

I refer to the application P/2010/1717 for development of Field 622, St Ouen and wish this document to be considered by Mr Bushby in advance of the public inquiry set for 2 July 2013.

This document concentrates primarily on the demand for the homes for the elderly and linked to that the funding available for the construction and how that funding has been related to the demand. I set out below a number of factors:

Requirement for Sheltered Housing

As a precursor to the statements made in this section, the Island Plan 2011 in policy NE 2.85 states that buildings in the Green Zone can only be justified where there is strong justification related to essential development requirement for a countryside location and where alternative provision cannot be made or found within the built up area.

In 2007 the Parish of St. Ouen was approached by the Planning and Environment Department in relation to the proposition lodged au Greffe on 14 May 2007 entitled 'Rezoning of Land for Category A and Lifelong Dwellings for the over 55's'. At this juncture the Parish declined to be involved citing a lack of need. Following the announcement of Mrs Beryl Coulter's legacy, the Constable declared there was a need for 36 units of accommodation to satisfy the current waiting list. (*Minute 6th Feb 2009*) It is evident that the legacy has generated a sudden and expansive increase in demand by the Parish.

Table 1 illustrates the various figures that have been sighted in support of the Parish's application to use a green field for development.

The report submitted at the Parish Assembly dated 17th November 2009, cited the need for further sheltered housing as 15 doubles and 28 singles, i.e 43 units. The Constable in answer to a question advised that 90% of these 'applicants were over 60 years of age'.

It is astonishing therefore, that from 2007, when the Parish declined assistance to the date of the submission by Mr Thorne in 2013, the waiting list would appear to have doubled to 60 or 72 (whichever figure is correct!). The accuracy of the figures being sighted by the applicants are erratic. This calls into question the precise demand and, therefore, the required size of the development. Should an important protected green field be sacrificed on such evidence?

Table 1

Date	Item	Submission by	Total applicants on waiting list
6 Feb 2009	Parish Minutes 6 th Feb 2009	Constable	36
23 Feb 2009	Email 23 rd Feb 2009	Rev John Harkin	35
11 Nov 2009	St. Ouen Parish Report	Parish Report	58
5 March 2013	Initial Submission dated 16 th April 2013	P. Thorne	60
5 March 2013	Appendix 1 Thorne Initial Submission	P. Thorne	72

I would respectfully request that the requirement for demand should be independently tested and verified by utilising a professional market research company. Questions can be put to a statistically correct random sample of parishioners from which meaningful conclusions as to demand can be drawn.

Legacy Money

In October 2007 the Parish was bequeathed an unknown sum of money by the late Mrs Beryl Coulter, being the residue of her personal and moveable estate. Mrs Coulter's executors were instructed to create the Coulter Trust to hold and invest the residue of her personal and moveable estate. They were further instructed to accumulate the income of the Coulter Trust and to distribute the assets with any accumulated income therefrom to such incorporated body as may be set up by the Parish of St. Ouen for the purpose of the provision of homes for 'the elderly of the Parish'.

On the 3rd October 2008, an incorporated association called the Parish of St. Ouen Sheltered Housing Association, was incorporated for the express purpose of constructing homes for the elderly of the Parish of St. Ouen and for accepting the bequest of the Will Trust.

The first instant when any sum of money was made public was at a Parish Assembly held on the 5th March 2008, when according to correspondence between the then Constable, Mr K. Vibert and Mr & Mrs Le Brocq, the Constable advised that a former resident of the Parish had left a sum in excess of £2 million to the Parish for the construction of sheltered housing for the elderly of the Parish.

At the initial meeting held with residents of the area surrounding Field 622 on 6th February 2009, when asked how the figure of 20 homes on the plan had been reached, according to the minutes of this meeting, Mr D. Ellam, Procureur, stated, that this was 'because the architect said we could get 20 homes for the money available'. Note the number of homes had not been determined by a requirement of need but what the money might allow.

It became evident at a later date that a significant part of the legacy was in fact held in a property portfolio including property in the UK.

Unfortunately, in 2008 and 2009 the UK property market generally suffered a loss of between 15-25%. Any sums, therefore, within the Coulter Trust represented by this form of investment can be expected to have diminished accordingly. It is interesting to note that the Parish plans for the number of properties to be developed did not decrease and one must inquire how the Parish would, therefore, fund any shortfall.

The current application for 19 units only shows a reduction of 5% on the initial plans and as the property market in the UK has not as yet recovered to the previous levels of 2007, again this begs the question how would any shortfall be funded.

The Parishioners of St. Ouen have not been given any costing to consider or ratify either by Parish Assembly or other forum and it is understood that the expenditure by the Parish on plans, applications etc has now exceeded £90,000. This figure has not been made public to Parishioners.

It is reported that when asked what would happen if there were insufficient funds Mr K. Vibert, former Constable, advised that the Parish would build fewer units. Additional units would then be added as and when required or affordable. Surely this seems insufficient grounds on which to make a planning application.

Conclusion

In conclusion, it could be deduced that the demand for the homes for the elderly was generated by the Parish of St Ouen as a result of the generous bequest due to the fact that only 6 months earlier no demand was identified by the Parish for the Island wide survey. Since then demand figures have been erratic and the method by which demand has been assessed is not verifiable.

The Parish of St. Ouen authorities have never published any information regarding the true or accurate amount of the legacy, whether the assets have been realised (i.e UK property sold) nor the extent of the expenditure to date by the Parish on this project. One might surmise that the application is in part driven by a need to justify the amounts to be spent and one would hope that the Inspector might look into this in more detail.

Whilst the Proponents of the scheme may argue that the Parish have a clear mandate to advance the proposal (which could be contested due to the short comings of the vote count at the Parish Assembly on 17 November 2009), it could be argued that Parishioners have not been provided with an adequate feasibility study which should have included a detailed budget and costing linked to the verifiable demand.

In the absence of a clear verifiable audit trail over demand for the homes and the lack of transparency with Parishioners with regard to costing linked to demand, the Proposal cannot comply with NE2.85 of the Island Plan 2011.

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