Mr Chairman, Members

There are three principal reasons for refusing this application.

First, half the hotel faces the wrong way. It faces due north. The 70 bedrooms on that side will overlook a small road and across to the front of the Odeon Cinema. And I suspect that no sunshine will enter those rooms at any point in the year.

Secondly, many of the apartments in the scheme have been designed as 'single aspect flats.' They have windows on only one side and they're entered from a long corridor. Guidelines for planning authorities in the UK stipulate that between a third and half of apartments in an urban area like this should be dual-aspect.

Thirdly, when holidaymakers walk out of the Premier Inn and turn right to walk into town, they'll be confronted with a wall of five storeys that says nothing about the charming Island they've elected to visit but could be in 'Anywhere Town.'

The solution is to turn the hotel through 90 degrees so that *all* its bedrooms get sun, either in the morning or the afternoon. The outlook from those rooms – especially on the east side – will be wider and more interesting. And, by setting it back on the site, the hotel will be less overbearing.

All of which would comply with the Island Plan policies on tourism, allow the historic buildings to be kept and the street to be re-worked so that holidaymakers walk along a road that speaks of its proud Regency past. The applicant will say: 'it's this or nothing.' They will tell you that they or Premier Inn – or both - will walk away if the scheme is rejected. I don't believe that; the developer will adapt the scheme (as happened on the Gas Works site).

The applicant will tell you that the hotel group says it *must* have the corner site and doesn't 'do' historic buildings. In fact, there are Premier Inns operating out of listed buildings in London, Bristol, Newcastle, and Exeter.

In 2017, 96 per cent of Islanders said it's 'important to conserve Jersey's historic buildings for future generations.' 83 per cent of St Helier residents thought 'historic places are assets for the re-vitalisation [of town] and for economic development.' And the States' own document 'Future Jersey' includes these words: 'Care is needed to ensure the ongoing renaissance of Town takes advantage of its rich heritage and works *with* the historic character, rather than viewing 'heritage' as a restriction to overcome.'

That, of course, is a principal theme of the Masterplan for this part of St Helier and the *Development Brief* for this site. The Department's report reproduces quite a lot of the Brief and repeatedly uses the words 'broadly complies.' But if you look at the *detail*, the scheme *doesn't* comply.

So, the scheme doesn't comply with your own development brief; it's strongly opposed by your own historic buildings team; it's been rejected by your own Architecture Commission; and it runs contrary to the aspirations of Future Jersey.

In planning terms, this is an 'old fashioned' scheme. All over the world sophisticated developers and enlightened planning authorities have moved on; they *now* say that the 'modern' way to re-develop towns and cities is to retain their heritage and 'knit in' new, respectful buildings. It's the best of both worlds - but it requires a level of understanding and urban design that is absent in these proposals.

Two weeks ago, the British Government announced a £95 million regeneration fund for 69 towns and cities. Closed shops will be re-opened, historic buildings saved and restored, and new buildings added.

You've been told the buildings in Bath Street are beyond repair. Exactly the same was said about every building we've saved in Jersey.

Thirty years ago, we convinced States' Members that Government House was a building of merit - when the bulldozers were on the lawn.

When we took on the Hue Street cottages we were told they were too dangerous for workmen to enter. Look at them now!

16 New Street was boarded up for years. Today, beautifully restored by the National Trust, no one can believe it came close to demolition.

We were told by a developer that the only way to save and convert the Jersey College for Girls was to completely gut it. We drew up an alternative scheme, and got planning permission.

In Dumaresq Street, we were told the shops had to come down. Saved by our efforts - and heroically restored by the National Trust - the development includes a Premier Inn. And *that* successful scheme was completed by the architects who've drawn up the plans before you today.

They must know that if it can be done there it can be done here.

Ends