



2011 Island Plan: Interim Review Consultation - Further Comments of the Catholic Church in Jersey

Preface

In our initial comments submitted by letter (e-mail) at the end of September we concentrated on the issue of inadequate supply of 'affordable housing' in the Island.

We explained why we had not been able to submit more comprehensive comments before your deadline date and sought your willingness to accept later comments. We appreciate your assistance in this matter.

We will not comment at this stage on other matters which are part of this review, wishing to leave that to others who are more knowledgeable on detailed environmental matters.

In referring to the consultation document we will refer to Policy, page and paragraph numbers to assist in correlating our comments with your consultation document.

Scope

We note that some 13 policies are subject of this review. We intend to make our comments in policy sequence where we believe we have something to offer; they will be related to the revisions highlighted in yellow.

Housing

Introduction (pp227)

The first sentence of the statement in para 6.1 is key to our comments. We observe that this makes no reference especially to the need of 'the home as a place for the family' or 'for family life'. We believe this is a drafting lacuna and feel it should be rectified as part of your revision.

We note the first three bullet points of the States of Jersey Strategic Plan 2012 and express our support for those.

We note also the revised wording of para 6.5. Our primary concern expressed through these comments is for those residents of the Island who for whatever reason live in "*unqualified property, such as a lodging house or staff accommodation, or to live in qualified property with a qualified person as their lodger or partner.*"

The former applies to those migrant persons who are here on short-term assignments, such as those working traditionally in agriculture or tourism, as well as those who wish to make Jersey their home. Initially this may be anticipated to be for a small number of years which will not entitle them to purchase a housing unit.

Sadly, there is a significant number of residents who end up living in Jersey beyond the now qualification period of ten years and who may never be able to aspire to owning their own property.

Our concern therefore is for all those in this situation regardless whether they are eligible for residential qualification or not. Many will have been connected to the island for several generations.

Planning for Homes & Categories of Housing

Pages 229/230/231 set out the two categories of housing. Category A is defined as ‘affordable housing’.

We note paras 6.6 through 6.9 (not revised). We consider the process of planning for homes as critical to the long-term cohesion and well-being of the community. Particular attention must be paid to the needs of those who are today seriously disadvantaged and, from many years of experience, we suggest may well continue to be unless a miracle occurs for them.

Such a process of assessing present and future demand of those in poor and substandard accommodation or forced by changing circumstances to be in overcrowded accommodation must be based on sound and comprehensive knowledge.

Demand for Homes (pp231 – 235)

We note in para 6.27 reference to the 2012 Housing Needs Survey for 2013-15 conducted by the Statistics Unit. We are not questioning their findings but can we be sure that it fully represents the groups within the community for whom we express our concerns? Is the full extent of the various situations which we have encountered, or of which we are aware, known to the Housing authority and factored into the thinking behind this section of the Review?

We are very concerned that the time lines set out based on this Plan and the Strategic Plan do not look far enough into the future, notwithstanding the reference to the Population Model looking out to 2065. We note in para 6.20 that “*The Council of Ministers recognises that further analysis of this issue is required and proposes to review immigration and population objectives for Jersey as part of the development of a Long Term Plan to be brought forward in the Spring 2014 follow (sic) a period of public engagement.*” We hope that the outcome of this further analytical and consultative process will inform this planning review as it runs in parallel.

While there was an active period following the research work of the 1990s into Housing and Poverty in the Island, and correlated with the poor health of those experiencing relative poverty, especially in the Town area, as a result of which housing supply was improved significantly by the early 2000s, we suggest that the States and therefore Planning should now look at current trends and supply needs likely to be encountered up to 2050, not just to 2020 (ref. Table 6.1).

Notwithstanding para 6.35 and 6.36 taken together, we are not convinced that the States of Jersey as a whole really appreciate that the world is changing with regard to the type of homes required in the future. Given both the economic experience of the last five years and the likely future, public expectations of what is affordable must be reduced for generations to come. This is a real social issue and a challenge for Jersey's government. Table 6.2 gives us serious concerns as the extent of the problem.

Supply of homes (pp236 – 242)

We note the detailed analysis leading up to Table 6.3 which is somewhat comforting given that the total number is greater than that for demand. However, we remain to be assured that all of the various needs have been accounted for.

We remain sceptical of the likely progress towards achieving the target, given the example of the former Girls' College (see para 6.47).

We will watch with interest the progress made with regard to those housing sites for which planning approval has already been given and the ability of the land-owners and the construction industry to respond. Surely the provision of homes has a much greater social priority than the creation of more office space which seems to encourage more inward migration of specialists in the upper ranges of income seeking larger and more expensive 'windfall' homes. Building apartments and other forms of rental and first-time homes as well as those dedicated to the older generation in down-sizing mood is also likely to provide employment to the locally un-employed.

The question then becomes – where?

Housing Policy H1 & H2 & H5

There is little doubt in our mind that bringing forward appropriate, publicly-owned sites has to be a high priority for keeping the underlying cost of land provision and is 'brown-field' land in most cases.

Are those sites listed in paras 6.47 and 6.48 in St. Helier, and 6.55 and 6.56 in St. Helier, St. Clement and St. Brelade, the only ones? - We agree that St. Helier should be where the concentration of replacement 'new build' is preferred under various related States policies. This must however be integrated with the consequential increased demand within Education's portfolio of schools as well as at 'private' schools. Similarly, increased public transportation must be a factor. And so on.

This Review appears to have much greater expectations that private re-zoned land will be more readily transformed into housing sites. Paras 6.49 through to 6.68 apply [save for paras 6.53 – 6.56].



At face value, it appears that spent glass-houses are a likely source but we appreciate that there has been considerable opposition to some of these in St. Clement.

Summary

We are not in a position at this time to delve deeper in to the pros and cons of specific sites proposed. If our views are further sought, then we will do our utmost to assemble meaningful comment and observations, based on our own research in the coming months.

Meanwhile, we urge all those involved at the next and further stages in this review to have regard to the particular needs of the disadvantaged now in Jersey rather than those advantaged people who might be attracted to the Island for whom there appears to be no shortage of housing.

A handwritten signature in blue ink, appearing to be "Nt".

Monsignor Nicholas France