

Jersey Architecture Commission

Annual Report 2020 – 2021



JERSEY ARCHITECTURE COMMISSION



Front cover

*Jersey Design Awards 2019 - Best artwork in the public domain – Award
World War One Memorial, St Helier - Siobhann Macleod, Axis Mason*

Jersey Architecture Commission's purpose

The Jersey Architecture Commission was established by the Minister for the Environment in 2012. The JAC is in place to provide an external, independent forum for Jersey through which the promotion of good architecture and urban design is delivered.

The Commission offers a robust design review process which is targeted in its advice, critical in its assessment and articulated in agreed written Notes submitted to the Design Teams following each formal Review. The process and conduct of the Commission are set out in its Terms of Reference.¹

Commission's work in 2020 to 2021

In 2020 it was agreed with the Minister that the Commission would:

- engage with major projects such as Our Hospital Project,
- engage with the emerging Island Plan,
- work with the Regulation (Development Control) team on design excellence, and
- issue an annual report.

The only element that has not progressed, but is planned, is further engagement with the Regulation (Development Control) team. The impacts of Covid-19 curtailed in person meetings and pressured the service, limiting discretionary time to engage with the Commission.



*Jersey Design Awards 2019 – Best un-built scheme
Café, Le Pulente, St Brelade – Tim Skudder Architect*

¹ [Jersey Architecture Commission](#)

Serving Commissioners 2020 – 2021

June Barnes
David Gausden
Antony Gibb
Johanna Gibbons
Sara Hart-Bricknell
David Levitt OBE
David Prichard
Lynne Sullivan OBE
Andy Theobald
Chris Twinn
Mike Waddington

Specialist on call

John Desmond

David Prichard was appointed as Chair of the Commission in 2020. A biography for each Commissioner is provided in Appendix A.

Covid-19 Impacts

Other impacts of Covid-19 in 2020 and 2021 were the transfer of the work of the Commission online. Pilot design reviews were used to test the viability of this and proved positive which has allowed all JAC meetings to be run in digital form from March 2020 to November 2021.

There have been issues with the digital format as site visits have not been possible and three of the new Commissioners have not been able to travel and familiarise themselves with the Island. The benefits have been the ease with which the Commission has been called to consider major projects at short notice. Formal meetings have continued virtually with Commissioners and the design teams rising to the challenges.



*Jersey Design Awards 2019 – Award - Best small scale building extension
Fort Henry, Grouville – Tim Skudder Architect*

Design Reviews

In the last two years the Commission has reviewed a wide range of projects and issued 20 Design Review Notes on 16 schemes in 2020 and 24 Design Review Notes on 13 schemes in 2021. The Commission held 5 formal sessions in 2020 and 6 in 2021. In addition, the Commission met the major project design teams for the Waterfront and Our Hospital Project on 12 occasions.

2020

Our Hospital Project (3)

Waterfront, St Helier

Clare Street, St Helier

, St Lawrence*

Mayfair Hotel, St Helier

57 New Street, St Helier

8 – 9 Esplanade, St Helier

Seacliff, St Martin (2)

Ann Street Brewery, St Helier*

Chalet des Arbres, St Brelade

Rose Lea, St Martin*

Cyril Le Marquand House, St Helier

Millbrook House, St Helier

The Limes, St Helier

Savoy Hotel, St Helier*

Romany Café, St Mary

2021

Our Hospital Project St Helier (4)

Waterfront, St Helier (4)

Norfolk Lodge Hotel, St Helier*

South Hill, St Helier (2)

Clifton Care Home, St Saviour*

Savoy Hotel, St Helier*

, St Helier*

Commercial Buildings, St Helier

Water's Edge Hotel, Trinity (2)

Millbrook Depot, St Lawrence (2)

Snow Hill Lift, St Helier (2)*

, St Lawrence*

J1 Broad Street, St Helier*

** indicates the scheme has not yet been released to the public domain via a planning application and scheme name will be redacted in the published version of the Annual Report*



*Jersey Design Awards 2019 – Award - best medium to small scale building or extension
Sycamore Cottage, St Mary – Godel Architects*

Design Surgeries

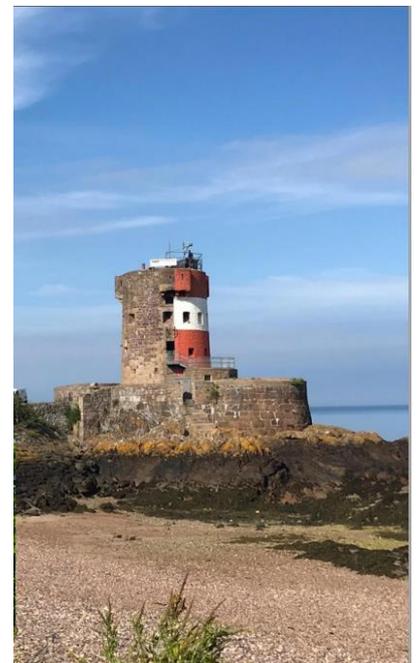
Design surgeries offer a workshop/discursive environment to review the design and site constraint challenges. The informal advice is offered to officers to assist in bringing forward amendments to deal with identified issues.

The Commission trialled design surgeries with Regulation (Development Control) officers in early 2020 which proved helpful. Sadly, this was curtailed by the impacts of Covid-19 and the lack of in-person meetings.

Association of Jersey Architects

The Chair and Executive Officer met representatives of the AJA Council in early 2020 where support for a more agile way of working, more frequent reviews (including design surgeries) were supported. The use of the 6 'C's (defined further on page 7) was presented to the AJA in February 2021 to help explain the work of the Commission. The Association sought a more flexible route to engage with the Commission. It was suggested that there would be merit in showcasing past schemes to demonstrate the success and challenges of design review. The Commission have found more agile ways of working within the challenges of Covid 19 restrictions but have not taken forwards a showcase of past work. This report goes some way towards this but a more visual product online may be possible.

The Commission continues to engage with the AJA to bring forwards the postponed 2021 Design Awards as well as talks from Commissioners on their wide area of skills and knowledge. The challenges of in person meetings and gatherings has curtailed this ambition in 2020 and 2021.



*Jersey Design Awards 2019 – Award - Best remodelling
Archirondel Tower, St Martin – Antony Gibb*

Major Schemes

The Commission has engaged with two major schemes over the last two years. Both are now live planning applications. To ensure consistency small subgroups of Commissioners were formed.

Our Hospital Project

The Commission has engaged with the OHP design team since 2020 offering a role as critical friend. The brief has made this a very complex project because of the site constraints, the volume of buildings required, and the issues regarding the location. The Commission has continued to offer clear unambiguous advice to assist both the design team and Regulation (Development Control) officers in bringing forwards a scheme. The planning application was submitted in mid-November and is being evaluated prior to being heard at a Planning Inquiry in early 2022.

Waterfront

The Commission has met with design team throughout the development of the project. It has encouraged the team to keep landscape at the heart of the scheme, to question the transport assumptions, to justify the heights proposed, to establish an exemplary response to the climate emergency and to achieve the aims set out in the South West St Helier Planning Framework. The planning application is being evaluated in early 2022.

Jersey Design Awards

The Design Awards were due to run in 2021. With agreement of the Minister these were postponed to 2022 in response to the global pandemic impacts and the demands on the planning team delivering the Bridging Island Plan (BIP). The Commission's bi-annual design awards have seen some excellent new residential and other developments. There is scope to adapt the categories to highlight schemes that address the Island's climate agenda and introduce a new one focussing on community benefit. The latter is in line with emerging policy in the BIP.

Work is now in hand to hold the Awards in 2022. Nominations will be drawn from completed projects in the last three years with special emphasis on the Sustainability Award. Entrants will be asked to evidence their engagement with the local community in designing and delivering their schemes.

Working with the Association of Jersey Architects the Commission plan to open the application process in March, judge the entries in July and make the Awards in September.



*Jersey Design Awards 2019 – Award - Best large scale development
Logie Point, St Brelade – Carlo Riva Architects*

Draft Bridging Island Plan

The Commission offered informal advice to the Minister for the Environment on three topics - housing, design and sustainability. The paper submitted forms Appendix B. These were recurring themes from the past and recent reviews where advice was given on layout, local identity, height, future management and urgency to address the Island's climate ambition of carbon neutrality by 2030.

The Commission made the following overall observations about the Draft Bridging Island Plan:

- **SPGs** – many are mentioned and will be needed soon to pre-empt emergence of unwelcomed schemes. The Commission is willing to assist in scoping, shaping and testing SPGs.
- **Jersey Design Guide** – written in 2008 this needs updating to address carbon neutrality and take account of current good practice, including references to JAC awarded schemes.
- **Jersey Housing Design Guide** – one is needed. Housing design, parking standards, amenity space & bike storage topics should assist behaviour change with a focus on carbon reduction. The HDG should pull together all the relevant policies and planning requirements that relate to housing design. Clear guidance would help applicant teams and their clients in the design process, and assist Planning Officers in assessing schemes.
- **Exemplars are needed** – of less car-centric and more sustainable residential developments. Can competitions be held, and built, to raise expectations and make urban living a preferred choice?
- **Existing Building Stock** – applying Passivhaus standards to new social housing is excellent, although the Commission would propose this standard applies to all housing. The Plan is silent on the bigger prize which is upgrading the existing building stock to reduce carbon emissions when brought forwards for development.
- **Conservation areas** – their introduction should help retain Jersey's heritage and character.



*Jersey Design Awards 2019 – Award - Best refurbishment of an historic building
Pitt Street, St Helier Antony Gibb*

*Jersey Design Awards – Award - Best landscape architecture project
Pitt Street percent for art, Axis Mason*

Other issues arising

Process

- The mix of in-person and online meetings is planned, alternating bi-monthly meetings so JAC input can be available more readily. The timeliness of reviews is crucial for applicants.
- A new annual virtual session with Planning Officers to receive their feedback on processes, upcoming issues and AOB is proposed to help coordinate the Commission's work with the Regulation (Development Control) team.
- Bringing schemes for review at an early, even viability, stage would foster future engagement with the Commission.
- Many of the proposals being brought through the planning process are not fit for purpose and will result in the loss of the Island's character and produce homes which may not remain desirable.
- Surgery/workshop sessions will be held in person, linked to on-Island meeting dates.
- The Commission often has conversations with applicants who find it difficult to understand the design standards and constraints on new development and retrofit and who therefore waste time and resources on proposals which are unacceptable. The Commission will assist in supporting planning guidance and in producing a new Jersey Design Guide and a Jersey Housing Design Guide.
- The value of competitions is well reported. The Commission strongly encourages providers and developers to hold competitions working within planning guidelines. The outcomes of the Waterfront and South Hill competitions should be analysed to discover the lessons learned for Jersey.

Themed issues using the Jersey 6 C's

Context

- The JAC ask that scheme presentations set the scene with plans, sections and elevations that stretch beyond the client's red line so as to illustrate the existing and proposed buildings in their broader context. The JAC terms of reference and invitations will in future request such inputs.
- Tall Buildings, as defined in policy, should require a 'Tall Buildings Strategy and Impact Appraisal' based on a defined urban design and architectural strategy aligned with the local vision for an area. Techniques such as characterisation and height studies provide evidence to support a local height definition for taller structures and identification of appropriate locations for singular buildings or clusters. This Appraisal would explain the many urban design issues and the development economics issues of viability, off site costs, future management, re-purposing and deconstruction.
- The Commission would ask that all applications, integrate a landscape proposal which sets out how the scheme, as a minimum, retains and preferable exceeds required bio-diversity net gain requirements, enhances the wider context and distinctive character and integrates natural features and natural assets as well as increasing climate change mitigation capacity.
- Given the pressures for new dense housing in the BIP, density will need to be referenced in each site's development brief aligned to a new Housing Design Guide or other guidance. Attention needs to be paid to the layout and mix of tenure and sizes of homes, especially at higher densities.

Connectivity

- Where housing schemes are in urban areas provision of cycle storage space at ground floor level should be mandatory along with charging for electric bikes. Such topics would form part of the Housing Design Guide.
- Pedestrian routes must be attractive and safe – they are the arteries of the community. Walking and cycling routes to key facilities should be tracked on context plans.
- Anticipating future movement modes and patterns will encourage reduction in the number and location of private car parking spaces.

Community

- To raise the health and wellbeing levels of new development the internal space standards and management systems should be part of planning approval process. This will involve preparing specific guidance notes on design quality, amenity space, placemaking and so forth.
- Anticipating housing management issues at the design stage will reduce costs and maintenance issues later.
- Welcoming and safe external and internal circulation spaces, access to amenity space, play areas, creche and support services are fundamental ingredients for creating a sense of community and pride in place.
- In finding ways to meet future housing needs the role of right sizing will need a policy response and an appropriate housing mix response when considering applications. Further detailed points were made in the Commission's comments on the BIP.
- Placemaking will require the involvement and engagement of the community to set the future vision and aspirations. This could be in the form of a community enquiry exercise looking at competing strategies.

Climate

- The JAC terms of reference are updated to ask that both landscape and climate change considerations are addressed in all submissions. Such considerations are now urgent to achieve carbon neutrality by 2030.
- Site planning that maximises the opportunity for integrated green infrastructure and natural climate solutions will be called for.
- The practice note on design statements should be updated to articulate this requirement to enable decision makers including officers and committee members to appreciate the proposals in the light of the carbon neutral agenda.
- Further guidance on the need for sustainability statements will be essential to ensure this document accompanies major and sensitive planning applications.
- Sustainable drainage and management of water and flood risk need very early consideration in the design process. SuDS should be seen as an opportunity to evidence and highlight water movements through a site for the benefit of biodiversity and amenity as well as for water management and to enhance water quality.
- The proposed introduction of Passivhaus will require a programme of help and education for all parties in the development process, officers and committees included and will go some way to deliver Jersey's targets on climate change and carbon reduction. The JAC stand ready to assist.

Character

- The adoption of the St Helier Urban Design Character Appraisal 2021² as future guidance will help deliver appropriate designs. The JAC will be asking designers of schemes within the SHUCA's scope to explain how the Appraisal influenced their designs.
- The JAC will insist upon, and ask that Regulation (Development Control) officers, insist on design statements offering narratives on the approach and logic for design decisions in their pre-application requests for major schemes or those in sensitive settings, including the historic built environment.
- The design narrative needs to be at the core of a project's Design Statement. This could assist decision makers in shaping their reports and defend recommendations and decisions.
- All new schemes that exceed the height of their surroundings should be modelled in block form for every pre-app discussion, subsequent meetings and presentation to the JAC. Physical models are well understood by the public as are inserts into St Helier's 3D town digital model.

Change

- Buildings need to be able to adapt over decades to avoid wasting embodied carbon. This 'C' is a thought-provoking agenda item to prompt reflections such as what future use is there for underground car parks, and how will homes be upgraded for CZ30. Consideration of how buildings might need to be re-purposed in future decades should be encouraged at the briefing stage.
- Contemplating behaviour and societal changes will help identify pressures and potential changes necessary in future. Lifetime homes standards and minimising basement parking which could become obsolete and unusable space are examples of this approach.
- Landscapes are dynamic and demonstration of long-term governance strategies to nurture change into the future will be required.

These and other emerging issues will be reported in subsequent Commission Annual Reports to record progress.

Conclusion

The Commission has responded positively to the challenges of working online and continues to deliver high quality objective reviews. The Hospital and Waterfront have necessarily taken a lot of the Commission's time and resource over the last two years. In all reviews the Commission strives to raise the quality of placemaking, design and to deliver sustainable developments that will be appreciated by future generations. The success of this approach will, it is hoped, be evidenced in the 2022 Jersey Design Awards.

*Executive Officer
With contributions from the Chair and Commissioners
Jersey Architecture Commission
09/02/2022*

² [St Helier Urban Character Appraisal Review 2021](#)

Appendix A

June Barnes

June is the Chair of Hornsey Housing Trust, based in North London. She is a member of the Design Panels for the London Borough of Redbridge, the London Legacy Development Company, Cambridgeshire and Greater Cambridgeshire. She was an Independent Board member of Urban and Civic plc for over 6 years until January 2021. Urban and Civic are master developers with a number of major strategic sites within 100 miles of London and a pipeline of 40,000 homes. In the past June has been a member of the London Mayors Design Advisory Group (MDAG) which advised the Mayor on design issues and the review of key major developments. She has a Diploma in Urban and Regional Planning and a post graduate Qualification in Housing.

David Gausden RIBA, FCSD

An architect who is a Director of Design Engine Architects based in their Winchester Studio. He has an expertise in the education sector and has worked in Guernsey since 2003 on educational and residential schemes. He has taught throughout his career as a visiting tutor and critic. He is a member of the Coastal West Sussex Design Panel and regularly takes part in, and contributes to, design forums. He has an interest in design within a broader context particularly interior, furniture and exhibition design.

Antony Gibb Dip Grad Cons (AA), RICS, MCSD, IHBC

A Chartered Building Surveyor with a background in archaeology, design, construction and planning. Following a post-graduate diploma at the Architectural Association, he has specialised in the repair of historic structures, working first for Caroe & Partners Architects in London and since 1999 as principal of his own practice, carrying out work in Jersey and the UK.

Johanna Gibbons RDI FLI FRSA BA (Hons) LArch

Johanna is a Landscape Architect and Fellow of the Landscape Institute and the RSA. Jo was named a Royal Designer for Industry for her 'pioneering and influential work combining design with activism, education and professional practice'. She is founding Partner of J & L Gibbons Landscape Architects and founding Director of social enterprise Landscape Learn. Jo is a core research partner of Urban Mind with Kings College London and independent commissioning foundation Nomad Projects. She is a member of the Historic Places Panel for Historic England, advisor to the Forestry Commission and a Trustee of Open City. She publishes and lectures widely.

Sara Hart-Bricknell RIBA BA Hons Architecture PG Dip Architecture with Conservation PG dip Town & Country Planning

A sole practitioner local architect & planning advisor who works on all aspects of residential design and development with a particular interest in the union of modern and traditional forms, building legibility & Passiv standard building form and practice. Previous roles have included Senior Planning Officer and Department Architect for the States of Jersey.

David Levitt OBE MA RIBA FRSA

An architect who has specialised in all aspects of housing design with a particular emphasis on housing standards in both the private and social housing sectors. He is a founding member of Design for Homes a "not for profit" company dedicated to promoting good design and construction throughout the industry. For the last 20 years he has been one of the two nominated RIBA assessors on the judging panel for the Housing Design Awards. His most recent advisory role has been as a member of the Mayor of London's Design Advisory Group.

David Prichard

David is an architect. He co-founded Metropolitan Workshop in 2005 and prior to that MacCormac Jamieson Prichard Architects in 1972. He has led numerous prestigious commissions and received awards for urban planning, civic buildings and residential projects in sensitive contexts in UK and abroad. Community engagement and inter-disciplinary teams have been at the core of his working method. He chaired the Civic Trust Awards panel for 12 years. He is vice chair of the Cambridgeshire Quality Panel and the new Greater Cambridge Design Review Panel.

Lynne Sullivan OBE RIBA

Lynne is an architect and recent Chair of RIBA Sustainable Futures, representing the RIBA as Climate Change Ambassador at COP21 in Paris. She founded sustainableBYdesign, finalists in all three BRE-sponsored UK Passivhaus prototype housing competitions. She has authored and chairs policy advice and research on sustainability in the built environment for UK governments and others. She chaired two reviews of energy efficiency regulations for the Building Regulation Advisory Committee, is a member of the Independent Commission on Climate for Cambridgeshire and Peterborough and sits on the UK government's Green Construction Board. Lynne is an invited judge on many built environment awards and is a RIBA Competitions Design Advisor.

Andy Theobald BSc (Hons) BArch (Hons) RIBA

A practicing architect, partner and studio leader at Fielden Clegg Bradley, the 2008 Stirling Prize winners (the highest accolade in British Architecture), he also has experience in presenting to Design Review Groups and sits on the CABE School Design Panel.

Chris Twinn

Chris is a design engineer who is a sustainability specialist in the built environment. He has contributed to many leading-edge projects including BedZED. His practice aims to give all projects a route to zero carbon, 75% better than UK building regulations energy use, and for various projects abroad - seeking zero carbon, water autonomy and as low as 10% car usage. He is a member of the Design Council, various design review panels as well as the EDGE think tank committee and is a non-exec director for the Sustainable Development Foundation.

Mike Waddington BA (Hons), Dip Arch, RIBA, FCSD

Mike worked with Nicholas Grimshaw & Partners and Will Alsop in London for 10 years from 1986 to 1996, before leaving to live in Jersey, where he established Waddington Architects, Interiors & Landscape. He has designed and delivered multiple high-profile projects from inception to completion and enjoys client-focussed, design and placemaking-led projects which aim to improve everyday life for Islanders. Mike's practice search for historical, environmental and site-specific 'clues & connections', as activators of their 'contextual contemporary design' process.

Specialist On Call

John Desmond BSc (Bldg Econ), FRICS, MCI Arb, FRSA

A chartered surveyor and building economist who has been advising on the economics of development in both the private and public sectors for the past 40 years. John was Managing Director of Bernard Williams Associates a surveying practice in London, Leeds and Dubai for over 25 years. His expertise covers all aspects of development economics including land valuation construction costs as well as facilities costs and he brings a holistic approach to development appraisals.

Appendix B

Jersey Architecture Commission
C/O Executive Officer³
Strategic Policy, Planning and Performance
19-21 Broad Street
St Helier
Jersey
JE2 3RR

26th November 2021

Dear Minister,

The Jersey Architecture Commission wanted to ensure their views on the Draft Bridging Island Plan were considered. In agreement with the Island Plan team we submit the attached commentary to you and propose to copy this to the Programme Officer to hopefully be taken into account by, the Inspectors when the Examination in Public recommences next week.

The Commission's focus has been primarily on Housing since it is one of the Island's top priorities and is a sector about to go through significant changes. We wholeheartedly support the introduction of Conservation Areas. As you may know, England has created 10,000 since 1967 and along with Green Belt it is one of the few planning policies that is visible and which the public understand and appreciate. We urge the designation is for more than the one trial area currently proposed.

Our opinion on the building height issue is to adhere to the current 5 storey level because it has already been exceeded and when an appropriately worthy application is made in future the current level would strengthen the case for design excellence to be achieved.

A key concern we have is the evident need for more resources to administer the Plan's ambitions. The Island's building industry will be stretched to cope with the hospital, the waterfront and the CZ30 targets need specialist support.

Please may a meeting with you be arranged for Commissioners to discuss these and other issues in early 2022.

Yours sincerely

David Prichard

Chair, on behalf of Jersey Architecture Commission

³ Return address T.ingle@gov.je

Jersey Architecture Commission

Observations on the draft Jersey Bridging Island Plan and some proposals

Overview

The Jersey Architecture Commission (JAC) considers that the draft Jersey Bridging Island Plan is comprehensive and thorough and is written in a readable manner for public and technical readers. The JAC fully supports its intentions.

The Commission welcomes the overall direction of the plan and sees its approval and delivery as critical to the well-being of Jersey and its people. The plan responds thoughtfully to the issues the island faces and takes account of improvements that have been made to the design and creation of some new places and housing on the island.

Jersey has set a bold challenge round climate change - 'CZ30'. To deliver this will be a 'race' and to 'win' would be a triumph of good governance. The Commission believes that the targets for this have to be an integral part of the Bridging Plan.

The publication of the Carbon Neutral Strategy (2019)⁴ outlines the need for reduced energy use, energy security and resilience and affordability, yet there are no quantified end goals or indication of its steep trajectory, as is needed for guiding development. The context is rapidly evolving with France reducing its nuclear generation capacity, a switch to renewables expected to constrain peak demands, and limited alternative CZ supply options. Aligning the Bridging Island Plan to this emerging context will potentially need multiple review steps of the Plan's framework to meet 2030 targets given the modest starting step proposed

We are mindful of the resources currently available to the Place and Spatial Strategy team and would suggest that to ensure the Bridging Plan becomes a living, breathing document that consideration is given to consultancy help:

- In developing supporting planning guidance and in producing a new Jersey Design Guide and a Jersey Housing Design Guide.
- Aligning the Bridging Island Plan to the Carbon Neutral Roadmap⁵. We understand the Carbon Neutral Framework, to be published shortly, will start to help with the challenge although another review of the Plan's framework may be needed to meet 2030 targets.

About the Commission

The Commission benefits from a pool of practitioners with experience across many of the design disciplines involved in development and is willing to assist the Minister and the SPPP policy and IHE regulations teams in delivering legacy developments that future generations will appreciate.

The notes on Jersey website make the JAC's purpose and processes clear⁶. The Commission sees its role as one of 'critical friend' encouraging high standards and assisting the Planning Department to achieve best outcomes. The design review process encourages applicants to investigate their brief and site and look beyond their red line to consider the likely impacts of their decisions on others now and in the future.

The Commission's experience in recent years is that:

- The Commission's biannual design awards have seen some excellent new housing/developments
- Regrettably, many of the proposals we see being brought through the planning process are not fit for purpose and will result in the loss of the Island's character and produce homes which will not remain desirable

⁴ [Carbon Neutral Strategy \(gov.je\)](#)

⁵ [Evidence for the Carbon Neutral Roadmap \(gov.je\)](#)

⁶ [Jersey Architecture Commission \(gov.je\)](#)

- Often schemes are seen very late in the project programme which frustrates the applicant and may deter future engagements.

To improve this the Commission proposes:

- a) Virtual sessions be held alternating with bi-monthly on-island meetings so JAC input can be available more readily.
- b) Annual virtual session with Planning Officers to receive their feedback on processes, upcoming issues and AOB
- c) Surgery/workshop sessions be trialled
- d) Proposals are also suggested in response to the Bridging Island Plan (set out below).

DETAILED RESPONSE

Some headlines:

SPGs – many are mentioned and will be needed soon to pre-empt emergence of unwelcomed schemes. The Commission is willing to assist in scoping, shaping and testing SPGs.

Jersey Design Guide – written in 2008 it needs updating to address CZ30 and the content of the Bridging Plan with references to JAC awarded schemes and other good practise. Residential schemes should be accompanied by floorspace, unit numbers and sizes as a schedule, which should be updated to reflect amendments made in the life of the application. This enables all to make proper comparisons.

Jersey Housing Design Guide – JAC believe this is needed and covers many of the themes in the Bridging Plan including guidance on housing design, conservation, parking standards, amenity space, green infrastructure and provision for car parking and bike storage. The Housing Design Guide should pull together all the relevant policies and planning requirements that relate to housing design. It would help architects and other building consultants designing housing, developers building homes and officers of Jersey in the Planning team by providing clear and coherent guidance

Currently the Commission often has conversations with architects and developers who are finding it difficult to wholly understand the design standards and constraints on new development and retrofit and who, therefore, waste time and resources on schemes which are unacceptable. We believe the guidance needs to:

- Include examples of less car-centric and more sustainable residential developments.
- Promote design competitions to improve quality and make urban living a preferred choice.
- Address the Existing Building Stock – Passivhaus for new build is excellent going forward but standards need to be introduced for retrofit of existing housing linked to the plans for reducing carbon take.
- Sustainability Statements to accompany all Full Planning Applications setting out how proposals deliver environmental, social and economic sustainability targets and address the impacts of global warming.

Exemplars needed – of less car-centric and more sustainable residential developments. Can competitions be held, and built, to raise expectations and make urban living a preferred choice?

Existing Building Stock – PassiveHaus for new build is excellent going forward but the Plan is silent on the bigger prize which is retrofitting and upgrading the existing building stock.

Sustainability Statements – these will be an essential document to accompany all Full Planning Applications.

Draft Bridging Island Plan Policies

The following is a response to relevant policies of the Bridging Island Plan by the Jersey Architecture Commission. Each policy has a commentary, some suggested word changes and any of the Commission's proposals follow in a boxed format. It is understood that many of the proposals are procedural, but are it is hoped helpful suggestions as to how the issues that arise on a regular basis in reviews can be dealt with in relation to the policies of the Bridging Island Plan. To assist these proposals will also be included in the forthcoming Commission's Annual Report to the Minister of the Environment.

A comment on the graphics: Figure SP1 Settlement hierarchy may be confusing. The green may imply open space and using black for town looks unattractive. There are other options, 4 shades of grey may work, or purple is often used in other plans.

Volume Two: Strategic policy framework

SP1 Responding to climate change 36

Landscape and Engineering – these inputs to Schemes are too often lacking in the schemes the JAC see. These seem to have had no consideration of such. Designers and clients must be made aware that integration of such inputs is essential to deliver carbon neutrality especially in the short timescale in Jersey of compliance by 2030. In asking design teams to offer an explanation of these at an early stage in any JAC review this can assist all parties to understand and gain confidence in the chosen design approach.

Proposal The JAC terms of reference are updated to ask that require both landscape and climate engineering considerations for all submissions with relevant expertise on the design teams.

Proposal The current practice note on design statements is updated to articulate this requirement to enable decision makers including officers and committee members to appreciate the proposals in the light of the carbon neutral agenda.

SP3 Placemaking 41

Protecting and enhancing the distinctive character and identity of Jersey is of fundamental concern to the JAC. This Policy is supported, and suggested additions to the numbered list are:

1. "it is responsive to its context to ensure the maintenance and enhancement of identity, character and the sense of place by day and evening";
- 3 "it enhances and optimises the provision of green infrastructure (e.g.parks, greens, avenues and play areas) by integrating existing and incorporating new natural features into a multifunctional green network that supports the quality of place and enhances biodiversity."
5. "it makes provision for all modes of transport in a way that prioritises and supports active travel choices, and where such provision is well-integrated into the development and minimizes the impact of car parking;

SP4 Protecting and promoting island identity 43

The adoption of Conservation Area principles and associated management is thought essential. The appeal of Jersey to visitors includes the ambience of the streets and places in the island's urban areas. The Listing of individual buildings is not sufficient to preserve this - Conservation Area protection secures the big picture. A street's character is easily eroded by gradual piecemeal alterations and renewals resulting in the loss of that special ambience and permanent detriment to the remaining buildings, streetscape and landscape. This also links to HE3 page 132-5.

Urban design analysis shows that change of grain is most damaging. As clearly evident historic growth was in streets of terraces with facades reflecting a fine grain of ownership, now larger sites and bigger buildings prevail resulting in a coarser grain which demands cleverer designs.

SP7 Planning for Community Needs 49

Clarification of terms - the Commission are concerned that the term 'sustainable location' needs further clarification This could be overcome by using a simple bullet point as a second caveat:-

- Residential development must provide safe and convenient access by foot and bike to an open space, shops, schools, surgery, and public transport links.

Volume Two: Places

PL1 -Development in Town 65

The St Helier Urban Character Appraisal⁷ (2015 updated 2021) - is a positive and well-presented document. This is not used often enough by designers to set the parameters for their development. The Commission will request future submissions respond to this document and the St Helier Design Guide when presenting their proposals. As noted above, the need to update both the Jersey Design Guide and the St Helier Design Guide is urgent to ensure characterful, contextually sensitive development in the Island.

The requirement for green infrastructure in new developments is positively welcomed.

However, the reasoned justification should reference existing and future provision and it is suggested that PL1's first paragraph is amended to read

Town will provide land and development opportunities to meet much of the island's development needs over the plan period in its role as the island's primary centre for economic activity, the provision of the provision of public services and infrastructure; the creation of new homes and green infrastructure."

PL2 - Les Quennevais 66

Secondary centre - As airports are growth nodes there is a logic in reviewing the role of Les Quennevais, the development in such key hubs follows an accepted pattern. It is noted the full appraisal of how this strategic approach may be progressed lies in the post 2025 revised Island Plan.

Proposal:

Involvement and engagement of the community will be key to set the future vision and aspiration for the centre. This could be the subject of a community enquiry looking at competing strategies.

Volume Three: Managing Development: General Development

GD 1 - Managing the health and wellbeing impact of new development 81

Hard and soft landscape design - this is too often absent, leading to barren new build with token trees. The stated aspiration for sustainability and community wellbeing should raise awareness of the development value, psychological benefits, bio diversity value and carbon reduction benefits of good quality, well managed landscapes. The submission of good quality landscape schemes, with adequate planting space and soil volumes, in 'mother earth' rather than planters, and future management strategies to ensure establishment and long-term stewardship are key to achieving the desired outcome. Creating space for communities to engage with planting, composting and future care taking engages people in their place. The community benefit of thoughtfully designed schemes can make useful civic contributions at no expense; but require a more open and generous mind set.

Amenity Spaces – the true value of amenity space was much appreciated during lock down. Private and communal spaces need more thought for personalising privacy, growing and play space - the scale, orientation and careful long-term management of these elements are crucial to provide multi-functional spaces that also provide climate change resilience.

⁷ [R St Helier Urban Character Appaisal Review 2021 WMUD.pdf \(gov.je\)](#)

Thinking about useful private space recessed rather than clip on balconies provide shading and are more useful and valuable.

Proposal

Space standards and management systems to be part of planning approvals. In this all balconies should to incorporate provision for plants and be included in the emerging SPG on design quality/ placemaking.

Proposal

The 2021 Design Awards could include a community benefit Award or form part of the criteria for other Awards.

GD 2 - Community participation in large-scale development proposals 82

Community participation - often a scheme might be shown to the public just before planning submission. By then it is a fait accompli. For true engagement, the process should be iterative in a constant feedback loop whereby the public and stakeholders should be shown options and invited to comment and be able to see what impact their input has made. The Commission supports this policy.

GD 5 - Demolition and replacement of buildings 87

Demolition – there often seems to be a presumption for demolition. This is often cited as essential for progress and increased density. The changing agenda of the Plan suggests a change in mindset is needed to allow sustainable re-use of all or part of existing development. This could be strongly incentivised by embodied carbon analysis. This approach discloses the carbon footprint of construction and ensures that any replacement building of the right scale and design has endeavoured to mitigate ‘capital’ carbon take through careful specifications. This will need to be captured in the emerging supplementary planning guidance implementing the practicalities of the Managing emissions chapter.

GD 6 - Design quality 89

Environmental quality - the Commission is the Minister of Environment’s Architecture Commission but of course its concerns go deeper than just appearance. Understanding what design quality actually means warrants further explanation.

The Commission has six tests when we review schemes - the six Cs – which guide our consideration of projects. These are –

- Context
- Connectivity
- Community
- Climate
- Character
- Change

They go beyond the aesthetics of buildings to try and encapsulate all that makes successful places. The aim is the creation of successful places and to ensure new development, specifically housing, can respond to climate change by reducing emissions.

Context appreciation – this is often lacking in descriptions and drawings. The St Helier Urban Character Appraisal is an excellent document, cross referenced in the DBIP and used by case officers in pre-apps.

Proposal:

- a) Designers of schemes within the SHUCA's 10 Character Areas should be asked to explain how the Appraisal influenced their designs. This is a key development area as set out in the South West St Helier Planning Framework.
- b) Scheme drawings should stretch beyond the client's red line on plans, elevations and sections to illustrate the existing and proposed buildings in broad context. The JAC terms of reference and invitations should request such inputs.

What's the Story? – too often there is little more than pragmatic justification for a design. Thoughtful designers want to explain and promote their work with a compelling design narrative that explains the ideas, challenges and emerging character and how it answers more than the quantitative brief.

Proposal

Case officers should insist on such narratives in their pre-application requests for major schemes or those in sensitive settings. These then need to be at the core of a project's Design and Access Statement. This could assist decision makers in shaping their reports and defend recommendations and decisions.

Competitions – holding design competitions (there are many forms) is the conventional way to raise expectations and engage citizens who might otherwise not appreciate there is always a wide spectrum of possible outcomes.

Proposal

Encourage providers and developers to hold competitions working within planning guidelines. Analyse the outcomes of the Waterfront and South Hill competitions to discover the lessons learned.

Reference: "Building in Context" English Heritage and CABE 2001

GD8 - Green backdrop zone 95 and GD 9 - Skyline, views and vistas 98

Visual Impact – the scale and grain of schemes can often jar and the outcome may not be readily appreciated because of inadequate scene setting. The St Helier 3D model is an excellent tool to show objectively the massing, scale and grain of proposed developments.

Proposal

All new schemes that exceed the height of their surroundings should be modelled in block form for the first pre-app discussions and subsequent meetings.

GD 7 - Tall buildings 93 GD 8

The St Helier Urban Character Appraisal (2021) set a level of 8 storeys for Character Area 6, which is the Waterfront. Modern storeys are 3-3.5m so higher than the 2.7m of historic buildings, adding to a mismatch of scale, which can be compounded by 5m ground floors for retail mezzanines.

When engaging in reviews for the Waterfront the attitude was to vary heights + or – the datum 'to achieve variety'. A counter view is the appeal of Hausmann's Paris of consistent roof lines, where architects' talents were focussed on subtle changes rather than dramatic steps. The artificial introduction in fragmentation without a clear architectural strategy compared to over scaled buildings can be equally damaging in delivering a new place and townscape.

Who wants very tall buildings and why? Construction and maintenance costs and embodied carbon increase exponentially with height and capital lockup adds to value engineering pressures on quality. Once built, taller buildings are often uneconomic to redevelop because the usual viability equation requires 2-3 times increase in the floor area. Resources would be better spent on sophisticated medium rise rather than tall vanity schemes. It is suggested that one only need look at the 'City of London's 'zoo' of towers', despite supposed controls! (Simon Jenkins quote). There is also the *lack of sensitivity to known environmental impacts on surrounding* buildings and the pedestrian environment, these negative impacts include over shadowing and wind tunnels. A key limitation of tall

buildings is the poor daylight and sunlight they deliver to lower storeys, and the public street and amenity areas. In mitigation, taller buildings have to be placed farther apart and consequently with a smaller building footprint. This loses the Island's local character of narrow and intimate wind-sheltered streets, as well as much of the added floor area benefit claimed for going tall.

Classic Density and Massing from *“Essential Urban Design”* by Cowan 2021 p.195

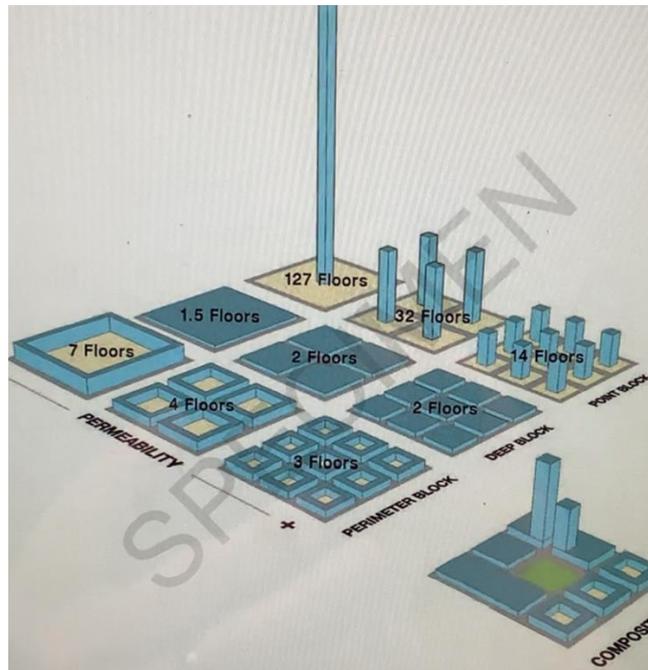


diagram Robert

Reference: *“The Housing Design Handbook a Guide to Good*

2nd Edition” by Levitt & McCafferty (2019) ISBN 978-1-138-56892

Pages 118-119 for worked examples of density, massing and management implications.

Practice

The 2011 Island Plan guidance was no more than 2 storeys above the context, 5 storeys ‘ceiling’ on new and a max of 18m if justified. The DBIP raises the 5 to 8 storeys; this has been challenged (see P. 21 of Post Consultation Report⁸) however the Minister is minded to support 8, because 5 is ‘unduly restrictive’. The Commission’s view is it is a compliance issue and if breaches were permitted on good grounds and high quality was achieved then the system has been working. We would advocate retention of 5 storeys since the existing policy would not appear to have been unduly restrictive of development and the exceptional quality expected of anything high can be more readily demanded.

Proposal:
 If Tall Buildings are to be entertained a ‘Tall Buildings Strategies and Impact Appraisals’ study should be prepared based on a local vision for an area rather than as a reaction to speculative development. Techniques such as characterisation and height studies provide evidence to support a local height definition for taller structures and identification of appropriate locations for singular buildings or clusters. This would explain the many urban design issues and, the development economics issues of viability, off site costs, future management, re-purposing and deconstruction.
 A high-quality scheme would need to demonstrate a positive relationship with the topography; character of its setting and heritage neighbours; illustrate its height and scale in the immediate, intermediate and town-wide context; urban grain and streetscape; open spaces; important views, prospects and panoramas and impact on the skyline by day and night. Careful assessment of any cumulative impacts in relation to other existing or planned tall buildings will be needed to fully understand the merits of any proposal.
 High quality tall buildings can enhance the image of a district. Any application would need to demonstrate a positive relationship with the topography; character of its setting and

⁸ [Draft Bridging Island Plan: Post-consultation report \(gov.je\)](https://www.gov.je/draft-bridging-island-plan-post-consultation-report)

heritage neighbours; illustrate its height and scale in the immediate, intermediate and town-wide context; urban grain and streetscape; open spaces; important views, prospects and panoramas and impact on the skyline by day and night. Careful assessment of any cumulative impacts in relation to other existing or planned tall buildings would be needed to fully understand the merits of any proposal.

Key References: Historic England Advice Note 4 on Tall Buildings 2015

Reference: *"The Design Companion for Planning and Place Making"* by Urban Design London 2017 Chapter 15 Tall buildings P.147-160

GD10 - Percent for art 99

The Commission supports this policy. However, we suggest expanding the policy to A Public Art and Cultural Events Strategy which is part of cultural wellbeing and distinctly different from sport and recreation. It must foster engagement with local people and visitors in cultural activities and encourage discovery of place and prompt re-consideration of the participants' relationship to the place, community, and to other people.

The outcomes might be cultural investments such as community focussed Events, Temporary Installations and use of other media. The Public Art and Culture Statement should explain the relevance of any proposal to the project cross funding it and the intended civic benefits. The intention would be to encourage other ways to reinforcing the Island's identity with cultural landmark events that add vitality and create memorable occasions which can be permanently recorded and contribute to civic pride and memory, and to engage the community in the process.

"Public art is not an art form. It is a principle whereby the involvement and activities of artists contribute to the identity, understanding, appreciation, and enhancement of public places. This is best achieved through collaboration with artists in the conception, design development and implementation of changes to the built and managed environment." Ixia. 9"

To avoid tokenistic responses early involvement of artists in discussion and input into the art provision as part of the design outcomes of any scheme would assist in integration. Indeed, if an area approach can be used the funds accrued could help deliver successful and distinctive public realm and landscape interventions. However, the risk would be issues of attribution and ownership which would require strategies to choreograph multiple installations would need to be clarified.

Volume three: General Development: Historic Environment

HE1 - Protecting listed buildings and places, and their settings 127

There is a bias emphasis in the introduction in that it refers to 'buildings and places' – but it dives immediately into details on the buildings and demolition etc. Sadly, places are hardly referenced, and no mention is made of Parks, tree protection or how landscape and buildings work together to make places.

The introduction acknowledges repair and adaptation and embodied carbon and provides balance to change based on significance. The whole building approach acknowledged. The removal of the reference to 'hard to treat' buildings is welcomed. It states that listing does not mean freezing a building in place or time.

The acknowledgment of historic shopfronts is positive.

Setting is now given due weight following legal cases and planning appeals in Jersey which has helped define this and brings the test into line with the NPPF.

HE1 states clearly that proposals should not negatively affect a listed building or place or its setting. HE1 d) 'public benefit outweighs harm'. There are issues with the proposition that

⁹ <http://www.publicartonline.org.uk/pasw/>

demolition when ‘public benefit outweighs harm’ is included on the face of the policy. If this approach is to be successful further guidance on the decision making process in these cases and a clarity of who decides will be needed. To ensure this is transparent viability tests need to be public documents within the application.

The Society of Planning Officers report on the performance of the Planning Department (2019)¹⁰ recommends that viability assessments should be public documents, as in England, and we endorse this. As the demolition of listed and historic buildings is often premised on matters of viability, it is essential that assessments are made publicly available to enable adequate scrutiny.

HE2 - Protection of historic windows and doors 131

Historic windows and doors are integral parts of historic buildings and are authentic, hand-made objects.

Double-glazing - of single-glazed historic windows is possible: in the form of secondary glazing, not sealed units which is not made clear in Policy HE2 or the preamble. This distinction should be made.

Energy efficiency - where proposals affect historic windows and doors the policy confirms these will be supported where “it can be demonstrated that they do not harm the special interest of a listed building or the character of a building in a conservation area” The Commission ask that a further criteria is added:

- *and where it can be demonstrated that all other appropriate energy efficiency measures have been undertaken.*

The provision of sealed double-glazed units is one of the most costly interventions and therefore has the longest pay-back both financially and in terms of carbon/CO² equivalent.

HE3 - Protection or improvement of conservation areas 135

Conservation areas - the JAC supports area based protection and place-making and notes that the introduction of conservation areas will strengthen this approach.

The provision of law changes under Amendment #8 allow for the designation of conservation areas (CA). There is also new enactment orders required. The Commission strongly support a timely designation of CA’s. For St Helier this is now urgent, with increasing development pressures in town, in part predicated on the Plan’s strategic spatial strategy. Given the increased development pressure in St Helier the Commission believes that establishing CAs here first would assist applicants, the planning policy and regulation services and the JAC when considering good design within the Town.

As CAs have been in place in England since 1967 and have proved a successful mechanism for guiding development, the JAC believes the BIP should place more emphasis on introducing CAs at greater speed.

HE4 - Demolition in conservation areas 136

Challenge support for demolition - the general wording is about ‘supporting’ demolition in certain circumstances. The Commission suggest this should be changed to support retention rather than demolition. Proposed amended wording, underlined, is :

The demolition of a building or structure in a conservation area will not be supported unless:

- It is not of intrinsic architectural, historic or townscape importance*
- It is not feasible to repair and or re-use the existing structure*
- Its replacement would improve the character or appearance of the area*

¹⁰ [Planning Officers Society \(POS\) development control health check final report \(gov.je\)](#)

Proposals for the demolition of buildings and structures in a conservation area must be supported by sufficient information and detail to enable the impact of proposals to be considered, understood and evaluated.

Permission for the demolition of a building or structure in a conservation area will be conditional on it remaining in place and maintained in weathertight condition until detailed planning permission for the redevelopment of the site has been obtained and a building contract for its redevelopment is in place.

Volume three: General Development: Housing

Policy H1 – Housing Quality and Design

Housing quality and design - the Commission agree with the sentiments expressed in the summary of Policy H1. They believe it should go further. to cover the following:

Context - all new housing should take account of its surroundings and existing local development forms – this does not mean pastiche but respectful architecture. Larger housing developments should be part of placemaking creating harmonious neighbourhoods and retaining buildings/landmarks of character

Landscape has to be an integrated design process rather than an add on. Each proposal should include a landscape statement which would pull together existing policies, proposals in Policy GD6 and the proposed SPG.

Proposal:

Each application for housing should have a landscape proposal which sets out how the scheme at a minimum retains and preferable exceeds existing bio-diversity levels and how the scheme ensures that safety and accessibility needs of pedestrians are paramount. There should be a long-term management/maintenance plan to ensure the new landscapes are sustainable – for example, fewer semi mature trees which may be better than more young trees which are less likely to last; and robust hard landscape areas with a limited pallet of materials that relate to the character of the place and take into account other environmental factors.

Parking standards - whether and how much parking for cars is provided needs to take account of local public transport, accessibility of local services, schools, doctors surgeries, shops etc. Where car parking is provided – even on one-of houses – electric car charging points should be mandatory. We are aware that an SPG on parking standards is proposed but think in the context of the desire to create great places and reduce emissions both themes of this plan, it would be sensible for there to be an explicit policy around car parking and car use.

Proposal:

Where housing schemes are in urban areas provision of cycle storage space at ground floor level should be mandatory along with charging for electric bikes – Policy TT2 (page 238) covers this and should be part of the Housing Design Guide

Policy H2 – Housing Density

Density - the Commission welcomes the approach to densification of housing and the approach set out in Policy H2 but has the following cautions:

The new housing has to take good account of the existing character of the area where it is being developed – recent developments in central St Helier offer an object lesson in how not to do higher density housing. The schemes include:

- Loss of local character with the demolition of buildings which elsewhere would have been part of a conservation area.
- New homes which are mainly one and two bedroom flats which are accessed of long internal corridors which are narrow and deep in plan with windows only on one side and kitchens at the extreme end away from natural light.
- With bathrooms opening onto kitchen dining, living areas.
- Likely to be dark particularly on lower floors and where they are north facing
- Are likely to overheat particularly where they are predominantly south and west facing as they have no natural cross ventilation

Proposal:

Given the pressures for new dense housing the Plan should reference the following with further development of the themes within the Housing Design Guide. Attention needs to be paid to the arrangement of homes of different sizes in higher density housing:

- Larger family units on the ground floor with access to a small garden, perhaps as a maisonette
- 'Usable' balcony size (eg London Housing Design guidance defines 1500 minimum depth) for homes higher up with sunlight
- Concern over child/adult densities to ensure that there is informal policing in denser developments
- Limiting access on each floor to no more than 6-8 homes

Where there is communal open space consideration should be given to sunlight/daylight particularly where it is in a courtyard and noise issues where courtyards might be used late into the evening. Consideration should also be given to the below ground conditions and how that related to and impacts the proposals.

Standards should lead to more deck access and/or short internal corridors which are naturally lit and ventilated. This reduces overheating risks and service charge costs. Standards should also encourage the use of photovoltaics and air and ground source heat pumps which increase local renewable energy

Service charge and sinking fund costs need to be considered as this can impact on the affordability of homes for people on moderate incomes not just people on low incomes

Taller buildings - both build costs and running costs are likely to be higher the higher the building and taller buildings need to take consideration of climate change with higher winds and more torrential rain likely

Habitable rooms per hectare is a better measure for density than homes per hectare.

Where the housing is affordable, particularly rented, then an estimate of people housed should be a supplementary calculation to assess likely child density levels.

Higher density riposte: you might be told by developers that what the Commission would regard as unacceptable high density developments sell well and this demonstrates they are popular. To explain this, we would point to the overall shortage of new housing in Jersey evidenced by the plan which make all new housing desirable in the short term.

Developers are also likely to be resistant to PassivHaus because of potential increased costs/increased sales values. But if all new homes are built to this standard land values might adjust downwards or increases slow. Two development standards as proposed under Policy ME1 and ME2 are likely to increase construction costs on all housing given the relatively small numbers of homes Jersey expects to build annually and will make mixed private/affordable schemes very complicated. Developers are more than capable of

developing repeatable standard plans for PassivHaus which they can roll out on other developments

Good design - There is an argument that building at higher density is critical to resolving Jersey's housing shortage. While we support this it shouldn't open the flood gates to badly designed and inappropriate housing which won't be popular over time. Intelligent and thoughtful architecture should be able to balance quality and quantity and a Housing Design Guide referencing precedents (such as London's highly desirable Georgian and Victorian streets and squares at around 80 dwellings per hectare whilst providing private gardens and enclosed green space) would be a helpful tool in managing this.

"The Housing Design Handbook a Guide to Good Practice 2nd Edition " by Levitt & McCafferty 2019 ISBN 978-1-138-56892

Pages 118-121 show worked examples of massing and management implications

Policy H4 – Meeting housing needs

The Commission support mixed developments in terms of unit type (and tenure) however higher density sites very close to services might be balanced to provide more smaller units than family units and sites where family houses can be included might have fewer small units. However, we do firmly believe that urban living is attractive to many families and that there are real dangers about the success of communities and neighbourhoods which are overwhelmingly made up of one and two bedroom homes.

Right sizing – the Commission would raise the following arising issues:

Generally, people in whatever tenure will only want to move into traditional elderly person/care homes when they have a health crisis and generally when they are over 70. There are good examples of over 55 housing for sale and rent where:

- Flats are more generous with 2 bedrooms, a study or study space and more generous space standards to make them attractive and to meet good mobility of standards/lifetime homes
- They are well located for services and often provide car parking
- Legal arrangements make them only available for over 55s which reduces some lifestyle issues on mixed age developments
- They don't generally have communal rooms/support services – individual residents buy in care as required - we think this is the approach being suggested by the Jersey Care Model

PassivHaus standards for all new housing should make the reduced running costs, and assured indoor air quality, attractive to right-sizers

Proposal:

To encourage people to downsize from social/affordable rented family homes consideration should be given to:

- Pre-allocating new housing to right-sizers early to give them some choice over décor/kitchen units etc.
- Allowing an extra bedroom so a couple right-sizing would be offered a two bedroom home
- Total rents being no more than their existing homes

Policy H5 – Provision of Affordable Homes

Sites - the Commission doesn't have comments on the specific sites but favours sites being zoned for affordable housing and for more mixed tenure zoning of private sector sites.

It may be appropriate to consider a Planning gain/Community Infrastructure Levy on larger sites with the majority of the funding to be allocated to the provision of social rented housing. There is reference under the Proposal 22 on page 194 to a Sustainable Communities Fund with payments linked to the size of the new development. We understand legislation will be required for this. We believe that:

- A fixed percentage of this fund should go to providing affordable housing
- That all new development should be captured and that on single family houses the percentage contribution should accelerate as the housing size increases in the way stamp duty increases in the UK
- That where buildings are demolished that the floor area of the new building should be included with no offset taking account of the size of the previous building.

Policy H6 – Supported Housing

The All Party Parliamentary Group on Housing and Care for Older People (HAPPI2),¹¹ has highlighted the benefits of improved housing options for older people. The outcomes of this, in synopsis, recommends

- a cross-government approach to delivery of the Plan for Implementation,
- defining the need and making adequate provision for older people within land use plans,
- recognise the links between housing and health to develop housing standards and policy,
- deliver the Plan for Implementation including HAPPI principles in design and procurement,
- recognise achievements of delivery to a defined standard in design awards,
- deliver explicit provision for the known aging population, including the use of CIL funds and use of planning obligation agreements,
- use savings in social care budgets from health gains in the right housing for older people and secure the release of under-occupied family homes and
- create a register of all accessible and specialist retirement housing to help those looking for such.

These recommendations could be incorporated into the preamble to the policy.

Policy H7 – Key Worker Accommodation

Keyworkers – given the challenges might key worker accommodation be part of a rural exceptions type approach? This ties in with the possibility of a limited amount of affordable housing being built outside of the urban area subject to the limits set out in Policy H7. Key workers on term contracts need dignified homes. In London, for example, there are providers such as the London Hostel Association who commission and run bespoke facilities. Might the Island use tax incentives to attract operators to deliver such accommodation?

Policy H8 – Housing Outside the Built-up Area

Extension scale - The approach being taken seems sensible particularly limiting the size of extensions on existing housing. The Commission has seen schemes where the ‘extension’ is significantly bigger than the existing property and it is effectively a new housing development.

11

https://www.housinglin.org.uk/_assets/Resources/Housing/Support_materials/Other_reports_and_guidance/Housing_our_Ageing_Population_Plan_for_Implementation.pdf

Converting and or demolishing existing non-housing buildings for housing use makes sense subject to the tests set out in the Plan particularly if PassivHaus standards are required and the proposed development is supported by a sustainability statement setting out tangible environmental gains.

Volume Three: General Development: Managing emissions

ME1 - 20% reduction in target energy rate for large-scale developments 208

Is 20% enough? The proposed 20% reduction is out of step with the rapidly evolving context. France is reducing its nuclear generation proportion to 50%, their electricity costs are expected to rise significantly for new generating capacity investment, and constrained peak demands are expected due to the increasing renewable energy proportion. Meanwhile there are limited alternative zero carbon Island supply options.

Other countries and regional authorities are already setting themselves on more rapid demand reduction trajectories. In the coming year England is expecting a reduction of 30%, with the GLA's 35% reduction introduced in 2015 expected to be applied on top of this. Meanwhile, addressing the major gap between overly optimistic design predictions and actual energy use, authorities like the GLA are mandating disclosure of actual energy use post construction.

The LETI Guidance being adopted by many planning authorities responding to Climate Emergency Declarations across the UK, proposes even tighter standards.

ME2 - Passivhaus standards for affordable homes and major development outside the built-up area 211

Standards - Consideration should be given to requiring PassivHaus, AECB or LETI retrofit standards appropriate to decarbonisation where significant refurbishment and extension of a property is proposed

Housing - the proposal that new affordable housing should meet PassivHaus standards is welcomed and should improve design quality with examples of Passivhaus flatted housing available. However PassivHaus standards should be applied to all new development to make construction simpler by not having two standards for new build and improve the long term quality of all new homes and critically reduce carbon take. The design impacts would also remove the tenure blind approach to mixed developments.

While the PassivHaus standard will undoubtedly reduce fuel bills for people on low incomes not applying it to private sector homes could add to emissions as better off people can afford to introduce air conditioning where homes overheat.

The cost of adding air conditioning to homes that overheat both in terms of capital and increased running costs is likely over time to be more expensive than building to PassivHaus standards at the outset

The growing consensus on the scale of response needed points to all new development types meeting Passivehaus standards or equivalent. Passivhaus as a standard is applicable to almost all other building types. Applying this only to affordable homes would be to further the use of heating and cooling for open market housing or new large homes where such extravagance can be afforded. Applying these standards across the board would also ensure the tenure blind approach to mixed developments

Proposal:

The introduction of Passivhaus will require a programme of help and education for all parts of the development community and support to Jersey officers involved in new development. The Commission believe that such a programme is a very sensible long-term investment in the well-being of Jersey and will go some way to delivering Jersey's targets on climate change and carbon reduction and stand ready to assist.

Retrofit – as set out above the Commission urge a common standard to be adopted for carbon neutral interventions for new development which would require a rethink of Policy ME1 and ME2. These policies need to be considered for the majority of the traditionally constructed buildings in Jersey. This is not just protected heritage structures, but many homes and retail buildings in the Island. In 2015 report on domestic energy in Jersey¹² 27% of residential buildings were assumed to be 'pre 1930s' properties and 9% 1940 - 1950 with likely solid wall construction (page 15), but this is acknowledged to be based on uncorroborated data. Urban retail and some commercial buildings would also fit this category.

The question is how best to bring forwards standards for this cohort of buildings. Adoption of the appropriate standard will need to respond to the specific issues arising from traditionally constructed, vapour open, solid masonry wall structures (whether listed or not) as they perform differently to modern structures. As such the 'whole house' approach, as mentioned in the Historic Environment chapter, may be a more generally applicable approach and deliver Enerphit/AECB/LETI standards. Jersey could develop a stock model and relevant guidance for Net Zero retrofit including a stepped approach.

The suggested amendment with relevant references in the preamble are suggested and that Policy ME2 references retrofitting an existing building, except where it is a traditionally constructed home and/or a listed building where other appropriate standards are applied.

ME3 - BREEAM rating for new larger scale non-residential buildings 213

BREEAM – this is considered as a poor way of managing emissions. Only 15% of BREEAM credits refer to energy, carbon. Complying with these can be entirely avoided as 'Very Good' only needs 55% of the basket of available credits! Instead, Energy Use Intensity defined targets could be used, for example UKGBC commercial buildings recommendations which also align to 'NABERS' and 'Better Buildings Partnership' ratings. Passivhaus also uses these. Similarly the 'NABERS-UK' ratings are appropriate standards.

Building Byelaws should also be changed to drive up standards. Planning tends to focus on the larger projects and allows some implementation flexibility during this process of adopting new standards. The Building Byelaws then follows up applying the new standards more rigidly for all applicable sizes and types of buildings.

Volume Three: General Development: Travel and transport

TT1 - Integrated safe and inclusive travel 253

Delivering sustainable transport – at present the Commission see too many new developments reinforcing, propagating, and locking in, the current unsustainable transport situation. The Plan needs to make clear what the policy direction of a 'fundamental re-think of how road (and associated) space' means for development. It should be unequivocal in stating there will be fewer cars (and vans) on the road. Major developments should be expected to take the lead now to reduce their dependence on private cars, making it clear that this does not mean less mobility, but instead harnessing changes such as Mobility-as-a-Service (MaaS) and modal shifts. This has a direct impact by freeing up land used for parking and changing the facilities provided on site.

*Jersey Architecture Commission
26th November 2021*

¹² [Developing an approach to Domestic Energy Efficiency Retrofit in Jersey \(gov.je\)](#)

