

# **2011 Island Plan: Interim Review (1)**

H1 – Reply to Minister’s Response

**Field 1219, La Grande Route de Mont a L’Abbe, St Helier**

November 2013



The owner seeks the Inspectors' recommendation to rezone Field 1219 for Category A Housing.

There remains serious doubt whether the Minister's proposal to re-zone sites will adequately deal with Jersey's affordable housing need because the Interim Island Plan underestimates the potential demand.

The Inspectors' report May 2011 stated:

*'There is a housing crisis in Jersey'; 'There is a serious danger that States Members risk failing in their collective responsibility to deal with this crisis' and 'deferring the problem will do nothing to solve it and indeed will only make it worse'.*

Field 1219 would help satisfy this need.

The Minister's response (Vol 2) is we believe incorrect in stating that sufficient land is available for the provision of affordable housing, for the reasons stated in the last submission, and for the reasons that will no doubt be discussed during the first day of the EiP.

It is no more than political expediency to continue to state (as was the case in the last EiP and the previous IP Review and proven to be incorrect) that there is sufficient land available. The Minister and the States of Jersey in general, has been shown to consistently fail to provide sufficient housing.

It is noteworthy that the Minister relies on the Inspector's lack of support for individual sites when defending not re-zoning the many other sites put forward. However, in the case of Field 1219 the Inspector does support housing on this site. Faced with professional advice contrary to his own political positioning, the Minister simply continues to ignore the independent and professional recommendation and instead claim sufficient land is available, a claim known to be wrong.

The appropriateness of Field 1219 for housing is demonstrated by the Minister's own assessment, scoring 'high' for 'Suitability' and 'Spatial Strategy'. The final criterion (Use Rating) is deemed to be 'low' because it is agricultural land. To repeat the previous submission, the Minister has already considered the use of the agricultural use of site and concluded in 2010 *"the principal physical constraint for this site is the taking of good agricultural land, however this needs to be weighed up against the public benefits of school playing fields, Category A Housing and a public footpath."* The fact that it was proposed to be re-zoned illustrates the Minister's view that the public benefits brought about did outweigh the loss of agricultural land, the loss of open land and any perceived harm to the landscape. This view was shared by the Inspectors.

The Minister's current site assessment is too crude a tool in this instance as it concentrates solely on the existing agricultural use and does not weigh the public benefit of the land given to the school.

Indeed, since 2010 the only material factor to have changed is the worsening housing crisis and the continuing failure of the States of Jersey to address the housing need.

Attached are plans showing how the site can be successfully developed.