



A  
CONSERVATION STATEMENT  
for  
**KEMPT TOWER**  
**JERSEY**



2011

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## INTRODUCTION

The subject of the Conservation Statement is Kempt Tower, built in 1834 in St Ouen's Bay, Jersey. The primary purpose of the statement is to draw together existing information, to set down a brief history for the site, a description of the principal elements, an assessment of significance, the identification of major conservation issues and a series of policies. The Conservation Statement is intended to inform and advise the management of the site and future decisions concerning its alteration and use.

The preparation of the Conservation Statement has been undertaken by Roger Hills BA MA DipBldgCons (RICS) IHBC, Jersey Heritage Head of Historic Buildings. Discussions were held with a number of people during the preparation of the document and Jersey Heritage would particularly like to thank the members of the Conservation Advisory Group for their contributions and help:

John Clarke	<i>Société Jersiaise</i>
Richard Le Sueur	<i>The National Trust for Jersey</i>
Michael Ginns	<i>Channel Islands Occupation Society</i>

Drafts of the document were circulated and commented on at various stages during their production and the document was approved by the Board of Trustees of Jersey Heritage at a meeting held on 19<sup>th</sup> September 2011.

## PART ONE: SIGNIFICANCE

### UNDERSTANDING THE SITE

This part of the Conservation Statement briefly reviews the history and development of the site, provides an overview of the key surviving elements of its existing fabric, and an assessment of its significance.

#### **Topography**

Kempt Tower is located at the west end of Jersey in the Parish of St Ouen. It is situated in the St Ouen's Bay coastal plain, a flat low lying land surface only slightly raised above sea level with deposits of blown sand and thin sandy soils overlying Jersey Shales. The bay also includes peat deposits associated with a Neolithic 'submerged forest'.





Kempt Tower showing New North Battery and German defences

### **Historical overview**

Peat beds and the remains of a submerged Neolithic forest are sealed beneath the inter-tidal sands in the bay adjacent to the site. The peat deposits provide a palaeo-environmental record of past landscape changes, resulting from rising sea levels and the activities of prehistoric inhabitants following the last glacial period. There is no evidence in archaeological remains, documents or the surviving structures for any further occupation or human activity on the site until defensive military positions were constructed along the coast in the late 18<sup>th</sup> century.

St Ouen's Bay is one of the most exposed stretches of coast in Jersey and was historically vulnerable to invasion. However, for many centuries, an offshore reef at the north end of the bay offered natural protection from invasion for that area. The 18<sup>th</sup> century witnessed a period of increased political tension between Britain and France and the two nations clashed as their ambitions grew. Because of its geographical location, Jersey was more or less on a continuous war footing. A Survey of St Ouen's Bay produced by J Chamberlaine in 1758 indicates proposals for static works for the defence of the bay, which would have been manned by the Militia Artillery of the parishes of St Peter, St Mary and St Ouen. The proposals arose principally out of the threat to Jersey arising from the Seven Years War, but were never put into effect (Public Record Office ref: MR 1030).

There was an attempted invasion of the Island in 1779. A party of Frenchmen led by the Prince of Nassau arrived in St Ouen's Bay but was prevented from landing by the militia artillery under the charge of the Rector of St Ouen, le Sire du Parcq, who brought the guns to a favourable position under fire from the hostile fleet. The attack highlighted the need for more fortifications in the area and the map of Jersey engraved by William Faden, Geographer to the King, in 1781 shows the gun batteries, redoubts and entrenchments raised along the coast, including on the site of Kempt Tower (Jersey Archive ref: L/F/120/A/72).



Faden Map, 1781

Batteries were positions for groups of cannon (often three or four) located on the coast so as to menace enemy shipping attempting to approach the shoreline. They were often temporary works with earth embankments and timber decks to support the gun carriages. Some more substantial examples with stone pavements survive - such as the New North Battery that fronts Kempt Tower.



New North Battery, 2011

A list of stone and wood gun platforms in need of repair is noted in the Defence Committee Minutes, 26<sup>th</sup> October 1787. The following are recorded in St Ouen's Bay: Half Moon Battery, 3 guns; Middle Battery, 2 guns; North battery, 3 guns; New North battery, 3 guns; and Du Parcq's Battery, 3 guns.

All were 24-pounder guns with only the Middle and North Batteries being provided with stone platforms (Jersey Archive ref: C/B/B1/1)

A report on the batteries around the Island, 28<sup>th</sup> August 1797, records that New North Battery had a sod parapet “in tolerable repair” with 3 x 24-pounder guns on traversing platforms under the charge of the Island Militia (Société Jersiaise Library ref: M20/10).

In a letter from General Don to Earl Spencer on 22<sup>nd</sup> May 1806, Don highlights the threat of a French attack on Jersey and recommends the best means of defending the large bays is by combined operations of Field Artillery, Cavalry and Infantry supported by a line of armed round towers on the beach, “such as lately built on the coast of Suffolk and Kent”. In an accompanying report Don observes that the capture of the Channel Islands by the French would provide them with the means of interrupting British trade in the Channel (Jersey Archive ref: L/F/95/A/2)

A report on the different magazines in the Island in 1810 notes a magazine at ‘New North Battery’ in St Ouen’s Bay (Société Jersiaise Library ref: M20/8).

In the immediate aftermath of the final defeat of Napoleonic France in 1815, Jersey’s coastal defences were maintained in some state of readiness. A map of Jersey engraved by Samuel John Neele from a survey carried out to illustrate William Plee's Account of Jersey, published in 1817, shows defences along the coast including the New North Battery (Jersey Archive ref: L/F/120/A/100).



Neele Map 1817

By 1830 most of the defences of Jersey had fallen into disrepair as both the States of Jersey and the Board of Ordnance were reluctant to spend money on their upkeep. King William IV enquired as to the state of Jersey's coastal defences in 1831 and a report was commissioned from Lieutenant-Colonel Lewis, the Commanding Engineer in Jersey. A chain of batteries and coastal defence towers (known as Conway towers) already existed in locations where a risk of enemy landing was present but the report found that with the advent of steam-powered naval vessels able to hold their position close to the shore, even in areas previously protected by reefs, new measures would be necessary on parts of the coastline now exposed to the risk of bombardment.

As a result of this report, financial responsibility for the island's defences was regularized. The Board of Ordnance assumed responsibility for the defences on the east, south and south-west coast; and the States of Jersey took responsibility for those on the west, north-west and north coast. (Clements 1999)

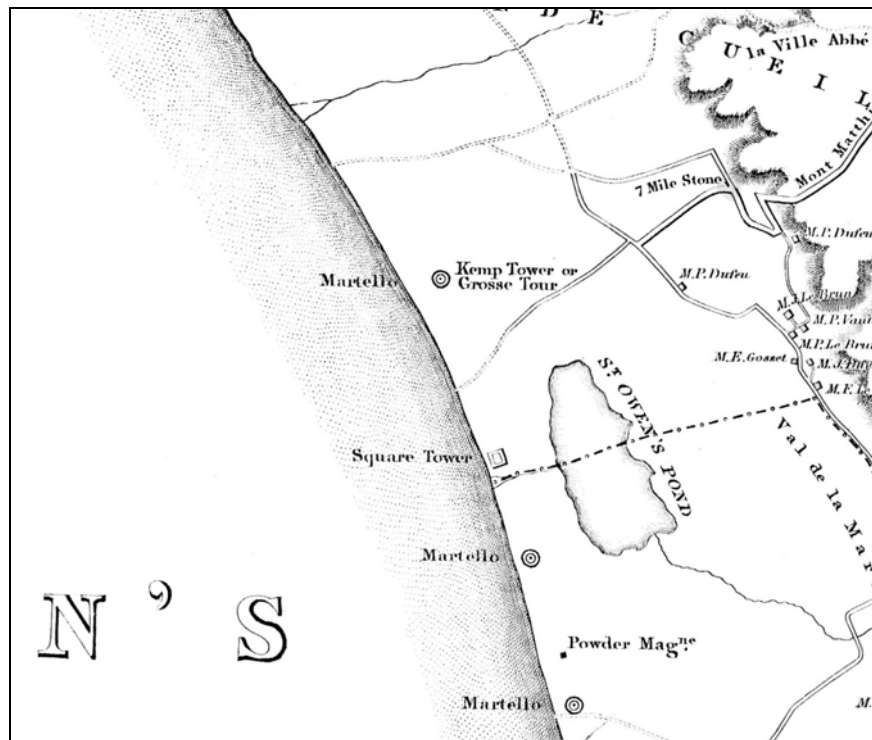
The States of Jersey ordered that work commence on the construction of new coastal defences on 3<sup>rd</sup> March 1832 and a series of towers of the English Martello pattern was built (Jersey Archive ref: C/A1/15). Part of the proposals for St Ouen's Bay was for a three-gun tower to the rear of the New North Battery. Kempt Tower, the largest example of a Martello constructed in Jersey, was built in 1834 to the standard English East Anglian cam-shaped pattern and designed to mount one 24-pounder gun and two 24-pounder short guns. It is named after Sir James Kempt, the then Master of the Ordnance, who had been one of Wellington's Generals at the Battle of Waterloo. Also sometimes known as the 'La Grosse Tour' and 'St. Ouen's No.2'.

A report by Lieutenant-Colonel Lewis CRE and Lieutenant-Colonel Sinclair CRA on 28<sup>th</sup> October 1835, records that 'Kempt Tower Battery' was armed with three 24-pounder guns, and the Tower with a single 24-pounder gun (Public Record Office ref: WO 44/76).



Model formerly displayed in the interpretation centre

The building is shown on the 1849 map of Jersey by Hugh Godfray as “Kemp Tower or Grosse Tour” (Jersey Archive ref: L/F/120/A/107)

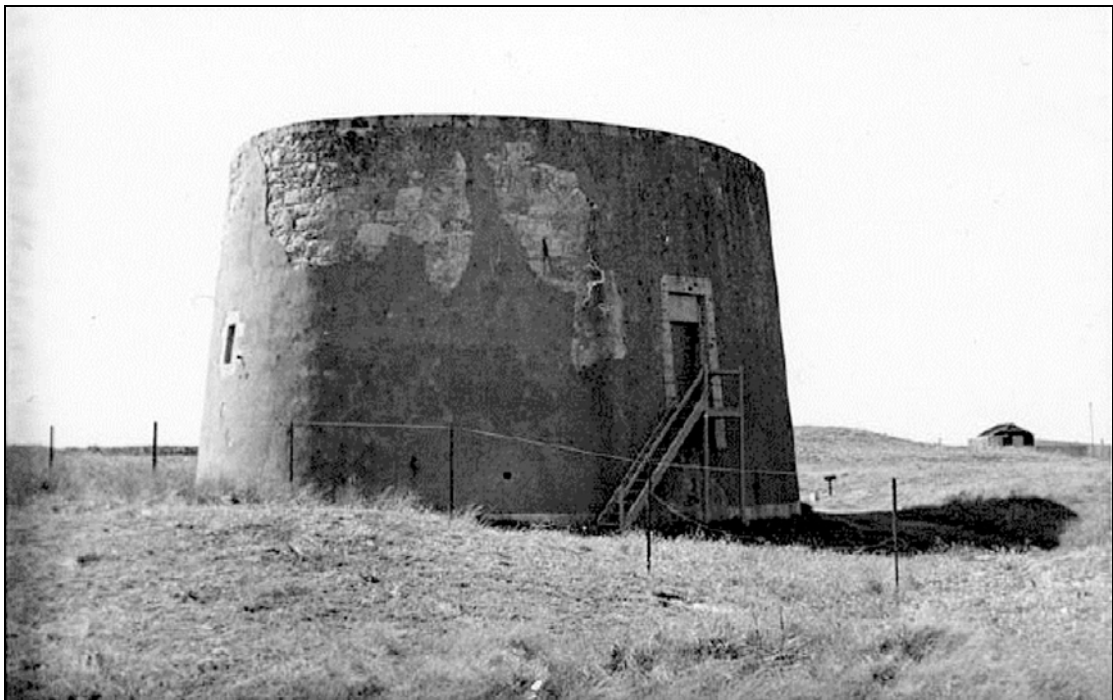


Godfray Map 1849

Kempt Tower maintained a military role into the mid-19<sup>th</sup> century, as evidenced by a Royal Engineers report in January 1848, which records three 32-pounder guns mounted at the tower (Public Records Office ref: WO 44/76). However, after 1850 Jersey was no longer regarded as a ‘fortress island’ as hostilities with France abated, and the coastal towers declined into obsolescence. A letter by Lieutenant-Governor Douglas on 10<sup>th</sup> November 1860 observed that Kempt, Lewis and L’Etac Towers required much internal repair before they could be occupied, “they have been left in a most neglected position for many years” (Jersey Archive ref: A/D2/1)

In June 1902, the War Department approached the States of Jersey to enquire if they would be interested in purchasing a number of the vacant coastal fortifications. Agreement was not reached until a few years later and exact sale date for Kempt Tower has not been established. However, a letter from the War Office to the Royal Engineer Office in Jersey in February 1909 refers to Kempt Tower as no longer being War Department property (Smith 2004).

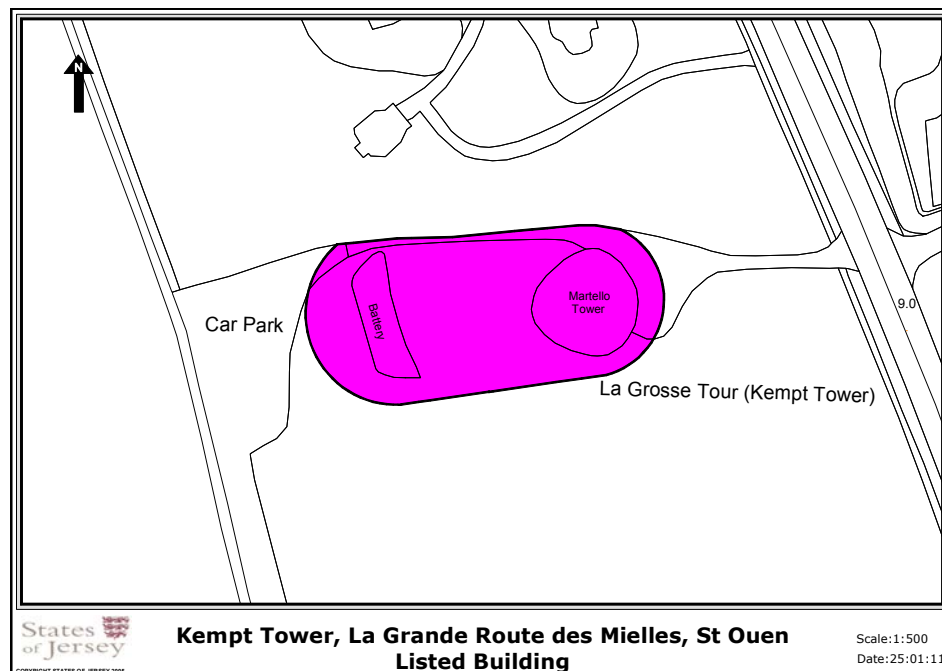




Photographs by Emile Guiton 1939  
(Société Jersiaise Photographic Archive ref. SJPA/008039 & 40)

During World War Two, St. Ouen's Bay was considered as the most likely beach for an Allied landing. The German occupying forces constructed a large number of defensive structures throughout the area including the modification and re-use of earlier fortifications, whose strategic position and robustness of construction again proved to be of military value. The Germans adapted Kempt Tower, replacing the original radial oak joist floors with steel and concrete, inserting a defendable ground floor entrance, and subdividing the roof-top gun deck. Various other positions were constructed nearby, including an anti-tank sea wall, a casemate for beach defence gun, machine gun positions, searchlight shelters and personnel shelters.

Between 1985-2010, Kempt Tower was used as a visitor interpretation centre to explain the natural environment of St Ouen's Bay. It continues to be owned by the States of Jersey and maintained on its behalf as an historic monument by the Transport & Technical Services Department. The site is formally protected as a Listed Building for its historical, architectural and archaeological significance (Listed Building ref: OU0085).



## Description

Kempt Tower is a fine example of the largest, English east-coast pattern Martello - designed primarily for mounting artillery on a roof platform. It is cam-shaped in plan with a characteristic squat and robust profile - the tower measuring 54 ft in diameter and 35 ft in height. It has noticeably battered, very thick, outer walls of exposed Jersey granite (originally rendered) with very few openings - limited to small windows lighting the upper accommodation level and a raised first floor entrance. This has a dressed granite surround inscribed KEMPT TOWER with 1834 datestone - the doorway facing away from the direction of attack and with a specially profiled threshold to enable the entrance ladder to be withdrawn from above. A ground floor

doorway and single window at magazine level - both in dressed granite - were inserted by the Germans in 1941.

The roof deck, with its very broad encircling parapet wall, was originally designed to mount three guns and is supported on a brick vault. This construction differs from the English Martello towers, which are usually entirely constructed of brick, except for certain dressings. The roof deck is subdivided by concrete walls inserted in 1941, and the floor level has been raised with modern paving laid over. A pair of stairs accesses the roof deck from the main floor below.



landward (west) elevation with original raised entrance flanked by 1941 insertions



detail above original entrance



seaward (east) elevation with battery in foreground



south elevation with detail of 1830s window (above)

Access to roof level is via a pair of granite stairs set entirely within the thickness of the external wall. The inserted German floor raised the original floor height, reducing the amount of clearance for the doorways, fireplaces and windows - with the exception of the main entrance, which retains its original level as it steps down from the room.



first floor accommodation level showing window and fireplace



first floor showing 1834 entrance (left) and doorway of stairs to gun deck (right)



stairs within the thickness of external wall

The roof platform is supported off the central pillar and brick vault below. The 1834 layout is still evident with 3 semi-circular positions within the broad masonry parapet to house the traversing guns, and various integral storage niches. German works include a concrete capping to the parapet, and concrete partition walls, which subdivide the gun deck. Post-war additions include a hood above both stair entrances and basic wooden doors. The roof deck level has also been raised with post-war concrete paving - the survival of the original granite paving being unclear.



The adjacent New North Battery is constructed of granite, with a curved wall on the seaward side, behind which are three trapezoidal areas of paved stone - each designed to accommodate a single gun.

The tower is arranged internally on three levels. At ground floor is the magazine, originally with no external openings except for small baffled ventilation slots and only accessible via an internal stone stair from the first floor - the stairs enclosed by a curving brick wall (still in situ). The German forces inserted an external doorway into the magazine in 1941 - a reinforced concrete passageway with steel blast door defended by a small gun embrasure.

Within the magazine is a sturdy central pillar finished in brickwork, and an original granite flagged floor. The 1830s radial oak joist floor above was replaced with steel and concrete by the Germans. A central lobby area allows access to various storerooms which are set against the curved outer wall, with internal granite walls.

At the base of the stairs is a dressed granite doorway which accesses a long storeroom with brick vault and supporting arch. Formed between this room and the central pillar is a brick vaulted corridor, within which is a small internal window enabling the long storeroom to be illuminated safely by candlelight. The corridor now leads into a modern timber partitioned room constructed for the interpretation centre.



magazine showing central pillar on left and stairs on right

Originally there appears to have been two additional stores on the opposite side of the lobby. The arched doorway / niche to one of these stores is bricked up and the form of the space is unclear. The brick arch of the other doorway is evident but the storage room within (since used as a lavatory) was modified in the 1940s - the Germans adding an internal concrete wall and concrete lining, with a new external opening and small internal opening with steel shutter.



magazine showing blocked doorway (left) and German blocking (right)



stairs from magazine



storeroom with baffled ventilation slot

The first floor is designed as a 'bomb-proof' vault protecting the accommodation for gunners. The walls are large blocks of ashlar granite with a central dressed granite pillar and impressive brick vaulting supporting the gun platform above. Set within the outer wall is a circuit of deep-set windows dressed with ashlar granite, and 2 fireplaces - one large to serve the main room, and a smaller version presumably to serve a smaller sectioned off area for officers. The 1834 entrance door is located on the east side of the room.





1941 entrance with machine gun position and steel blast door



1941 subdivision of gun deck



1941 radial steel and concrete floor

## Ecology

Kempt Tower is situated in the St Ouen's Bay coastal plain. Although the tower itself is not thought to provide a wildlife habitat, the coastal strip between the sea wall and Five Mile Road provides a unique series of habitats, where the blown sea spray encourages the growth of salt loving plants, many of which occur here and nowhere else in the Island including greater sea-stock, sea spurge and Alderney sea-lavender. Sea holly, childing pink and prickly salt-wort are here in far greater abundance than elsewhere, whilst yellow horned poppy, sea-kale and pyramidal orchids also occur in significant amounts. Jersey also lies on two migratory flyways and the shorelines are internationally important for over-wintering waterfowl. No Geological SSIs have been identified within the area.



Alderney sea-lavender

## ASSESSMENT OF SIGNIFICANCE

### **Cultural value**

The cultural value of Kempt Tower lies in the fabric and history of the site; its setting and contribution to the local landscape; and its role as a resource for historical, architectural and military research.

The tower and battery are significant as an integral part of a group of surviving military defences in Jersey that illustrates the changing political and strategic military history of the Island, and global trends in the history of war, in the late 18<sup>th</sup> and early 19<sup>th</sup> century through to the Second World War.

It is the largest of the series of towers of the English Martello pattern built in Jersey between 1831 and 1837. The tower was built to a design approved by the Board of Ordnance and is a good example of the power of the 'engineering architecture' characteristic of work by the Royal Engineers in the

19th century. The highest standards of construction were achieved by the supervising RE Officers and Jersey contractor Jean Gruchy and his stonemasons.

The tower substantially retains its completeness and architectural integrity as an early nineteenth century Martello tower with the structure close to its original form and physical context. It is strategically sited and can still be read in terms of its strategic defence value as originally conceived. The stone battery similarly retains its integrity.

The adaptation and re-use of the tower by the German occupying forces in the 1940s provides a direct and tangible association with events that are of outstanding universal significance.

The tower is a prominent landscape feature of scenic value – not only striking and photogenic in itself – but making a major contribution to the character of the St Ouen's Bay landscape.

### **Natural value**

The natural value of Kempt Tower lies in its coastal location in St Ouen's Bay, which supports a unique series of habitats. The site is within an area designated in the Jersey Island Plan (2011 Policy NE6) as 'Coastal National Park'.

### **Social value**

The social value of Kempt Tower is as a resource for informal recreation, as a resource for education on Jersey's military history and architecture, as a resource for inspiration - particularly painting, drawing and photography - and as a venue for community use.

### **Economic value**

The economic value of Kempt Tower lies primarily in its indirect role in contributing to tourism generally in Jersey. The tower, set within the sweep of St Ouen's Bay, being one of the area's characteristic images.

### **Statement of significance**

The Conservation Statement establishes that Kempt Tower is of significance:

- as a fortification which was part of the changing political and strategic military history of the Island, and global trends in the history of war, in the late 18<sup>th</sup> and early 19<sup>th</sup> century through to the Second World War;
- as an integral part of a group of surviving coastal defence towers in Jersey, being the largest of the series of towers of the English Martello pattern built in Jersey between 1831 and 1837;

- as an early 19<sup>th</sup> century fortification that was adapted to become part of the 'Atlantic Wall' and German efforts to turn the Channel Islands into an impregnable fortress;
- as a place designated by the States of Jersey as a Listed Building;
- as a place of special architectural, historic, archaeological and landscape value;
- as part of St Ouen's Bay coastal plain, which supports a unique series of habitats;
- as a resource for education of people of all ages - particularly on Jersey's military history and architecture;
- as a resource for inspiration - particularly painting, drawing and photography.

## **PART TWO: CONSERVATION POLICY**

This part of the Conservation Statement indicates how the various individual values placed on the site are vulnerable to loss or damage, and then proposes a series of Conservation Statement Policies, which should ensure that the range of interests at Kempt Tower are protected and, wherever possible, enhanced for public enjoyment and benefit.

The framework of policies seeks to:

- Preserve and enhance the significance of the historical remains; the surrounding wildlife habitats; and the character and setting of the site for future generations, and ensure that they are conserved in strict accordance with international best practice;
- Guide management proposals for the preservation and future development of the site as a heritage and educational asset;
- Ensure that the site can survive as a sustainable heritage asset for the foreseeable future.

### VULNERABILITY

The historic fabric is vulnerable to neglect through lack of maintenance. The tower and battery are in an exposed coastal location and subject to extreme weather conditions. Ill-maintained structures will also be subject to water ingress and salt laden deposits leading to damp conditions and damage from insect and fungal infestations as well as intrusive plant growth. Roofs and walls need to be kept in good repair and plants need to be managed so that their roots do not cause damage to the standing fabric.

The historical integrity of Kempt Tower is vulnerable to the use of inappropriate materials or methods of repair and to restoration works or new developments that are not sympathetic to the original fabric, its history, and its setting.

The tower makes a major contribution to the St Ouen's Bay landscape. Conversely the setting of the tower is important to its integrity and attraction as an historic asset. Both the local landscape and the setting of the tower are vulnerable to inappropriate development.

The remains of the tower and battery are an important resource for research. They are vulnerable to change, particularly those involving structural alterations to the fabric or disturbance to the ground, for example for the installation of services.

The natural values of the coastal area around Kempt Tower are vulnerable to loss or damage through pollution and contamination, and by excessive human disturbance.

The value of the site as a resource for informal recreation, and as a resource for education and inspiration is vulnerable to lack of access, inappropriate or poor presentation; and lack of adequate interpretation.

Damage to the cultural and natural values of Kempt Tower would impact on its economic value as a landmark and its ability to support tourism to the Island.

### CONSERVATION STATEMENT POLICIES

This section of the Conservation Statement sets out a series of policies, which are intended to ensure an adequate balance between all the values placed on the site during its ongoing management and in any future proposals to develop it; conserving Kempt Tower as a heritage asset to the highest possible standards, whilst securing maximum benefit to the community. For the purposes of the Statement, the term *development* includes repair, restoration, interpretation, and the provision of facilities to encourage and improve public enjoyment and sustainability.

#### CULTURAL POLICIES (CP1 – CP10)

The policies in this group seek to ensure compliance with international and States of Jersey laws, planning policies, principles, guidelines, and best practice concerning the conservation and development of Kempt Tower.

**POLICY CP1:** To conserve, repair, maintain and, wherever possible, enhance the buildings and remains of Kempt Tower and New North Battery in accordance with international conservation laws, policies, principles, and best practice.

Reason: The buildings and remains on the site are of international significance and it is important that the highest possible standards are applied to their restoration and maintenance

There are a plethora of policies, principles, and guidelines for the care of heritage sites and these are set out in a range of international documents. Clear policies for repair and restoration are set out in the international Venice Charter (1964) and the ICOMOS specialist charters, in particular the Australian ICOMOS Burra Charter (1979 – revised in 1981 and 1988), whilst the Convention for the Protection of the Architectural Heritage of Europe (Granada 1988) and the European Convention on the Protection of Archaeological Heritage (Valetta 1992), both signed by the States of Jersey, are more concerned with sustainable access and interpretation. The British Standard *Guide to the principles of the conservation of historic buildings* (BS 7913:1998) is a valuable standard in that it sets out general conservation principles relating to historic buildings as well as providing definitions of terminology.

The legislation and planning policy guidelines applying to Scheduled Ancient Monuments, Listed Buildings, and Conservation Areas in the UK can be

considered as setting out codes of good practice, but are not statutory in Jersey, whilst English Heritage's advisory publication on understanding historic buildings (Clark K 2001 *Informed Conservation*) makes a series of valuable suggestions.

Recommendation for implementation:

CP1.1 Ensure that staff of Jersey Heritage and its advisors are familiar with the relevant international practice and guidelines pertaining to sites of this type and seek to apply them to Kempt Tower whenever it is appropriate to do so.

POLICY CP2: To meet legal and statutory requirements having regard to Jersey Heritage's obligations to the States of Jersey to comply with the Island's laws; with policies contained in the Island Plan; and with supplementary planning guidance.

Reason: Jersey Heritage is legally obliged to satisfy these requirements in respect to the transfer to it of responsibility for the management of the site.

The Planning and Building (Jersey) Law 2002 is the law controlling development on the Island. It contains a number of relevant provisions, including Articles 50-56, which apply to Sites of Special Interest. Article 54 provides additional control of certain operations and change in use, which while not amounting to development, adversely affects the special interest of the site.

The policies pertaining to Listed Buildings and Places in the Island Plan (2011 Policies HE1 & HE5) are relevant. The Plan notes that Kempt Tower is within the Coastal National Park (Policy NE6). Planning Advice Note 6: Managing Change in Historic Buildings (2008) is also applicable to the site.

The Conservation of Wildlife (Jersey) Law 2000 makes provision for the protection of specified wild animals, birds and plants and their habitats and has been supplemented by a Biodiversity Strategy; Policies NE1 & NE2 in the Island Plan; and by Draft Supplementary Planning Guidance on the Natural Environment.

Recommendations for implementation:

CP2.1 Satisfy local planning requirements, and particularly policies relating to sites of special interest, archaeology, registered historic buildings, and biodiversity.

CP2.2 Comply with local building byelaws as far as they are relevant.

CP2.3 Comply with Health and Safety at Work (Jersey) Law (1989).

CP2.4 Comply with provisions of environmental health legislation.

**POLICY CP3: To seek to preserve the setting of Kempt Tower and the contribution that it makes to the landscape.**

Reason: The setting of the tower and the uninterrupted views of it from the sea and land are important to its historical integrity, whilst it makes a major contribution to the character of St Ouen's Bay. Inappropriate and encroaching development near to the site or in its immediate vicinity could have a detrimental effect on the heritage value of the property and its contribution to the surrounding area.

Recommendations for implementation:

CP3.1 Ensure that any proposals for permanent alterations to Kempt Tower and the approaches to it are not visually intrusive to the site and the locality.

CP3.2 Make representations on proposals for new development, redevelopment, or alterations to existing buildings in the vicinity of Kempt Tower, which would have a harmful effect on the setting of the site.

**POLICY CP4: To ensure that the structural remains of Kempt Tower and New North Battery are adequately maintained.**

Reason: Unless the remains are adequately maintained they will deteriorate, causing loss of historic fabric and integrity.

Recommendations for implementation:

CP4.1 Undertake regular condition audits of the buildings, preferably on a four or five-year cycle.

CP4.2 Identify and deal with any repairs that are considered urgent.

CP4.3 Prepare an on-going maintenance strategy, with annual programmes of repair and a phased maintenance schedule.

CP4.4 Seek to ensure adequate funding for the works.

**POLICY CP5: To ensure that all repair works and any new development are specified, supervised, and undertaken by professional consultants and appropriately experienced contractors.**

Reason: All works associated with historic buildings are specialist in their nature and they are liable to be damaged both physically and in their integrity by repairs or new works that are inappropriate in their design, use of materials, or form of construction.

Recommendations for implementation:



CP5.1 Employ professional staff and consultants to prepare specifications and to supervise all works.

CP5.2 Employ appropriately skilled contractors and craftsmen with experience of conservation work for all repairs.

**POLICY CP6:** To make decisions concerning repair and restoration based on the best available information about the original fabric and form of the structure.

Reason: The historical integrity of the tower could be adversely affected by the use of inappropriate materials or the inaccurate representation of lost features.

Recommendations for implementation:

CP6.1 Undertake appropriate levels of research prior to the commencement of repairs or restoration works. This might include archaeological recording of standing fabric to determine original form and the extent of later alterations, and the specialist study of materials.

CP6.2 If any new works are proposed which might adversely affect historic fabric, seek to mitigate those affects either by a change of design or, as a last resort, by recording historic fabric before it is removed.

**POLICY CP7:** To employ the most appropriate materials and methods of construction in all repairs and works of restoration.

Reason: The use of inappropriate materials and methods will adversely affect the historical integrity of the site and be damaging to its role as a heritage asset.

Recommendations for implementation:

CP7.1 Whenever possible, use traditional, like-for-like, materials and methods for all repairs and restoration works. It may be necessary to employ the use of specialist materials and conservation repairs techniques that may not be available in Jersey. For these reasons it may sometimes be necessary to source materials and craftsmen with appropriate skills outside Jersey.

CP7.2 The use of modern materials as an expedient during repair is not considered good practice. However, if no alternative course of action is available then they should be capable of being removed without damage to the historic fabric.

CP7.3 Identify and prepare a list for the removal of inappropriate modern materials and repairs, such as cement pointing, and their replacement with traditional materials.

**POLICY CP8:** To ensure that historic fabric, both standing and buried below the surface, and the historical integrity of the tower are not adversely affected by new development or the provision of services.

Reason: The historical integrity of the site could be harmed by the construction of new structures and the provision of services could damage standing fabric or buried remains.

Recommendations for implementation:

CP8.1 Wherever possible, additional spaces should be provided within existing structures and new buildings should be avoided.

CP8.2 Maintain and implement a strategy whereby services are installed with a minimal loss of historic fabric and in routes where they are accessible for future work. In practice this may mean that cables and pipes will be surface mounted, except where they can be laid within modern floor structures or in other accessible voids or ducts, but they should be as unobtrusive as possible.

**POLICY CP9:** To protect the architectural and archaeological fabric of Kempt Tower and New North Battery as a resource for research, and promote interest in its study.

Reason: The standing fabric of the tower and battery are an important source of information pertaining to the past uses of the site and the sequence of construction on it. It is important that these sources are protected from loss or damage until such time as it is considered appropriate that they should be properly investigated. If historic fabric is encountered during development it needs to be properly recorded along with any modern repairs, interventions, or restoration works.

Recommendations for implementation:

CP9.1 Encourage scholarly interest in the study of the tower and the site that it occupies. This could be achieved by permitting non-destructive investigations or by encouraging further archival research such as the collation of all illustrations of the tower and battery.

CP9.2 Small scale archaeological excavations should be avoided wherever possible, unless they are evaluations undertaken as a precursor to development or the provision of underground services.

CP9.3 Allow for an archaeological watching brief during significant repairs or ground disturbance, in accordance with the standards set out by the Institute of Field Archaeologists and the Jersey Heritage archaeological protocol.

CP9.4 Ensure that a record is made of all alterations to the fabric and that this is deposited in an appropriate archive.

CP9.5 Archaeological investigations should not be permitted until adequate provision has been made for ensuring that they can be undertaken to the best possible standards, in accordance with the standards set out by the Institute of Field Archaeologists and the Jersey Heritage archaeological protocol, and that objects and structures recovered can be adequately conserved.

**POLICY CP10:** To encourage the dissemination of information pertaining to the history, architecture, and building archaeology of Kempt Tower and New North Battery.

Reason: Information relating to the site, which has been derived from archival and on-site research, is only of value to the community if it is made available in a readily accessible form.

Recommendations for implementation:

CP10.1 Support the publication of material relating to the history, architecture, and building archaeology of the site.

CP10.2 Ensure that original archival material and copies of relevant studies and investigations are deposited in an accessible location, such as the Jersey Archive, or several locations.

#### NATURAL POLICIES (NP1 - NP2)

This policy seeks to ensure the protection of the wildlife interests on the site and encourage interest in them.

The States of Jersey is committed to wildlife conservation and it has signed up to various international treaties and conventions, including those concerned with migratory species of wild animals; and European wildlife and natural habitats.

**POLICY NP1:** To protect and enhance the natural value of the coastal area around Kempt Tower.

Reason: The coastal strip between the sea wall and Five Mile Road provides a unique series of wildlife habitats.

Recommendations for implementation:

NP1.1 Undertake wildlife surveys in order to establish the extent and range of habitats that exist around the site.

NP1.2 Monitor and protect existing habitats from unnecessary damage during normal visitor activities; routine maintenance of the fabric and vegetation; and during any proposed repairs or new development.

POLICY NP2: To encourage interest in the natural values of the area around Kempt Tower.

Reason: The natural interests of the site may be less well known and unless these values are brought to the attention of the local and the visiting community the site will not achieve its full educational and public interest potential.

Recommendations for implementation:

NP2.1 Draw attention, by means of interpretation and displays, to the wildlife interest of the area.

### SOCIAL POLICIES (SP1 – SP3)

The policies in this group seek to protect the range of general values placed on the site by the local community and visitors to the island.

POLICY SP1: To improve access to Kempt Tower and New North Battery as a resource for education of people of all ages, intellect and physical ability.

Reason: The site provides a valuable resource for education for students of all ages. Physical access to the site is desirable for people of all ages and abilities - it is accepted, however, that the upper floors of the tower restrict physical access. Improving interpretation will ensure that the visitors' experience is enjoyable; that a genuine understanding of the site is possible; and that repeat visits are encouraged.

Recommendations for implementation:

SP1.1 Support the production of interpretation material - including child-friendly material and information for people unable to gain access to the tower. Make this available either as hard copy or on the Jersey Heritage website.

SP1.2 Include a video description of the site on the Jersey Heritage website.

POLICY SP2: To promote and stimulate interest in Kempt Tower as a venue for community use, informal recreation, leisure and tourism.

Reason: Although Kempt Tower is a well-known heritage site on Jersey, the site needs to be advertised and promoted in order to maintain interest and ensure sustainability.

Recommendations for implementation:

SP2.1 Identify the different target audiences and the ways in which the tower can be used for community use, informal recreation, leisure and tourism.

SP2.2 Promote Kempt Tower as a target destination for community use, informal recreation and leisure activities.

**POLICY SP3: To encourage the use of Kempt Tower as a resource for inspiration, particularly painting, drawing and photography.**

Reason: The tower is of great landscape value. Enhancing its role in this area will add to its value to the community.

Recommendations for implementation:

SP3.1 Encourage the use of Kempt Tower as a teaching venue for painting and photography.

SP3.2 Hold temporary exhibitions of painting, photography, and sculpture, of subjects that have been inspired by the tower and St Ouen's Bay.

#### ECONOMIC POLICIES (EP1)

This seeks to ensure that Kempt Tower can continue as a sustainable heritage asset for the foreseeable future and contribute to the local economy.

**POLICY EP1: To manage and develop Kempt Tower as a sustainable heritage asset to the benefit of the local community and visitors to the island.**

Reason: Unless sufficient income can be derived, it will prove difficult to manage and maintain the property in an appropriate manner.

Recommendations for implementation:

EP1.1 Prepare management proposals for repairs, restoration, and new development based on available funding.

EP1.2 Manage the property in a way that maximises income from all existing sources.

EP1.3 Seek to identify and secure additional sources of revenue income.

EP1.4 Seek to work closely with the local community to ensure a good working relationship with local tourism providers.

## IMPLEMENTATION AND REVIEW

Jersey Heritage intends to implement the Conservation Statement Policies during its management of Kempt Tower and comply with them during any future proposals to conserve and develop the site.

It is also the intention that the Conservation Statement should be reviewed at appropriate times in order to ensure compliance with changing circumstances, changing approaches to conservation, and changing visitor patterns.