

Mr A. Coates,
Senior Planner,
Department of the Environment,
Planning and Building Services,
South Hill,
St. Helier,
Jersey
JE2 4US

Matthew Costard,
Chairman,
Fortifications Sub-Committee,
CIOS (Jersey),
~~Channel~~,
~~Channel Islands Occupation Society~~,
St. Ouen,
Jersey
~~Channel Islands Occupation Society~~

30 JAN 2012

COPY SENT: LAPP/L
30 JAN 2012

PP1/27012012/CIOS

27th January 2012

Dear Mr Coates,

Plémont Bay Holiday Village – Planning Application No. P/2011/1673

I refer to the above planning application, to which I am responding on behalf of the **Channel Islands Occupation Society (Jersey)**.

We have carefully reviewed the application in the context of the German Occupation structures on the site, and are pleased to note that the plans appear to allow for the preservation of two of the most important surviving structures, namely the coastal artillery observation post ("M3") and the adjacent 5cm mortar position to the north-east.

For the record, we reiterate the comments, observations and recommendations made in our letters of 18th September 2006 (in response to planning application No. P/2006/1868) and 20th April 2009 (in response to planning application No. P/2009/0709) (copies enclosed).

It is also pertinent to note that the environmental and "specialist" reports accompanying application No. P/2009/0709 (and interim application No. P/2009/2108) have been transferred *en bloc* to the file concerning the present application, and thus our detailed analysis of their contents, as expressed in our letter of 20th April 2009, is still relevant.

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In summary, it is our opinion that the following German structures on the site are crucial to its historical interpretation and should be retained:

1. The coastal artillery observation post ("M3") to the north-west of the site (currently listed under a pSSI designation).
2. The adjacent 5cm mortar position.
3. The 5cm mortar position and associated bunker to the south-west of the site. *This was mentioned in our letter of 20th April 2009, but we cannot see it specifically identified in the latest set of plans.*

Should any other structures come to light during development, then there should be a presumption that, wherever feasible, they be retained as well.

Our "*proposals and recommendations for consultation*", as set out in our letter of 20th April 2009, remain in place.

We trust that these comments will be given due consideration.

Yours Sincerely,



Matthew Costard,

Chairman,
Fortifications Sub-Committee,
CIOS (Jersey)

c.c. Michael Ginns, MBE, Vice-President, CIOS (Jersey)

c.c. Jeremy Hamon, Hon. Secretary, CIOS (Jersey)

c.c. Paul Burnal, President, CIOS (Jersey)

Miss A. Thomas,
Applications Officer,
Planning and Environment Department,
Planning and Building Services,
South Hill,
St. Helier,
Jersey
JE2 4US

Matthew Costard,
Chairman,
Fortifications Sub-Committee,
CIOS (Jersey),
[REDACTED]
[REDACTED]
St. Ouen,
Jersey
[REDACTED]

20th April 2009

Dear Miss Thomas,

Plemont Bay Holiday Village – Planning Application No. P/2009/0709 (Property No.58)

Thank you for your letter of 1st April 2009, which was addressed to our Honorary Secretary, Mr. Jeremy Hamon, and to which I have been asked to respond on behalf of the ***Channel Islands Occupation Society (Jersey)***.

We have carefully reviewed the plans for this development, in the context of the German Occupation structures on the site, and would like to raise a number of points.

General objectives

We reiterate the comments made in our letter of 18th September 2006, in response to earlier planning application No. P/2006/1868 (copy attached). In our opinion, the most important structure on the site is the German coastal artillery observation post ("M3"), and it must be preserved – something that should be assured by its pSSI designation.

However, there are a number of other structures which are not currently pSSIs but which we feel ought to be preserved as they are vital to the interpretation of the headland's wartime defensive purpose. These are outlined below.

Accuracy and clarity

The application documents, in the form of reports prepared by various organisations who are not experts in the Occupation field, contain a number of errors, omissions and inconsistencies as to the nature and purpose of the visible German Occupation structures within the site, and for clarity we would like the following to be noted:

1. The "historical WWII structure" at the north-eastern perimeter of the site, referred to as such in the main plans prepared by BDK Architects, is pSSI structure No. 05 (Planning ref. OU0191). It is a coastal artillery observation post (German

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denomination "M3"), and is, of course, the same structure identified in our 2006 letter mentioned above. It is *not* an ammunition bunker, as erroneously described in the Michael Hughes Environmental Impact Assessment, the BDK Design Statement and in the plan accompanying the CEMP document.

2. The Archaeological Report prepared by the Museum of London Archaeology Service (MoLAS) contains some surprising omissions. That they were unable to "place the feature ["M3"] with any accuracy" (see page 12) is astonishing as it is quite prominent and is the main German structure on the site. We also have to question why they did not consult the CIOS (Jersey) as a body, but instead chose to rely heavily on a rather basic survey deposited by Mr David Maindonald at the Jersey Archive (the "David Maindonald Research Collection").

Identification and preservation of known German structures within the site

1. Near "M3", in the north-eastern corner of the site is a 5cm mortar position with a bunker beneath it that, post-war, has been used as an incinerator (see the MoLAS report mentioned above). It is not currently a pSSI, but should be retained and preserved.
2. To the south-west of the site, near the tennis courts and pumping station, is a partially buried structure identified in the Preliminary Risk Assessment Report by Strata Surveys Limited (see page 4) and shown in the 1947 aerial photograph of the site (same report, page 19). This is another 5cm mortar position with associated bunker. It is not currently a pSSI, but should be retained and preserved.
3. We are pleased to observe that although the BDK plans only state that "M3" will be retained, the CEMP document states that all three structures are to be retained, and they are specifically marked on the accompanying site map within red demolition exclusion "balloons".
4. Although the report is slightly ambivalent as to their exact nature and location, we are also pleased to note that there is a presumption for the retention of all known German structures within the site in the Michael Hughes Associates Environmental Impact Assessment:

p. 14 (3.61) "There are extant SSI listed WWII German occupation structures within the site including the base of a mortar position and an ammunition bunker [sic.]. There is potential for the site to contain below ground remains of other German defences."

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pp.18-19 (4.22) "There are German WWII Structures designated as SSI's within the proposal site that will not be adversely impacted by the proposal. It is proposed that these are retained and renovated within the scheme..."

p.65 Annexe 2 (G13) "The extant German WWII structures are unaffected by the proposal and these will be enhanced by removing later accretions and repair."

Our proposals and recommendations for consultation

Based on the above observations, we would like to propose the following:

1. pp. 24-25 (3.12) of the CEMP document states that "a detailed scheme for the conservation of the WWII German bunker SSI ref. 05 will be prepared and agreement obtained from Historic Building Section of Planning and Environment Department in conjunction with the Channel Islands Occupation Society".

We are happy to be involved in this manner, but would actually like to be added to the list of Non-Governmental Organisation "Consultees" in order to ensure full participation.

2. We would like to be given the opportunity to undertake an inspection of the site before demolition takes place. This would be with the aim of accurately identifying, surveying and recording any remaining German structures, but also undertaking a study as to their possible retention, protection and (if feasible) restoration.
3. We would wish to see a mechanism in place that ensures that we will be fully consulted should any other German structures be unearthed during the demolition works.
4. The BDK plans in particular state that the structure "M3" will be restored, but they do not include any detail as to how that would be achieved. We would expect to be consulted before any restoration works commenced, and thereafter consulted at intervals during the works.
5. If, as we hope, it is also planned to restore the two mortar positions, then again, we would expect to be fully consulted as to the method.
6. The plans do not state whether "M3" would remain accessible to the general public after completion of the development, or indeed what its purpose would be (there are references to "maintenance", but that was its previous function, and its future role is not clear). In our opinion, the structure would make a superb bird hide – thus reinstating an observation function close to its original wartime role.

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We trust that these comments will be taken into consideration, and do, of course, remain at your disposal should you have any queries.

Yours Sincerely,

Matthew Costard,

Chairman,
Fortifications Sub-Committee,
CIOS (Jersey)

c.c. Senator Frederick Cohen, Planning Minister

c.c. Michael Ginns, MBE, Vice-President, CIOS (Jersey)

c.c. Jeremy Hamon, Hon. Secretary, CIOS (Jersey)

c.c. Paul Burnal, President, CIOS (Jersey)

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Planning & Environment Dept.,
States Offices,
South Hill,
St. Helier,
Jersey
JE2 4US

Matthew P. Costard,
[REDACTED],
[REDACTED]
St. Ouen,
Jersey
[REDACTED]

18 September 2006

Dear Sir/Madam,

Application No. P/2006/1868
Plémont Bay Holiday Village, La Route de Plémont, St. Ouen

I am writing on behalf of both the Main and Sub-Committees of the Channel Islands Occupation Society (Jersey).

The Society is concerned to note that the plans for the proposed re-development of the Plémont Bay Holiday Village make no provision for the retention of the German Army coastal artillery observation post situated on the North-Eastern perimeter of the site, adjacent to the cliff path.

The position, known as "M3", is one of nine similar structures (each prefixed with the initial "M"), built by the German occupying forces around the Island's coastline. Three further Army artillery observation posts were located in converted windmills and in the turrets of Mont Orgueil Castle. All of the original concrete observation posts survive, and it would be regrettable indeed if M3 were destroyed, and the chain effectively broken, through failure to realise its historical significance. For your guidance, an extract from our publication "Jersey's German Bunkers" is enclosed.

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In our opinion, M3 could be retained without seriously affecting the proposed development. According to the architect's plans no buildings would occupy the area on which the bunker lies, which would merely be landscaped as part of the outlying screening works.

At present, M3 is in a deplorable state, with its slits blocked up, an unsightly water tank on the roof, and pipes running along the walls. However, it would be a relatively simple task to remove these post-war excrescences and to reinstate the slits. One possible use for the restored structure could be as a bird hide – a suggestion that has the support of leading local ornithologist, Mike Stentiford.

Our wish, therefore, is to see M3 preserved, and we trust that this will be made a condition of any planning consent granted to the developers.

We look forward to hearing from you further in due course.

Yours Sincerely,

Matthew P. Costard,

Chairman, Fortifications Sub-Committee

c.c. Senator Frederick Cohen

c.c. Paul Burnal, President, CIOS (Jersey)

c.c. Jeremy Hamon, Hon. Secretary, CIOS (Jersey)

c.c. Michael Ginns, Vice-President, CIOS (Jersey)

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8 - ARTILLERY OBSERVATION POSTS

Of all the German fortifications in Jersey, the most prominent and impressive are the three large naval artillery direction and range-finding towers (*Marine Peilstände und Meßstellen*). Nine were planned but only three were completed, at Noirmont Point (*MP 1*), La Corbière (*MP 2*), and at Les Landes, St. Ouen, (*MP 3*), of which mention has been made earlier. All three survive, whilst the basement of a fourth (*MP 9*) under construction is buried in the garden of the property known as "Lesadrieux" in La Rue de la Hougette, St. Clement.

For the benefit of the curious, the others were to have been located at Plémont, St. Ouen, (*MP 4*); Sorel Point, St. John (*MP 5*); Belle Hougue Point, Trinity (*MP 6*); La Coupe, St. Martin (*MP 7*); and at Victoria Tower, Faldouet (*MP 8*).

The multi-storied layout of these towers is explained by the fact that each floor was intended to control a separate artillery battery, using the long base method of range-finding which depended upon a cross bearing being taken upon a target from two adjacent towers; the known distance between the two forming a base line upon which calculations could be made. The system only really worked when concentrating on a single target, and had an invasion fleet of several hundred ships appeared off any of the Channel Islands, as happened elsewhere, the observer in one tower could never really have been sure that the ship upon which he was obtaining a bearing was the same one that his opposite number in the neighbouring tower would be targetting. Hence the whole system was pointless and, in the event, the towers were used for simple observation purposes or for mounting radar or anti-aircraft guns.

Army Coastal Artillery Observation Posts

Although only built to reinforced field standards, and therefore not included in the Building Progress Reports, it would be opportune to mention here the split-level observation posts of the Army coastal artillery as they are both numerous and prominent. These may be seen at La Corbière (*M 1*); Les Landes, St. Ouen (*M 2a* and *2*); Plémont, St. Ouen, and converted into a store for the adjacent (now derelict) holiday camp (*M 3*); Sorel Point, St. John (*M 4*); Egypt, Trinity, and now in use as a nuclear monitoring station (*M 5*); South Hill Gardens, St. Helier (*M 9*); Le Chemin des Signaux, La Moye, St. Brelade (*M 10* and *M 10a*, with the former now in use as the headquarters of the Jersey Amateur Radio Society).

To complete the list, it should be mentioned that *M 6* and *M 8* were housed in adapted windmills at Rozel and Grouville, respectively, while *M 7* consisted of specially erected turrets on the summit of the mediaeval Mont Orgueil Castle.

Battery Observation Posts

Whilst all the coastal batteries had observers stationed in the buildings mentioned above, some had, in addition, their own battery observation posts which were usually reinforced field type constructions with two or three rooms, one of which would be the observation room.

Batterie Hindenburg : This battery had a purpose-built observation post which now lies beneath the property known as No.10 La Petite Ruelle, La Route Orange, St. Brelade, and is incorporated into the house.

Batterie Ludendorff : Made use of St. Ouen's Mill in which the ranging chart still survives above the observation slits.

Batterie Endrass : A now sealed battery observation post stands at the top of Westmount Gardens, St. Helier, with sweeping views over St. Aubin's Bay, necessary for this harbour blocking battery.

Batterie Schlieffen, Verclut, Grouville : When this battery moved to Jersey from Guernsey in August, 1944, it took over the command post of an infantry resistance nest for use as an observation post. This survives, but is difficult of access and well overgrown.

Batterie Haeseler, La Coupe, St. Martin : Also moving to Jersey from Guernsey at the same time as *Schlieffen*, this battery had a field type observation post of which all traces have long since vanished.

All the divisional artillery batteries had their own purpose-built observation posts, with the exception of *Batterie Dietl* at Maufant which shared Rozel Mill with the coastal artillery, and *Batterie Seeckt* at La Rue au Blancq, St. Clement, which used the 19th century folly known as Nicolle Tower. All survive, but it may be noted that the observation post of *Batterie Brauchitsch* which stands in the grounds of "Floreal", high above Gorey Village, has been sealed and converted into a water catchment tank for the garden.