2<sup>nd</sup> January, 2014.

Mrs H. Wilson, Programme Officer, Planning Department, South Hill, St Helier, Jersey.

Dear Mrs Wilson,

Further to your Island Plan Interim Review (1) Field 622, St Ouen, Further guidance for the Inspectors, referenced and dated 8/53/EiP, 06 December 2013, we would respond as follows.

With regard to the three further questions raised by the Inspectors and the comments made by the Planning Officers, we would use the same references for our responses below:

1. and 2.

(a) We, the Parish of St Ouen, would confirm that we have demonstrated a willingness to develop Field 622 for the creation of homes to contribute toward the Island's affordable housing needs and would further confirm that the occupation of the basis of 80/20 tenure split is acceptable. At this time, the proposal would be to rent 80% of the units and sell 20% to downsizing purchasers, therefore freeing up existing housing stock within St Ouen to meet the demands of other St Ouennais.

It is the intended objective of the Parish to seek provision for Homes for the Elderly (over 55), as defined within Category A.

(b) First Bullet Point:

On numerous occasions, the Parish has confirmed to the Planning Department that the Parish owns the land through the Rectorat. The Church is aware of the proposals for the land and the Dean signed the application form. Further clarification to our architect, via an email dated 24 December 2013, to this note, confirms that the Rector, Ian Pallent, has confirmed that they have an understanding with Field 622 and that he is in support of the building of Homes for the Elderly on this field.

Therefore, the Parish has provided clear evidence that they own the site, which in itself makes the proposal affordable, and that the other party, namely the Church, is aware of and in support of the proposal.

(b) Second Bullet Point:

The Parish has stated to the Planning Department that there is a bequest to the Parish for the development of Homes for the Elderly on this land. The Parish can confirm that they have met with the Housing Minister and it has been agreed that the fund fits the definition of Category A, allows for the 80/20 tenure split and that the Housing Gateway can be bespoke to allow for St Ouen Parishioners or people with strong interests in the Parish. This would then fit the requirements of the bequest. The Housing Minister has

recently undertaken a similar exercise for the Parish of St Saviour, establishing that the required refinements in the selection of tenants from the Housing Gateway is achievable.

(c) The Parish of St Ouen is pursuing the rezoning of Field 622 to provide for a ten year plan to meet the various requirements of housing need. Consequently, the Inspectors should be aware that via the last Public Inquiry for this site, it was noted that the Island Plan fell short in providing suitable land for the expansion of St Ouen. The current proposal for the rezoning of Fields 622 and 785 cater for St Ouen's ten year plan, which provides a strategy for St Ouen meeting its requirements for Category A affordable housing and to meet the unknown quantum of the Health Department's new strategy. Indeed, at this time, the Parish is aware that the future health strategy will require more care in the community, which will mean that St Ouen and other parishes will need to make provision for facilities such as wellbeing centres and sheltered housing with assisted care and these facilities, in all likelihood, will have to be met by building within the Built Up Area.

Therefore, whilst the Housing Gateway is providing evidence of need, St Ouen is aware that there will be a continuing long term need, which will grow over the Parish's ten year plan. This need is not only for people falling within the terms of affordable, but will also be for other people and families of St Ouen. Whilst the Parish has its own waiting list, some of the people on this waiting list do not fall within the term affordable and the Parish has a responsibility to ensure that all of its Parishioners' housing needs are suitably met. However, the Parish has existing homes which may be able to cater for this need. If they cannot, the Parish will look to its other <u>limited</u> land within the Built-Up Area to meet this requirement as the need arises.

The Parish has also had confirmation from the Housing Minister that there is an established need, both in terms of Parish and island wide need via the Housing Gateway, and that the provision of the Homes for the Elderly on Field 622 would be much welcomed in order to resolve the current housing shortage.

3. The Parish of St Ouen together with its architect, Morris Architects Limited, believes that it has provided sufficient information as to why Field 622 is the most suitable field to be rezoned.

Suggestions by the Planning Department to redevelop existing elderly accommodation within the Parish have been reviewed, however it is extremely difficult to justify due to the fact that the existing tenants, who occupy in excess of thirty-nine homes, would need to be re-homed temporarily (possibly two years) at a time when the Housing Minister has confirmed that there is an absolute shortage of housing stock with a waiting list of circa seven hundred and forty people.

From the evidence of the examination of alternative sites, Field 622 maintains its position as the most favoured due to its proximity to the village, it being an extension of the rural settlement and also being under the ownership of the Parish. Other sites that have been reviewed do not meet all these criteria and therefore do not meet the forward plan of the Parish.

4. The question over why the Parish has not undertaken a Village Plan is a subjective topic. The Inspectors should be aware that there have not been any Village Plans ratified into Supplementary Planning Guidance to date. The Planning Department should question why this is the case. The Parish of St Ouen believes that it is not an easy exercise to undertake a village plan, particularly without the assistance of the Planning Department, being the main driver, and that at the time of the Parish initially seeking the rezoning of this field, the requirement for the Village Plan did not exist.

This being said however, with the site assessments that have been undertaken and the knowledge of the two possible fields, 622 and 785, being proposed for rezoning, together with the review of other alternate sites within the Parish, which have also highlighted

that the Parish is well provided for in terms of amenity, we would argue that although this assessment has not been termed a Village Plan, it has actually undertaken the requirements of a Village Plan. Indeed, this review has been through the required open process of public engagement several times and evidence has been provided to the Inspectors of the previous application and the Parish Assemblies. This open public engagement has proven, via a democratic process, that the Parish and its Parishioners support the proposition for the rezoning of Field 622.

Therefore, the previous application and the previous Public Inquiry together with the Public Assemblies and the current process and reviews of alternate sites have meant that the consideration of the developments proposed within St Ouen have truly tested the requirements of Policy H5.

We hope that the above information clarifies the questions raised by the Inspectors and comments made by the Planning Department in relation to those questions.

If you require any further clarification, please do not hesitate to contact us.

Yours sincerely,

Michael J. Paddock, Connétable de la Paroisse de St Ouen.

Cc Mr Andrew Morris - Morris Architects Limited Deputy Andrew Green - Housing Minister.