

SUBMISSION BY NICHOLAS POOLE IN RESPECT OF ISLAND PLAN INTERIM REVIEW (IPR) FIELD 622

I present the following submission in opposition to the proposed rezoning of Field 622.

In September 2006 / 2007 the Minister of Planning & Environment (MPE) met with the Committee des Connetables concerning rezoning of sites for sheltered and first time buyer homes. Only 8 Constables wished to progress plans/rezoning proposals – The Parish of St. Ouen (PSO) did not.

3 Parishes expressed a specific need to provide homes for first time buyers – PSO did not.

Field 622 was never put forward despite the fact that PSO had, via the Rectorat, owned the field since the 1880s.

Within a few weeks of the September 2007 meeting, Mrs Coulter died leaving PSO a substantial legacy. **Only** then did the PSO suddenly generate a housing requirement.

PSO's attempts to rezone Field 622 have been rejected on several well documented occasions by MPE¹. The current consultation process therefore is bizarre in the extreme.

Field 622 has long been designated green zone forming the boundary for westward development for PSO². This green zone designation is for good purpose and must not be treated lightly.

Field 622 is an excellent size and shape to accommodate modern farming methods. It is utilised for agriculture year round. At the July 2013 Public Inquiry, a senior planner of the Department of Environment attempted to diminish the relevance of the site to agriculture, a totally unsubstantiated submission³. The Royal Jersey Agricultural & Horticultural Society (RJA& HS) state 'land should be reserved for commercial primary production if it meets one or more of the following tests.... 'it is of significant productive value' and 'it is of a size and shape that is suitable for modern agriculture e.g. it is level, of regular shape and over 5 vergées in size'⁴. **Field 622 fulfils all these criteria.**

The protection of the Island's agricultural land bank is extremely important. The Island Plan 2011 identifies 'the strong desire to protect the Island's countryside'. Policies SP1, SP4 and SP5 are very relevant in this regard. There has been consistent decline in the area of agricultural land. Critical limits are being reached. In 2008, research indicated that since the 1970s, in excess of 10,000 vergées, over 25% of the agricultural land bank had been lost from farming⁵. (Policy E12 / E13)

The same report states, "the industry is not simply about maintaining financial profitability but also about the logistics of managing larger businesses within fixed resources". (Policy E14)

¹ EiP 5th October 2010, Public Inquiry July 2013.

² Ombudsman Panel with reference to Planning & Developments 1973/4

³ A. Coates, Dept of Environment, Statement of Case July 2013 Public Inquiry, Para 9.5

⁴ RJA&HS General Position Paper of Agricultural Land in Jersey Ref: JWG 2013

⁵ James Godfray 'Protecting the Countryside & Providing for the People'.

Current data indicates that the number of agricultural holdings is reducing, however the average size per unit is increasing. Modern agricultural methods require field sizes and shapes capable of accommodating modern equipment and methods. ‘Changes within the industry in recent years have seen an increased demand for land for potato production, dairy farming and other agricultural activities’⁶

Agriculture not only encompasses environmental factors but importantly it is an economic industry. James Godfray (RJH&AS) states ‘there is no spare agricultural land and the agricultural industry cannot be sustained if more land is sold therefore every field is of immense value’⁷

Common sense suggests that brown field and derelict greenhouse sites in development terms not only increase in importance but should always be the primary point of consideration for development.

Should agricultural production be compromised in favour of development, the agricultural industry will face further decline, a factor the island cannot afford especially in light of the decline of its other primary industry, the finance sector. Should Field 622 be lost to development, Mr P. Houguez, the last surviving dairy farmer in St. Ouen would lose his livelihood⁸.

Jersey will never be ‘self sufficient’ in agricultural terms but must strive to maintain a ‘**Self Reliant**’ agricultural industry.

The loss of Field 622, a well proportioned, highly productive agricultural site would be irreversible and would represent a continued erosion of important agricultural resources.

Accordingly, Field 622s current protection under a ‘Green Field’ designation, strongly suggests that it should be removed from any consideration for development of any nature now and in the future.

Policy E12 – Safeguarding the Agricultural Land Bank – Maintenance of the Agricultural Land (Control of Sales and Leases) (Jersey) Law, 1974

Policy E13 - Safeguarding the Agricultural Land - Enforcement of the agricultural Land (Control of Sales and Leases) (Jersey) Law, 1974

Policy E14 – Ensuring Land is Retained for Commercial Agriculture

⁶ States of Jersey Rural Economy Strategy 2011-2015 White Paper.

⁷ Consultation meeting James Godfray 27/11/2013

⁸ P. Houguez Public Inquiry Submission July 2013