

The principal strategic spatial policy is to direct development into the town of St Helier and, judging by the implementation of the Island Plan 2011, to date, this has been at all costs.....and which has failed.

Whilst very few high density permissions have been granted, they are not being implemented. One therefore questions whether these permissions are simply used as financial leverage for the existing commercial uses.

Where other opportunities have arisen, the owners have either had to walk away and are instead reinvesting off-island, or there have been years of delay caused by Planning changing the goalposts at various stages of the application process, normally at the pre-application stage, resulting in a loss of confidence in the system by the major stakeholders.

Therefore, to provide the windfall sites needed, more opportunities need to be created to provide Category B Housing developments. The need for this is emphasised by the fact that the amount of Built Up Area was actually been reduced by 157.8 acres in the last Island Plan 2011 (equivalent to 2,200 dwellings at 14 dwellings per acre). This is not an insignificant amount of land in an island the size of Jersey, especially having regard to the fact that many, if not most, opportunities to develop sites within the existing Built Up Area have already been exhausted during the last Plan period.

Moreover, the rigid implementation of other proposed policies in the Island Plan (2011) have resulted in the amount of land being made available for residential purposes being further diminished, both in the island as a whole and particularly in town, where most new housing is expected to be delivered. This is demonstrated by the following issues:

- Policy E1 presumes against the loss of employment land. During the previous Island Plan (2002) period many commercial sites in the countryside were allowed to be redeveloped as an exception to policies C5(c) and C6(c) to provide housing. This opportunity to provide additional housing has been lost as, again, this new policy has been applied very rigidly.
- Policy E1 also, therefore, presumes against loss of employment land in town, except offices. However, the offices are not being redeveloped as expected because the delivery of the major office development on the Waterfront Office District has not materialized.
- Rigid implementation of Green Zone Policy NE7. ie refusal of dwelling on land at Panorama, an infill site with existing development on all four sides, but refused solely on Green Zone grounds.
- Restrictive development control requirements (minimum size of units, minimum car parking standards and outdoor amenity space requirements, height of buildings) prevent sufficient yields to encourage conversion or redevelopment of existing premises. Additionally site constraints, such as poor access, increasing numbers of Registered Buildings, Conservation Areas and archaeological sites further restricts potential development opportunities and/or add to the cost of development, making town sites too unattractive for residential development. For instance, this caused Le Masurier to withdraw from the £75 million redevelopment of Bath Street and causing delay in respect of the redevelopment of the Ann Street brewery site.

Other factors include:

- Not all Islanders have aspirations of living in flats in town, especially those originating from the country parishes, hence why the Parishes want the affordable housing sites to be developed for their own parishioners, specifically for 1st time buyer and over 55s housing.
- This distorted weighting in favour of flats is not likely to encourage young families, who aspire to live in houses with gardens, to stay in Jersey and this outward migration of young families

will therefore be counterproductive to the Island's strategic policies in relation to an Ageing Population, and therefore harmful to the economy as a whole.

- Fragmented ownership of land (especially in town) causes difficulty in assembling small sites to enable comprehensive developments, owing to the varying expectations of the owners. The States has also shown itself to be very reluctant in using the Compulsory Purchase Powers available to it as these are considered too draconian in our culture and, therefore, politically unacceptable.
- There will be a reaction against high density schemes or "town cramming" without reasonable levels of car parking, communal open space, public open space and other community facilities being in place. There will be a fear that high density developments will cause social exclusion and an increase in crime. The culture in Jersey for families is one of homes with gardens. It is not "culturally" suited to high density developments. Where high density developments have occurred they have, generally, not been successful.
- The Esplanade Quarter has not delivered the 600,000sqft offices. Therefore, the likelihood is that the existing secondary offices in the town will not be made available for conversion or redevelopment and a significant shortfall in housing provision will therefore occur. The owners of offices will simply sit on the land until the policy is changed. Moreover, many such secondary offices are likely to be on long leases and therefore not capable of being redeveloped in the short term. However, even if Esplanade were developed, the cost of conversion or redevelopment of these secondary offices would significantly exceed site value and owners would be better served by asking for a lower rental for their offices than convert or redevelop.
- With regard to focusing development into town, it is interesting to note that many of the sites in town zoned in the 1987 Plan did not deliver any Category A Housing and these include, Caesarean Tennis Club, Animal Shelter, Maternity Hospital, Castle Cars Site, Box Factory and Mascot Motors. Similarly none of the ten H4 sites in town, proposed in the 2002 Plan, have been developed for Category A Housing. Indeed, when the Cat A housing site at Ann Street was approved for cat B Housing, it was understood that the other town H4 sites could similarly be developed for Category B Housing, to incentivize the development of these sites for housing. Notwithstanding this significant concession, these sites have still not delivered any housing. Therefore, the expectation that the town will deliver housing on the grand scale anticipated is misconceived, and it is disappointing that the lessons of the past have not been learnt.
- Finally, and which is not to be under-estimated, it is important to touch on the entrenched culture in Jersey in relation to property, compared to the UK. A Jerseyman is both shrewd and stubborn. The combination of these characteristics, together with the fact that there are no death duties or inheritance tax in the island, is that he tends to hold onto land until a good commercial opportunity arises and which, similar to the reasons given above, has prevented residential development.

These factors therefore serve to demonstrate the difficulty there will be in procuring sites to develop housing in the town of St Helier and, therefore, that more opportunities need to be created, including the need to extend the boundary of the Built Up Area; allow the redevelopment of glasshouse sites for greater levels of development and; finally, to adopt a more flexible interpretation of the Green Zone policy to allow appropriate small scale developments in the countryside, which together will help to meet part of the demand for the 2400 windfall dwellings identified to be needed in the Interim Review.