



## Pre-Application Advice Request

Complete this form to request pre-application advice for planning applications

1. If this is relating to a previous decision, provide the reference number

PA/2022/0062

2. Address of land or property

The Brackens

Mont Rossignol

St Ouen

Post Code:

3. Name and address of person making the enquiry

Contact:

Telephone:

Mobile:

Post Code:

E:mail:

4. Description of the proposal

Give a clear and concise description of the proposed work

Demolition of existing House, Replacement dwelling and associated landscape work

5. Checklist

	Standard information required	Yes ✓	No ✓
2	Location plan	✓	
3	Site plan	✓	
4	Photographs of existing	✓	
5	Drawings or sketch proposals	✓	

# DECLARATION

## Important information

Before signing this form, read the following consent information carefully. It explains how your information will be used and provides a brief description of your rights under Jersey's Data Protection Law. For further information on how the department handles personal data visit [www.gov.je/howweuseyourinfo](http://www.gov.je/howweuseyourinfo)

## Your consent

I am aware of and agree to the information supplied in this form, together with any other accompanying information, being used for the purpose(s) of providing pre-application advice prior to submitting an application for permission or consent as defined in the Planning and Building (Jersey) Law 2002.

I am aware of and agree that the information supplied in this form, together with any other accompanying information may also be disclosed to other departments and relevant authorities so that you can consult with them about my proposals.

This includes my name, copies of any accompanying drawings, plans and supporting letters and documents. I understand that all of the information I supply will be processed in accordance with Jersey's Data Protection Law.

I understand that as a public authority you are subject to the provisions of the Freedom of Information (Jersey) Law 2011 and that under this Law you may be required to disclose information you hold, including the contents of this form and any other information I provide to you, unless the information is protected from disclosure by an exemption under the Law or any other enactment, including the Data Protection (Jersey) Law 2018.

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- Withdraw your consent to the further processing of your information. However, this may cause delays or prevent us delivering a service to you or cause you to be in breach of other legal requirements
- Request that the processing of your personal data is restricted in instances where you believe the information being processed is inaccurate, out of date, or there are no legitimate grounds for the processing
- Challenge the accuracy of the information we hold about you and request that that it is corrected where necessary
- Complain about the way in which your personal data is being used
- Ask for a copy of the information we hold about you

Should you wish to exercise one of your rights contact +441534 445508 or [planning@gov.je](mailto:planning@gov.je) for further information.

Signature..... Date **17/10/22**

FULL NAME(S) IN BLOCK LETTERS .....

Department of the Environment  
**Planning and Building Services**

South Hill  
St Helier, Jersey, JE2 4US  
Tel: +44 (0)1534 445508



31/10/2022

Application Number PA/2022/1301

Dear Sir/Madam

<b>Application Address:</b>	The Brackens, , Le Mont Rossignol, , St. Ouen, JE3 2LN.
<b>Description of Works:</b>	Construct replacement dwelling with associated landscaping

I am writing to confirm that your recent pre application advice enquiry was received on 14 October 2022. Your enquiry has been passed on to and will be dealt with in due course.

Whilst every effort is made to ensure the pre-application advice is accurate, it must be regarded as advice only and is not the same as a formal determination under the Planning and Building (Jersey) Law 2002. The advice given is the opinion of the planning officer and will not be binding in the determination of a subsequent application.

Should it be necessary to contact us regarding your pre-application enquiry, please quote the application reference number(s) as shown above.

Yours sincerely

**Technical Support Team**

T: 01534 445508

E: [PECTSO@gov.je](mailto:PECTSO@gov.je)

W: [www.gov.je](http://www.gov.je)

**From:**  
**To:**  
**Cc:**  
**Subject:** Re: PA/2022/1301 - The Bracken redevelopment  
**Date:** 30 December 2022 11:56:36

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Dear

Thank you for your email. Considering the sensitivity of the project, would it be possible to meet you on site to discuss the proposal further before considering an application? Thank you in advance and we hope you had a joyous and peaceful christmas.

On Mon, 19 Dec 2022 at 13:10,

wrote:

Regards

----- Forwarded message -----

**From:** >  
**Date:** Mon, 19 Dec 2022, 14:10  
**Subject:** PA/2022/1301 - The Bracken redevelopment  
**To:**

Dear

I refer to the above site, and your request for pre-application advice. I have not had the opportunity to visit the site; however, you have made a detailed submission providing a good overview of the proposal.

The scheme relates to the demolition and replacement of the existing 4-bedroom dwelling. The new dwelling is also described as a 4-bedroom property. The site is located within both the Coastal National Park, and the Protected Coastal Area – the most protected landscape designations within the Island Plan.

With regard to the principle of demolition, you have provided an engineer's Structural Condition Report which suggests that there are significant defects with the existing building structure, and the recommendation is that re-building would be the most appropriate (economic) approach. The department would be minded to agree with this position.

The proposed architectural design has clearly been carefully considered (having regard to the surrounding natural context), and the choice of materials would seem to be entirely appropriate for the location. There are no concerns with the overall architectural approach proposed.

The ambition for a highly-sustainable (energy efficient) building, significantly improving on the existing structure, is to be welcomed.

It is noted that site landscaping / planting, and the overall landscape impact of the proposal, have also been given a considerable amount of thought.

However, despite these positives, the department is greatly concerned at the overall size of the proposed dwelling. The submitted Planning Statement provides comparative figures for the existing and proposed dwellings. Building footprint will increase from 150m<sup>2</sup> to 241m<sup>2</sup> (an increase of ~61%), whilst floor space will increase from 173m<sup>2</sup> to 290m<sup>2</sup> (an increase of ~68%).

Policy H9 (Housing outside the built-up area) is one of the key considerations (and, which it is noted, appears to have been omitted from the planning statement policy analysis). At part 5, the policy states the following;

*Proposals for new residential development outside the built-up area will not be*

*supported except where:*

5. *in the case of the redevelopment of existing dwellings, involving demolition and replacement, the replacement dwelling:*
  - a. *is not larger than that being replaced in terms of gross floorspace, building footprint and visual impact, except where any increase can be justified having regard to functional needs or necessary improvements to the standard of accommodation; and*
  - b. *gives rise to demonstrable environmental gains, contributing to the repair and restoration of landscape character.*

5b may be achievable; however, it is difficult to see how the scheme is compliant with 5a as it stands, given the level of increase.

In summary, whilst there is much to commend the scheme in architectural terms, we consider that the increased in size is excessive, and I do not believe that the department would be comfortable supporting the scheme at this stage, should a formal application be made.

Regards

Planner (Development Control)

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Mobile +44 (

Government of Jersey

Infrastructure, Housing and Environment | Regulation

PO Box 228 | Jersey | JE4 9SS

Text  Description automatically generated with low confidence

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**From:**  
**To:**  
**Cc:**  
**Subject:** Re: JAC 27th January 2023 - the Brackens  
**Date:** 17 February 2023 10:05:25  
**Attachments:** [R-JAC Notes 27.01.2023 - The Brackens - Review 2 - Final.pdf](#)

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Dear

Please find the Notes attached. My apologies for the delay in sending to you.

Regards

Principal Planner Historic Environment

Direct +44 (  
Mobile +44

Government of Jersey  
19-21 Broad Street | St Helier | Jersey | JE2 3RR

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**From:** @gov.je>  
**Sent:** 16 February 2023 10:14  
**To:**  
**Subject:** Re: JAC

Thanks for the gentle chase up - we are behind on getting the Notes done but I plan to send them out tomorrow.

Regards

Principal Planner Historic Environment

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Mobile +44

Government of Jersey  
19-21 Broad Street | St Helier | Jersey | JE2 3RR

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**From:**  
**Sent:** 16 February 2023 09:10  
**To:** @gov.je>  
**Subject:** JAC

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Hello

Hope you are well. Any idea on when the minutes might be sent out for the last JAC

Thank

Kind regards

Architect

# JERSEY ARCHITECTURE COMMISSION

Date of Design Review: 27<sup>th</sup> January 2022  
Online Design Review using MS Teams

## Commissioners Present:

(Chair)

(EO)

## **The Brackens, St Ouen**

### Applicant Attendees

- Client

### Planning Officers

– Regulation (Development Control)

### Policy Background

This is a pre application for a replacement dwelling in the protected coastal area. The policy allows for some demolition and replacement under GD5, the justification on demolition has been accepted in principle. In terms of land use zone Policy H9: Housing outside the built-up area would apply. There are planning concerns about the proposed size. The Policy required that the new is no larger in gross floorspace or footprint. On the proposed design the planning service have given positive feedback.

### Background

This is the second Commission design review. A summary of the updates to the original scheme that had been made in the past year in response to both the Commission feedback and that of the planning officer. To assist the project team now includes and as landscape architects to help ensure an appropriate response to the context and landscape design.

### The Scheme

The team presented a scheme with the landscape appraisal completed and site strategy including SuDS and ecological recommendations and a heritage impact statement. The aim has been to ensure an enhancement of the landscape setting, as required by planning policy.

There have been a number of improvements to the design, use of materials and overall visual impact. In this the proposed pool is relocated to the front of the house. There is further investigation into the repair and restoration of the historic hillside following the intrusions made during the Occupation. There has also been further

investigation into the reduction of both operational and embodied carbon incorporated into a deeper section with a naturally seeded green roof providing the opportunity for pollinators, foraging habitat for bats and birds and recycling the existing top soil resource. There is an enhanced arrival sequence, celebrating the main entrance and making the carport subservient. This has been facilitated by moving the footprint of the new house further east into the hillside thereby reducing its visual impact and providing a more generous public entrance. There has been a reduction in the overall floor area without compromising the lifetime home standard and response to the unique nature of the site.

The landscape design has clear parameters which protect the special qualities, restore the character and habitats and respond to this sensitive landscape setting. The proposals also aim to conserve the existing landscape heritage allowing the integration of new architecture.

The site is within the National Park and protected coastal area. The integrated landscape and seascape character appraisal set this site within the escarpment character type and lower coastal plains to the West. This is an open aspect and exposed site but does allow for different ecological and landscape characters to be created around the existing garden and cut lawns to the West. The aim is to provide a setting for the re-built larger house within the natural character of the landscape. Screening to the eastern side with greater wildlife allowing natural regeneration. The proposed green roof will be read as a coastal grassland linking it back to the restored landscape form.

The proposed pool is set into the slope with dry banks and water run off to a rain garden. The aim is to secure sustainable water management using natural percolation, including permeable hard landscaping. Foul water will be dealt with by an on site package plant. All supporting service requirements for the proposed pool will be dealt with buried within the landform and proposed house.

The house is a new dwelling with an increased floor area in comparison to the existing house but, it is contended the visual impact is considerably reduced. There are repairs and restorations to the landscape including the restoration of the denuded rear contours. By adding floor space into this new restoration the applicant maintains that the visual impact is mitigated. There is now one bedroom suite set above the plinth with overhangs and new PV's to help reduce operational energy requirements. This new piece appears as a 'nest' on top of the garden, in a robust material which also is claimed to recall the war time (pillbox) bunker. It is shielded against the North East focusing on the better western views and it also manages to turn its back on adjacent neighbours. The proposed overhang provides outside protected amenity and solar protection, it sits on top of the box reflecting the lower bands.

The aspiration is to reuse the excavated stone to embed the house into its place. The roof will be a planted roof - an assist in disguising the house further.

#### Response of the Commission

The Commission's response will use the six C's to help structure the feedback following the review of the scheme presented.

#### Context

It is refreshing to see the design team start with the landscape in this outstanding and sensitive site. The thoroughness of the appraisal and research is excellent. The soil

and geotechnical survey and thinking about microclimate are all key to success to ensure that the landscape is integral to the design.

The cut and fill needs to be carefully presented in future to the planning service as the Commission are unconvinced the level of cut appears can be reused on site.

The design statement suggests that as a visually neutral meadow with a set back, single storey dwelling above is perhaps challenged in the way that it is presented in the images where it reads more as a two-storey new dwelling that's potentially and partially earthbound. Whilst there are elements below ground a substantial portion is above ground. Using the existing ridge of the duo pitch bungalow to help justify the height is perhaps misleading as it is clear that the massing of the two separate buildings are not comparable.

There may be benefit in another physical model as the original model shown in the design statement does minimise the proposed popup nest which in this iteration appears to have grown in visual impact, a reduction in scale may be helpful.

### Connectivity

There are concerns about the proposed highway alteration to the entrance at the bottom of the lane which will potentially damage the existing landscape character quite significantly. It is understood this is a tight turn but, this is a longstanding situation. Perhaps the inconvenience of being able to only turn left out of the driveway is better to keep rather than significant highway engineering works to facilitate a right turn thereby damaging the character of the lane and advertising the development.

### Community

What community benefit can the scheme offer?

The aspiration for the landscape setting is understood, but as raised last time, there is a concern that the presence of the house will inevitably suburbanize the surrounding natural landscape setting. The new pool, paving, parking and roof coverings will not be mitigated by green roofs.

The road entrance works as noted above, will announce a significant intrusion into the existing setting. Potential additions of retaining walls, gates, lighting, signage etc need to be explained.

### Climate

The energy strategy may be assisted by a ground source heat pump system but that requires land disturbance and a plant room. The underground works proposed involve significant amounts of excavation and concrete works creating carbon impact and issues of where and how arisings are disposed. Is there scope to explore use of rammed earth walls to utilize arisings and save on importing material?

The PV array on the roof adds another layer of artefacts which need to sit better together than they do presently. A fuller exploration of the project's sustainability agenda is required; integration now is essential.

The extensive glazing provides great views out but invokes need to manage solar gain. The overhangs may help but as shown with top side paving added, they add to a sense of uncomposed intrusions into the landscape. Analysing the form, function and detail of these would help the character. Some solidity, which could be with

sliding screens, might achieve privacy, reduce light spill and solar gain, and add thermal comfort, and more genuinely reference occupation/bunker structures.

The proposition within the design statement suggests that the scheme is sustainable and carbon neutral and may help outweigh other planning policy issues. In that regard, the first assessment is demolition in terms of embodied carbon balanced against the imposition of new carbon hungry materials. This may suggest that carbon neutrality has not been reached. If the planning policy scales are finely balanced with the sensitivity of the site being highly significant and the argument is made that carbon neutrality is the tipping point this needs to be embraced and properly evidenced.

### Character

As discussed at the last review, the composition suggests the rooftop extension is the sculptural object sitting on the landscape plinth. There are references to it being a nest or bunker but it is still thought to sit uncomfortably and to not fulfil the design intent. Further work on this and the restored landscape aesthetic appear the essential next move.

The aspiration for a biodiverse roof is an aspiration that needs landscape designer input. Currently, it looks too much like planters on a greened balcony, rather than integrating it with the wider site. Planting references are needed to demonstrate commitment to the indigenous or native vegetation design idea for this new but 'restored' landscape. It is a fundamental part of the design required to attempt to achieve planning permission.

The suggestion the roof might be part of the coastal grassland is seemingly at odds with the character of the surrounding scrubby landscape. The soil characteristics - depths and types and drainage - will need to be mimicked to achieve the outcome intended, so technical details are essential to support an application.

There is an inherent tension between rain gardens and dry banks. The proposal needs to be clear that these are dry gardens which will deal with inundation. It is noted that the strategy does deal with sustainable urban drainage systems, cascading to minimise the runoff. Managing any neighbouring effects of such a runoff downhill will need assessment.

The internal layout is personal to the owner but does require visitors to walk through the bedroom zone so might the north side wall of that corridor be conceived as a gallery wall?

Given the landscape ideas require 'blended' verges the technical resolution of balustrades, safety handrails/latch lines, access ladders etc need convincing solutions now.

At the moment, the scale of the house is made to look even bigger than last time with pool extending the footprint, the bold horizontals in the images and the earth works impacting across a large area. The idea of making the ground level more 'of the ground' might clarify the composition and prevent it from looking like a two-storey house pushed into a hill.

### Change

Thinking about future change, will an occupant suburbanise it adding new elements into the garden? Understanding where the domestic accoutrements go needs to be

carefully considered and designed in now. In the first review you are very clear that there is a public view from the air, managing change from that perspective is important.

### **Conclusion**

The ambition is understood but the floor area uplift of 50% is significant and does challenge the policy in this highly sensitive part of the island. The narrative needs strengthening, the energy, landscape and material strategies need to mature and clarity on how the cut and fill is managed on site.

The landscape led approach is entirely positive, but detail design input is needed to help prove the development can sit well and soon become part of the natural regeneration that heals this inevitably intrusive act of construction.

The landscape analysis was exceptionally thorough and much appreciated. The sustainability propositions need equal rigour to justify in policy terms the floor space uplift in this highly sensitive landscape setting.

### Key Diagrams



