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The Minister for Planning and Environment  
 States Offices  
 South Hill  
 St. Helier  
 Jersey  
 JE2 4US

02 FEB 2012

PP1/30 012012 Protection of  
 Jersey Heritage

30 January 2012

Dear Minister Duhamel

**Planning Application P/2011/1673 – Plémont Holiday Village, La Route de Noirmont**

Demolish all existing buildings and remove hard-standings. Return 67% of total site area (16.19 verges) to public accessible natural landscape. Replace existing Manager's bungalow/Staff cottage with 2 No. four bed houses and construct 26 No. houses comprising of 10 No. three bed houses, 11 No. four bed houses and 5 No. five bed houses all in three groups plus landscaping and reed-bed rainwater recycling pond. Create passing place on C105 at Western edge of Field 48.

**The Requirement for a Public Inquiry**

The Council is convinced that if you are minded to approve this application you should order a Public Inquiry in accordance with Article 12 of Planning and Building (Jersey) Law 2002. It is self-evident that to grant permission:

- “(a) the development would be likely to have a significant effect on the interests of the whole or a substantial part of the population of the Island; and
- (b) the development would be a departure (other than an insubstantial one) from the Island Plan”.

**A Significant effect on the Interests of the Population of the Island**

The permanent destruction and loss of the Island's cultural heritage comprising the scenically beautiful and historic landscape at Plémont is in the interests of neither the present population nor future generations of Island residents. The successful public demonstration involving 7000 people standing in 'The Line in the Sand' and organised by the National Trust for Jersey is more than sufficient evidence of this fact.

**A Major Departure from the Jersey Island Plan 2011**

To permit the building of 28 houses for individual, private ownership, the majority of which would be built on previously undeveloped land in historic fields 44 and 47 and removed from the site of the derelict holiday

camp buildings, would be in direct contravention of Island Plan policies NE 7 (Green Zone) and SP 4 (Protecting the natural and historic environment). To create a large-scale, modern housing estate in this sensitive area would not only fail to achieve the main intentions of the Island Plan to protect important coastal landscape but also be in contradiction of the very purposes of the Building and Planning (Jersey) Law 2002 which is to conserve, protect and improve the Island's natural beauty, natural resources and general amenities, its character, and its physical and natural environments.

### **Reasons for Objection**

Apart from the relinquishment of the claim to ownership of the States owned strip of land to the North of the site this application is substantially unchanged from the previous application. Council letters objecting to Applications P/2009/0709 and P/2011/0144 dated 27 April 2009 and 24 February 2011 respectively refer. Reasons for objecting to large-scale developments given in those letters still remain valid and are again drawn to your attention.

The Council firmly believes that it would be an environmental catastrophe to permit 28 modern houses with new access roads, unnatural landscaping, tree-planting and manicured gardens which would destroy for ever, what is possibly the most important part of our remaining coastal landscape which is an irreplaceable and essential part of our cultural heritage. This headland is an integral part of an area particularly noted for its largely unspoilt scenic beauty with sheer rugged cliffs, long sea views and, apart from the unsightly derelict holiday camp, a total absence of large scale development. This outstanding combination makes this part of the north coast countryside most prized for its wilderness and remoteness. This whole area deserves of the highest possible level of protection from any further development.

Claims made in the application that permission for this development should be granted on the grounds that it would produce 'planning gain' and 'an improvement in the natural environment' are incredible and are all refuted below.

An independent Environmental Impact Assessment would have taken full note of the recommendations of the Countryside Appraisal Report completed in 1999 and which was regarded as a key document in the production of Jersey Island Plan 2011.

The whole basis of this application is seriously flawed as follows:

- a. It is implicit in the application that the whole area within the site boundary is considered to be 'brown-field'. 'Brown-field' by definition (see UK PPG 3) is previously developed land where buildings are standing. At least 20 of the proposed new houses are planned to be built on previously undeveloped land in the Green Zone. This would be in direct contravention of Policy NE7 which describes a "general presumption against all forms of new development for whatever purpose".
- b. The claim that 67% of the site area will be made available to public accessible natural landscape is disingenuous in the extreme. The Council respectfully suggests the Minister should obtain answers to the following questions:
  - (i) What are the boundaries of the 'public accessible' area?
  - (ii) Who will own this 'public accessible' area?
  - (iii) How will it be made into 'natural landscape' and who will decide what constitutes 'natural landscape' on the Plemont Headland?
  - (iv) Who will own the new access roads and footpaths and who will be responsible for their upkeep?

- c. The Environmental Impact Assessment refers to the Countryside Appraisal Report acknowledged in the Jersey Island Plan 2011 to be the key planning document but completely disregards the report's conclusions. You will know that the Council has repeatedly argued that it is illogical to exclude the Plémont headland from the Coastal National Park. It should receive the highest possible level of protection from any new development as called for in the Countryside Appraisal Report. This prominent headland on the North Coast with the present holiday camp buildings all situated within the ring contour drawn at 240 feet, and with the northernmost edge of the buildings less than 200 metres from the shoreline. (This level of illogicality in drawing the boundary of the Coastal National Park is demonstrated by the fact that part of the Coastal National Park in the Parish of St Martin lies not on the coast but in the heart of the rural countryside, more than 2 kilometres from the shoreline).
- d. Accepting the anomaly that the Countryside Appraisal report places the Plémont headland, not in Character Type A: Coastal Cliffs and Headlands, but in Character Type E: Interior Agricultural Land, E1: North-West Headland (ST. OUEN), levels of protection recommended in the report for E1 are as follows:

**Capacity:** There is very limited capacity to accept any new development and it is recommended that this area should have high levels of protection.

**Guidance:** The North-west Headland of St. Ouen is characterised by sparse development and remote character. It should remain undeveloped.

Furthermore, in dealing with Jersey's Coastal Cliffs and Headlands area (A1) the report states:

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- In some places inappropriate tree planting along the heath land edge and overzealous maintenance of footpaths plus numerous benches has created a 'park-like' landscape which detracts from the essential open, exposed, windswept character of the area.
- The visual and aural impacts of developments on, or adjacent to, the heathland edge such as the holiday complex at Plmont, shooting range at Crabbe, model aircraft site at Les Landes and proposed go-kart track all threaten the peaceful, remote, wilderness qualities of the north coast.

The report further states on Levels of Protection and Capacity to Accept Change:

it is recommended that the north coast heathlands should have the highest level of protection.

**Capacity:** There is no capacity to accept further development. In this area, even small scale isolated developments can have a major impact on the sense of wilderness, isolation and remoteness which are important, although diminishing qualities in Jersey.

**Guidance:** Any change such as the creation of new footpath links should be subject to a full environmental assessment, *as should any developments adjacent to the character area which could have a visual, aural or other impact on the north coast heathlands.*”

Also when dealing with Character Area E1: North-West Headland (St Ouen) in describing Patterns of Enclosure (page 159) the report states:

“The enclosed land at St. Ouen contains a diverse mixture of field patterns. The almost square rectangular fields adjacent to the heathland edge at Les Landes conform to a pattern normally thought to be “Celtic” (Iron Age) or even Neolithic. The Council wishes to draw to your attention that previously undeveloped land within the boundaries of Fields 44 and 47, part of the site intended for development and where it is planned

to build 12 houses (numbered on the plans 1 to 12), matches this field description exactly. The Countryside appraisal report recommends that such areas should remain undeveloped and this provides further endorsement, if it is needed, to Policy SP 4 (Protecting the natural and historic environment).

## **Non Planning Matters**

### **Relevant Propositions of The States of Jersey**

You will know, having been present at the debate and voted against the successful proposition P.112/2006 – Plémont Headland, St.Ouen: Preservation for Public Enjoyment, that it was agreed by the States that it would be in the public interest for the headland at Plémont to be preserved as open space for the enjoyment of the public of the Island. The Council of Ministers was directed to consider all options and recommend the preferred option without delay. To date the public are unaware that any meaningful negotiations have taken place with the owners to establish a reasonable valuation for the site in its present state and without planning permission.

P 144/2009 – Plémont Holiday Village: Acquisition by the Public was opposed by the Chief Minister on the grounds that compulsory purchase was a procedure of last resort. The States at that time had not decided to acquire by negotiation and at what price. This still seems to be the present situation.

### **Proposal by The National Trust for Jersey**

The Council supports most strongly the recent proposal by the National Trust for Jersey that the Plémont Holiday Village site should be purchased and returned to nature as a commemoration of the Queen's Diamond Jubilee. As the most significant environmental restoration project ever undertaken in Jersey it would be a fitting and appropriate way to mark this historic event and demonstrate the continuing strength of the Island's allegiance to the British Crown.

Yours sincerely

A black rectangular redaction box covering the signature of J.M. Mesch.

J.M.Mesch

For Chairman of the Council

Chairman - Maurice Dubras; Vice Chairman - Chick Anthony; Treasurer - Neil Molyneux;  
Sue Kerley; Group Leaders: Heritage Protection Policy and Island Plan Review - John Mesch;  
Geology, Archaeology and Landscape - John Renouf; Fortifications - Paul Bernal;  
Urban Conservation and Rescue - Andre Ferarri; Vernacular Architecture - Neil Molyneux;