments made but is not minded to amend the draft Plan as the issues raised are

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							listing should be carefully noted and included within the Notice. If the listing includes perimeter walls this should also be recorded and included on the Notice. Any important trees that add to the scene should be the subject of a tree preservation order. It is not enough to expect a dynamic or unwitting developer to understand exactly what is included without specifically saying so. The planning department can therefore expect any element omitted to be extremely vulnerable. Once a tree has been felled or a wall demolished it is too late, and everyone, especially the developer, knows this.			appearance of an historic area, designated as a Conservation Area, is also considered and protected. The issue of defining those items of interest on an SSI schedule is noted but is not material to the Island Plan itself but is more relevant to the process of Listing.	already addressed
DP293		Mrs Penelope Lee		Objective HE 1	Historic Environment Objectives	Supporting			Noted	Noted	Support is noted by the Minister
DP81		Mr Stephen de Gruchy		Objective HE 1	Historic Environment Objectives	Supporting			Noted	Noted	Support is noted by the Minister
DP294		Mrs Penelope Lee			Buildings and Places of Architectural and Historic Interest	Supporting			Noted	Noted	Support is noted by the Minister
DP418		Mr Marc Burton	Institute of Directors		Buildings and Places of Architectural and Historic Interest	Supporting	The IoD members strongly support the need to review the island's listed buildings and buildings of special interest with a view to opening up some sites for development and creating much better and clearer policy for designation of such sites going forward; See attached letter		Noted	Whilst not an issue for the Island Plan, an integral element of the Review of the Historic Environment Protection Regime is a comprehensive re-survey of all existing and potential heritage buildings and sites in Jersey, to be undertaken under the auspices of a revised designation system. This should ensure that only those buildings and places worthy of protection are protected and that the reasons for their protection are clear and accessible. This work is scheduled to take place, subject to the availability of resources, in 2010-2011.	The Minister notes the comments but is not minded to amend the draft Plan
DP1036		Ray Shead	The Jersey Chamber of Commerce	Policy HE 1	Protecting Buildings and Places of Architectural and Historic	Objecting	Some members would like to see a total review of all Listed Buildings. Some flexibility needs to be introduced into this policy. There are buildings in a very poor state of repair that would benefit from deregistration, particularly where they are stopping any further development of a site. Internal equipment that has no benefit should not		Reject	Whilst not an issue for the Island Plan, an integral element of the Review of the Historic Environment Protection Regime is a comprehensive re-survey of all existing and potential heritage buildings and sites in Jersey, to be	The Minister is not minded to amend the draft Plan

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					Interest		be listed. It is agreed that there should be a strict process of recording of fabric and internal fittings prior to demolition. This policy should not hinder The Planning Minister's intention to regenerate St Helier.			undertaken under the auspices of a revised designation system. This should ensure that only those buildings and places worthy of protection are protected and that the reasons for their protection are clear and accessible. This work is schedule to take place, subject to the availability of resources, in 2010-2011. This policy is flexible. The state of a building is not material to a decision about whether it is of heritage value (e.g. Grosnez Castle). The viability of the beneficial re-use of a heritage asset is, however, material to the determination of a planning application which might affect the historic fabric of a designated building. The starting point, however, always ought to be a presumption against the loss of heritage assets. Where the interior of a building is of special interest, it is appropriate to highlight the significance of this part of the asset and to consider it in the development process. Where the retention of interior features, fixtures and fittings might unduly constrain the beneficial re-use of an historic building then the Minister should weight the public interest and value of their retention against the potential community benefit of any proposed development. The policy enables the Minister to do this.	
DP295		Mrs Penelope Lee		Policy HE 1	Protecting Buildings and Places of Architectural and Historic Interest	Supporting			Noted	Noted	Support is noted by the Minister
DP462		Mr Charles Alluto	The National Trust for Jersey	Policy HE 1	Protecting Buildings and Places of	Neither	The Trust would like to suggest that the definition of historic fabric is widened to include internal fittings, decorative schemes, as well as external items such as railings and gates etc.		Noted	The Minister is able to exercise control over works, whether they amount to development or not, where they have the potential to	The Minister notes the comment but is not minded to

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					Architectural and Historic Interest					adversely affect the special interest of a building or place, where that building or place is Listed. Thus, proposals affecting any historic fabric deemed to be part of the special interest of the building or place can be regulated. The definition offered is not meant to be comprehensive.	amend the draft Plan as the issue is adequately addressed
DP702		Mr Mark Syvret	Romerils	Policy HE 1	Protecting Buildings and Places of Architectural and Historic Interest	Objecting	[Page 46; section 2.53] makes reference to conservation and sustainable economic growth being complimentary objectives and should not be seen as being in opposition to one another. In addition economic prosperity can secure continued vitality and the continued use and maintenance of historic buildings, we SUPPORT these arguments, if exercised pragmatically. However it is with regret that this has NEVER been the practical outworking in our experience with the BLi listing of the facade of our Dumaresq Street building. We fear that the categoric and inflexible wording used in the Draft Island Plan will be catastrophic for the future use of this particular building. Our comments are specific to the BLi listing on the Romerils building; however, the logics will apply to other commercial listings. [Page 115 section 3.9] states that there will be one form of site specific designation in the form of a site of special interest. Therefore we presume that all current listings will be governed by [Page 119; Policy HE 1.] [Page 119; section 3.19] "It should be noted that controls apply to the whole of a protected site, not just the front elevation or the main building." Currently the Romerils building has BLi status for the facade only, so in future the whole of the site and not just the front elevation will be listed and in conjunction with [3.16] we would be expected to use traditional materials. In essence this is a 1960's and 1970's cheaply constructed builder's merchant shop and warehouse. Whilst the facade listing is questionable, it is incomprehensible that the rest of the site would then be listed. While we can see a logic to preserve genuine historic buildings, in this instance the wording is far too absolute, inflexible and economically unworkable. Furthermore under [Policy HE1.] "permission will not be granted for the total or partial demolition of a protected building." Therefore none of these buildings in the Dumaresq Street and Hue Street area will ever be demolished nor will there be an		Reject	The extent of protection for existing historic buildings relates to the whole structure presently: the draft Island Plan is proposing no change in this respect (see existing supplementary planning guidance Managing Change in Historic Buildings. pp.5). Also, there already exists a presumption against the partial or total demolition of a protected building (see G13 of current Island Plan.). What is important, however, is the extent to which any proposed change affects the particular interest of an historic building, including the integrity of the original design. Buildings of Local Interest (BLIs) are essentially designated because of their townscape value i.e. because of the contribution of their external appearance, architectural quality and historic character. In the case of the Romerils building, it is clear that the front of the building is of most interest in this respect. In assessing any particular proposals for change at Romerils, particular attention will therefore be paid to the impact of any change upon the front elevation in particular. Other proposals will also be assessed for their impact upon this particular aspect of the building: where there is no significant harm caused to the particular historic/ architectural interest of the building, then each proposal, will be assessed accordingly. On this basis the	The Minister is not minded to amend the draft Plan

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							<p>opportunity for any betterment in this rather run down, scruffy part of town. The life expectancy of these cheaply constructed buildings is nearing the end and it is questionable how much longer Romerils will be able to keep this business viable from this location, but under this proposed wording it will have to remain as it is in perpetuity. This cannot be logical nor the outcome you de sire . Sadly, our experience of the current working approach of the department is inflexible, so it can only deteriorate with the new "enhanced" proposals. To give one example: We, as the client, are unable to meet with planners to discuss this building with our architect. Our architects have to meet planners on one occasion entirely separately from the client. There cannot be a better piece of evidence for such an outmoded, illogical approach, which contradicts [Page 46; section 2.53] B.G. Romeril & Co. Ltd as an organisation have always supported Jersey Government. Furthermore I am not given to emotive language like that which has just been used and is evidence of the frustration , anger and deep concern with which this proposal is being viewed. We therefore O.B.J.E.C.T to [Page 115; section 3.9, Page 11 9 section 3.19 and Page 11 9 Policy HE 1.] Suggested change: A complete rethink on the attitude and approach. Delist the Romerils building. In the interest of clear open constructive Government, I am both surprised and disappointed that these historic building proposals have not been individually sent to each owner of a listed building, they are so dramatic and far reaching that it is inadequate to have left them as single sentences within a body of a document of in excess of 500 pages.</p>			existing and proposed policy regime retains an appropriate level of flexibility to accommodate change, whilst ensuring that the particular interest of a building, is safeguarded.	
DP818		Mrs Susan Kerley		Policy HE 1	Protecting Buildings and Places of Architectural and Historic Interest	Supporting	I endorse the suggestions and comments made by the National Trust for Jersey on these policies and proposals		Noted	Noted	Support is noted by the Minister
DP82		Mr Stephen de Gruchy		Policy HE 1	Protecting Buildings and Places of Architectural and Historic Interest	Supporting			Noted	Noted	Support is noted by the Minister

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DP392		Mr Mark Renouf		Policy HE 2	Protection of Historic Windows and Doors	Supporting	<p>I wish to see a number of changes to policies on windows and doors. The insensitive and ignorant replacing of period windows in particular has ruined the island's built environment in the last 30 years. Fine Georgian buildings in Rouge Bouillon have been ruined by a hotpotch of plastic windows. Elsewhere, townhouses and country farmhouses have been ruined even in recent years by hideous flat plastic windows. The essential architectural feature of window shutters is mostly missing. I have never been particularly aware of prosecutions. What we need to do is to put the onus on the window replacement companies, with hefty fines for breaches of more stringent regulations, so that the cost of policing is removed from the state to those profiting. Nothing will enforce careful compliance than a £50,000 fine on the window company. We also do not need to accept defeat on houses that have been modified - if people want planning permission for changes on their property, they should be expected to restore features which have been removed, by replacing wooden doors, windows and shutters with appropriate replicas. I am concerned that it may not be enough to restrict policies to listed buildings: any post war building may need to be covered in some way. It may be that for some categories or ages of building (eg. non listed buildings prior to 1945), some sort of private sector certification could suffice to avoid burdening the planners with a formal planning permission application. ie: lay down clear guidelines and allow architects to certify that replacement windows are appropriate for the period of building (subjecting those architects to keep records and photos and be vetted occasionally to ensure they are adhering to the rules, otherwise risk losing certification status). It is not that difficult to determine what is an appropriate window or door for a particular period of property - what we need is to stop the free for all of ignorance which is currently ruining our island. In England, in the isle of Purbeck, Cotswalds etc, they have preserved the character of buildings. There is no excuse in Jersey where land costs are much higher, and incomes higher, for the bodged environment we now have to endure looking at. The approach also needs some flexibility, though. We need to consider how double glazing can be facilitated at an appropriate grade of building. I understand that Mumford and Wood can supply double glazing with replica</p>	<p>Our existing building stock is a far greater percentage than new builds will ever be, and it is vital to restore what we have properly, if we want to dramatically change the look of our built environment.</p>	Noted	<p>The prosecution of planning infractions is a matter for the Attorney General. Policy HE2, supplementary planning guidance and the approach adopted by the department, seeks to ensure the replacement of modern windows with sympathetic historic fittings in historic buildings. The introduction of Conservation Areas in Jersey, together with the relevant and associated change to the General Development Order, should ensure that control over the proposed replacement of historic windows and doors is extended to buildings that are not listed but are located within the designated Conservation Area.</p>	<p>The Minister notes the qualified support for this policy</p>

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							traditional (ie: rippled) glass. Slimlite glass can actually be retrofitted into existing Georgian frames, retaining the classic thin profile of the glazing bars. Too inflexible an approach may condemn our historic buildings to be shunned in future, with rising fuel prices and environmental restrictions on use of energy - we do need to be careful to strike a balance.				
DP463		Mr Charles Alluto	The National Trust for Jersey	Policy HE 2	Protection of Historic Windows and Doors	Supporting	The Trust fully endorses and very much welcomes the objective of protecting historic windows and doors.		Noted	Noted	Support is noted by the Minister
DP819		Mrs Susan Kerley		Policy HE 2	Protection of Historic Windows and Doors	Supporting	I endorse the suggestions and comments made by the National Trust for Jersey on these policies and proposals		Noted	Noted	Support is noted by the Minister
DP83		Mr Stephen de Gruchy		Policy HE 2	Protection of Historic Windows and Doors	Supporting			Noted	Noted	Support is noted by the Minister
DP464		Mr Charles Alluto	The National Trust for Jersey	Proposal 7	Conservation Area Designation	Supporting	The Trust once again welcomes this initiative but would like to reiterate it is essential that a firm target date is set for its completion.		Noted	Conservation Areas will be designated during the Plan period. Work is ongoing, in parallel with the review of the island Plan, to develop proposals for St Helier. These proposals will be published and consulted upon separately, with any designation being adopted and issued through supplementary planning guidance.	Support is noted by the Minister
DP515		Mr Paul Harding	The Association of Jersey Architects	Proposal 7	Conservation Area Designation	Supporting	We welcome the Policies to introduce Conservation Areas, providing Proposal 7 is rewritten to make it clear they will be specific area with single identifiable unique character.	We have heard suggestions the whole of St Helier may be designated a Conservation Area, within which there will be areas of 'indeterminate' and 'poor' conservation character. Please can we have these sections re-written to avoid risk of such absolute nonsense arriving at a later date.	Noted	Conservation Areas will be designated during the Plan period. Work is ongoing, in parallel with the review of the island Plan, to develop proposals for St Helier. These proposals will be published and consulted upon separately, with any designation being adopted and issued through supplementary planning guidance.	The Minister notes the qualified support for this proposal
DP526		Mr Paul Harding	The Association of Jersey Architects	Proposal 7	Conservation Area Designation	Supporting	Proposals 1-14 & Policies BE1-BE3 - St Helier and other Regeneration / Local Development Zones We welcome and support the principal thrust of these sections, the proposals and Policies.		Noted	Noted	Support is noted by the Minister
DP676		Mrs Sue Lissenden		Proposal 7	Conservation Area Designation	Supporting	Conservation Areas are a good idea provided they can be adequately and sensitively policed.	At present government will find it hard to afford to employ the persons to do the latter, but that is no reason for scrapping the idea. Elsewhere volunteers are used, but a voluntary workforce	Noted	Any breaches of planning control in Conservation Areas, once introduced, will be dealt with through the existing resources of	Support is noted by the Minister

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								and government make uneasy bedfellows.		the Planning and Environment Department.	
DP820		Mrs Susan Kerley		Proposal 7	Conservation Area Designation	Supporting	I endorse the suggestions and comments made by the National Trust for Jersey on these policies and proposals		Noted	Noted	Support is noted by the Minister
DP84		Mr Stephen de Gruchy		Proposal 7	Conservation Area Designation	Supporting			Noted	Noted	Support is noted by the Minister
DP963		Deputy Philip Rondel	Parish of St John Working Party	Proposal 7	Conservation Area Designation	Neither	St John has a significant number of important historical buildings, churches and Sights of Special Interest (SSI's) as well as other slightly less protected structures Buildings of Local Interest (BLI's). There are a total of 176 such listed buildings within the Parish of St John and these fall into the following categories: 112 BLI's, 56 SSI's and 9 pSSI's. The Working Party supports recent initiatives to alter and reclassify these buildings. Certain areas of both 'Villages ' are of historical interest and they assist in contributing both character, appearance and an unspoilt atmosphere in the Parish. This approach must be maintained and enhanced.		Noted	Conservation Areas will be designated during the Plan period. Work is ongoing, in parallel with the review of the island Plan, to develop proposals for St Helier. These proposals will be published and consulted upon separately, with any designation being adopted and issued through supplementary planning guidance. Work to assess the potential for designation of Conservation Areas in other parishes will be progressed later during the Plan period: proposals for their definition and designation may emerge in some of the northern parishes through the process of Village Plan preparation, under the auspices of Proposal 14, which is welcomed.	The Minister notes the support for this proposal
DP296		Mrs Penelope Lee		Policy HE 3	Preservation or enhancement of Conservation Areas	Supporting			Noted	Noted	Support is noted by the Minister
DP845		Mr Rod Mcloughlin		Policy HE 3	Preservation or enhancement of Conservation Areas	Supporting	The designation of wider areas of interest which seeks to maintain the overall character and style of that area is to be welcomed . There is an opportunity to reinforce the significance of such areas by a combination of interpretation panels, maps and works of art which, in addition to providing information about the conservation area, can also themselves contribute a further aesthetic dimension to that area. Once again, the percentage for art policy could deliver the required funding and, in relation to the application of 'pooled funds ', could provide an especially appropriate use for those funds , particularly if the importance of public art to		Noted	The potential for sympathetic enhancement of Conservation Areas is noted and the proposed policy framework would enable this.	Support is noted by the Minister

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							sense of place is reinforced in the Island Plan. (It might be noted that the historic residential areas of north St Helier are almost entirely devoid of public art of any description.)				
DP85		Mr Stephen de Gruchy		Policy HE 3	Preservation or enhancement of Conservation Areas	Supporting			Noted	Noted	Support is noted by the Minister
DP297		Mrs Penelope Lee		Policy HE 4	Demolition in Conservation Areas	Supporting			Noted	Noted	Support is noted by the Minister
DP86		Mr Stephen de Gruchy		Policy HE 4	Demolition in Conservation Areas	Supporting			Noted	Noted	Support is noted by the Minister
DP298		Mrs Penelope Lee			Archaeology	Supporting			Noted	Noted	Support is noted by the Minister
DP739		Paul Harding	The Association of Jersey Architects	Policy HE 5	Preservation of Archaeological Resources	Objecting	3 Where archaeological remains are of minor importance or consist of moveable artefacts we cannot understand why there should be a presumption in favour of their preservation in-situ because this makes them inaccessible to the general public. We submit it is far better such transportable archaeology is preserved in the Jersey Museum / Societe Jersiaise where they can be easily accessed and their value understood.		Reject	Excavation of archaeological evidence results in the total destruction of evidence (apart from the removable artefacts) from which future techniques could almost certainly extract more information than is currently possible. Excavation is also expensive and time-consuming, and discoveries may have to be evaluated in a hurry against an inadequate research framework. The preservation in-situ of archaeological remains is, therefore, nearly always to be preferred.	The Minister is not minded to amend the draft Plan
DP87		Mr Stephen de Gruchy		Policy HE 5	Preservation of Archaeological Resources	Supporting			Noted	Noted	Support is noted by the Minister