



Anneville Lodge, Le Mont des Landes, St Martin, JERSEY, JE3 6DJ

## PLÉMONT PUBLIC INQUIRY SUBMISSION

### **Background**

The Council for the Protection of Jersey's Heritage has consistently maintained that to permit the building of a large-scale housing estate on the historic coastal headland at Plémont would be in direct contravention of the fundamental purposes of the Building and Planning (Jersey) Law 2002 and identified policies effective under the Law described in Jersey Island Plan 2011, specifically designed to protect important coastal and countryside areas<sup>1</sup>.

It is the considered opinion of the Council that to allow development as planned would constitute an environmental disaster of major proportions.

Conclusions reached in the Environmental Impact Assessment (EIA) and the Site Specific Landscape and Visual Assessment (SSLVA) submitted in support of the application are disputed. The EIA fails to take proper account of the definitive assessments made in the Countryside Appraisal Report 1999<sup>2</sup>, a key document in the production of the Jersey Island Plan. The SSLVA does not consider the most important landscape viewing area near Hougue de Grosnez, from which the whole site is plainly visible from the land.

Directions by previous planning committees have been ignored in this latest application. For example, in 2002 the Planning and Environment Committee advised<sup>3</sup> that it would not support:

- i. Any major residential development in this location;
- ii. A residential development of the same floor-space;
- iii. Any form of housing 'estate' style development in this location.

This is an 'estate'<sup>4</sup> style development with an effective area spread over the site larger than the existing holiday-camp buildings. The limited comparison of the buildings floor-space, which ignores garaging, parking areas and gardens, has nothing to do with judging the actual visual impact of the proposed development.

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<sup>1</sup> CPJH letters on P/2011/1673 dated 30 January 2012, P/2009/2108 dated 6 December 2009, P/2006/1868 dated 2 November 2006.

<sup>2</sup> Countryside Character Appraisal commissioned by States of Jersey Planning and Environment Committee and published in 1999.

<sup>3</sup> Meeting of the Planning and Environment Committee 20 June 2002.

<sup>4</sup> The Concise Oxford dictionary defines 'estate' as "a modern residential or industrial area with integrated design or purpose."

Reasons given by the Minister for refusing an application P/2006/1868 for 36 dwellings<sup>5</sup> are relevant to this application and remain valid.

### **The Importance of the Plémont Headland**

The importance of the Plémont coastal headland as part of a prominent, scenically beautiful and historic landscape of the North coast cannot be over emphasised. It is in clear view along the coast from Grosnez in the West to Sorel Point in the East. It is noted for its geological formation, its largely treeless, scenically beautiful, natural windswept wildness and wilderness character. The Plémont headland is an integral part of the coast stretching from L'Etacq in the South.

There is no comparable stretch of coastal cliff in the Channel Islands, in Brittany, in Normandy or in Southwest England that can claim such a range of geological, archaeological, historical, natural historical and other features as this area of cliff and heathland in Jersey<sup>6</sup>. As such, it is priceless, scenic, cultural heritage which should be preserved for the enjoyment of future generations.

### **The Existing Blot on the Landscape**

The derelict holiday-camp buildings create a dreadful blot on this largely unspoilt and remarkable landscape. Their existence is the only possible justification for the present application

The closely built holiday-camp complex was built at a time when the tourism industry was seen as having paramount importance to the economy of the Island. Furthermore, the decision to permit its building in this place was made at a time when preserving historic, coastal landscapes, scenic beauty and cultural heritage was not appreciated as it is today.

The developers will have to provide strong justification for repeating a serious planning mistake made in less enlightened times and when economic circumstances were very different.

It will need to be demonstrated that this development is necessary to meet an essential community need, and that it cannot be located elsewhere.

The present, derelict buildings represent a failed commercial enterprise in the declining tourism industry which was no longer viable and ceased trading in September 2000. These buildings have been in decay ever since.

A representative has stated in public<sup>7</sup>, on behalf of the owners, that they have the means to restore the derelict buildings for their original use. There is a measure of general agreement that this constitutes an existing legal entitlement. The same representative also

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<sup>5</sup> Planning and Building Services letter Application P/2006/1868 dated 17 July 2008.

<sup>6</sup> Unpublished paper 'Evaluation of the North Coast of Jersey with Particular Reference to the L'Etacq to Plémont Stretch' Dr. J.T.Renouf 2002.

<sup>7</sup> Public meeting held in St Ouen's Parish Hall.

stated in public that the present buildings are dangerous and rat infested. Therefore, the Inquiry should consider instructing the Planning Committee to issue an order in accordance with Article 84 of Planning and Building (Jersey) Law 2002 requiring the repair or removal of these ruinous or dilapidated buildings within a reasonable time-frame. In conjunction with this order the Inquiry should consider the applicability of Articles contained in Chapter 3 of the Planning Law which deals with dangerous buildings.

### **The Unique and Precious Character of this part of the North coast**

The Inquiry should also take full note of the Countryside Character Appraisal document and in particular its description of Character Area A1: North Coast Heathland, and Character Area E1: North- West Headland (St. Ouen) where it is stated:

*The visual and aural impacts of developments on, or adjacent to, the heathland edge such as the holiday complex at Plémont, shooting range at Crabbé, model aircraft site at Les Landes and proposed go-kart race track all threaten the peaceful, remote, wilderness qualities of the north coast.*

It is recommended that the north coast heathlands should have the highest level of protection and:

*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.*

Addressing threats to local character it is stated:

*New residential 'suburban' groups of houses go against the grain of the remote 'rural' character of the area.*

And on required levels of protection and capacity to accept change:

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

### **The need to preserve the panoramic views and scenic beauty of the coastal landscape at Plémont**

To replace the present derelict holiday-camp with a large-scale housing development, with the majority of the planned buildings, not on the site of the present buildings, but displaced onto undeveloped land, would, in addition to being in direct contravention of Island Plan policy NE7, destroy for ever this scenic, coastal landscape and urbanise the

area, thereby detracting from the heathland character and historic field patterns on the site itself, and on the adjacent areas clearly shown on the Duke of Richmond map printed in 1795.

### **Planning Application P/2011/1673 and its Non-Compliance with the Provisions of Jersey's Planning Law**

It is certain that a large-scale housing estate with an extended access road with 28 new houses arranged in three groups with walled gardens interconnected by new footpaths all set in un-natural, managed grassland areas with extensive, alien tree-planting will result in the permanent destruction and suburbanising of one of the few remaining and rapidly disappearing natural coastal landscapes in Jersey. Clearly this would be in direct contravention of the very purpose of Planning and Building (Jersey) Law 2002, as laid out in Article 2, 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.*

*to protect sites and places that have special importance or value to the Island*

*to ensure that the coast is kept in its natural state.*

To replace one large blot on this magnificent landscape with another cannot be seen as justifiable under present Law.

### **Jersey Island Plan 2011**

Many Island policies are relevant to this application. The most important concerns the protection, under Policy NE7, of the designated Green Zone within which the whole site is situated. Also directly applicable here is Policy ERE 1, 'safeguarding agricultural land'. The Council agrees with the observation made by in the Main Inspectors' Report on (Draft) Island Plan 2009 about the importance of

*safeguarding agricultural land to increase the security of food supplies*<sup>8</sup>

The Council disagrees with the applicant's claim that the whole site, though including parts of Fields 44 and 47 and farmland<sup>9</sup>, is all 'brownfield'.

The Jersey Island Plan Glossary definition<sup>10</sup> lacks the detail provided in Planning Policy Statement (PPS) 3, effective in the UK<sup>11</sup>. All the houses in the South East 'cluster' numbered 1 to 12 inclusive, part of house number 14, houses 19, 20, 21 and 22 are

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<sup>8</sup> Inspectors' Main Report on The (Draft) Island Plan 2009, Para. 2.8.

<sup>9</sup> Claim reported in The Jersey Evening Post, 3 July 2012 (page 3).

<sup>10</sup> Jersey Island Plan 2011, Glossary at Appendix B.

<sup>11</sup> UK Planning Policy Statement 3(PPS 3).

planned to be built on previously undeveloped land in the Green Zone, in direct contravention of Policy NE7.

## **CONCLUSION**

Application P/2011/1673 to build a housing estate of 28 houses in this sensitive Green Zone area is in contravention of the very purposes of the present planning Law and identified policies of the Jersey Island Plan 2011. The applicant's contention that there will be positive environmental improvement betrays a fundamental misunderstanding of the importance of the Plémont coastal headland as outstanding cultural heritage that should be protected at all costs from any new development. Any large-scale development here would constitute a major environmental disaster for Jersey.

In these circumstances the Council is convinced that the Inquiry cannot support the present application in Law and it should therefore recommend to the Minister for Planning and Environment that it is refused forthwith.

**1499 words**

