Department of the Environment
Planning and Building Services
South Hill,
St Helier, Jersey, JE2 4US
Tel: +44 (0)1534 445508
Fax: +44 (0)1534 445528

States of Jersey

2011 Island Plan: interim review
Examination in Public

Statements: Housing – Policies H1-H5

Housing - general

Q1. Are the proposals consistent with the strategic policies in the Island Plan, especially SP1, 2, 4, and 6?

The Minister is of the view that the proposed strategy for the delivery of affordable homes, as set out in the Minister's proposal, is entirely consistent with the strategic objectives of the 2011 Island Plan, and particularly the following:

- Policy SP1: Spatial strategy
- Policy SP2: Efficient use of resources
- Policy SP4: Protecting the natural and historic environment
- Policy SP6: Reducing dependence on the car

The essential thrust of these strategic policies is to focus development activity in or adjacent to the Island's principal built-up areas to ensure that the most sustainable pattern of development is achieved. They also seek to promote the use of already developed land and to ensure that the need to travel is reduced and/or that travel choices are optimised. The Minister's proposed strategy for the delivery of affordable homes responds positively in respect of all of these objectives.

Over two-thirds of the proposed provision of affordable homes, as set out in the Minister's strategy for the provision of affordable homes, is focussed on sites within the Island's existing built-up area. This includes the proposed provision of homes on existing States-owned sites (Policy H1); the redevelopment of existing housing estates administered by the Housing Department; and the development of sites already zoned for affordable homes (Policy H2). By focussing the provision of affordable homes in existing built-up areas, this ensures that new residents have the best access to facilities, services and infrastructure that already exists, and also reduces the need to travel or provides people with more opportunity to walk and cycle to work, school or to local facilities, because journey lengths are likely to be shorter.

Of the homes to be provided on sites proposed for rezoning less than 2% are proposed to be provided on greenfield land, as a proportion of overall supply. This only amounts to 6% of homes as a proportion of affordable housing provision. At a strategic level, therefore, the Minister is seeking to ensure that development activity is very much focussed on land which has already been developed in some way to ensure that, as far as possible, the Island's most valuable coast and countryside is protected from development.

The majority of sites proposed for rezoning to provide affordable homes are on the edge of the Island's main urban settlement (comprising St Helier/ St Saviour and St Clement see: settlement hierarchy pp. 18, 2011 Island Plan) and propose the release of land that already has been subject to some form of development, as glasshouses.

Where sites have been put forward for the development of new homes on greenfield sites i.e. F.622, St Ouen and F.402, St Martin under the auspices of :policy H5, the Minister has sought to ensure that the justification for the release of this land is robust and that there is evidence of local need.

Housing – demand/need

Bearing in mind the population growth policy in the States Strategic Plan (2009-2014) Priority 5, the 2011 Census, recent rates of growth, the population and household forecasts, the most recent Housing Needs survey, and other relevant information:

Q2. Are the forecasts in the section on "Demand for Homes" (paras 6.15-37 and summarised in Table 6.2) reasonable?
Do they under-estimate, or over-estimate, the demand (or perhaps the "need") for housing development during the Plan period?
Is there sufficient flexibility to respond to any changes arising from the Long Term Plan mentioned in para 6.20?

Background

The housing demand figures shown in the proposed revisions to the Plan are based on work undertaken by the Statistics Unit. This takes into account new population and household modelling, which uses the 2011 Census results and addresses demand for new homes from new households. It also embraces the findings of the latest Housing Needs Survey (2012) and in so doing addresses latent demand. The Statistics Unit have confidence in the robustness of its evidence base for determining potential housing demand for the period 2013-2020.

It is, however, recognised that estimating levels of population and the subsequent demand for housing is not an exact science and fluctuations are inevitable overtime. For example, net inward migration had slowed considerably since 2009, but the inward flow of migrants was still nearly double the rate envisaged by the policy[1].

Subsequently through careful monitoring and review, policies have been developed and adopted by the Council of Ministers to specifically address the management of population growth and migration and these, together with the proposed housing policies in the current Island Plan review, will enable a flexible and positive approach to be adopted with regard to future housing requirements.

Current trends

The 2011 Census results showed that Jersey's population was 97,587, which is an increase of nearly 10,000 since the 2001 Census. Net inward migration of 6,800 people since 2001 had accounted for over two-thirds of a 10% increase in the Island's population, mostly during a peak period between 2005 and 2008. More importantly, 70% of those new migrants were 'non-qualified', meaning that they had no housing rights to occupy or purchase locally qualified housing stock.

As a result of these migration trends, results from the last housing needs survey indicated that there is an overall small overall shortfall (60) of non-qualified housing (mainly 1 bedroom accommodation). It can be argued that this is not significant when compared to shortfalls for owner occupied (over 1000) and social rental (over 400).

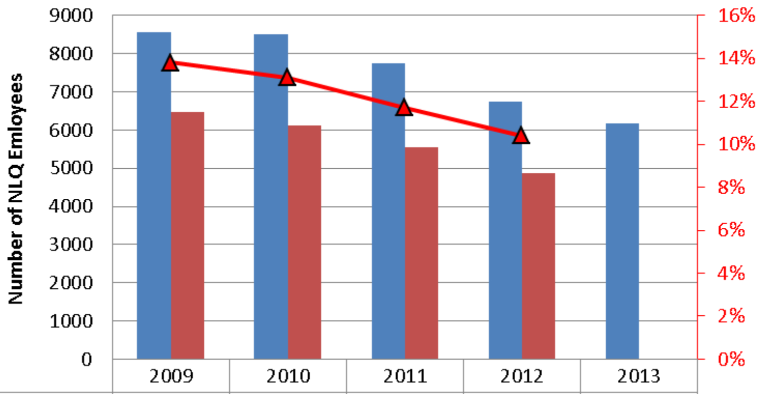
A number of new policy initiatives, as outlined below, have recently come into effect and these have started to impact on net levels of migration and inevitably demand for homes.

Chart 1 shows the decline in the number of non-locally qualified people employed in the private sector in both June and December of each year since 2009. In both December 2012 and June 2013, the number of non-local employees was the lowest for the time of year in question for at least ten years.

---

[1] Maximum inward migration at a rolling five year average of no more than 150 heads of household per annum (an overall increase of c.325 people per annum).

Chart 1: Non-Locally Qualified Employees

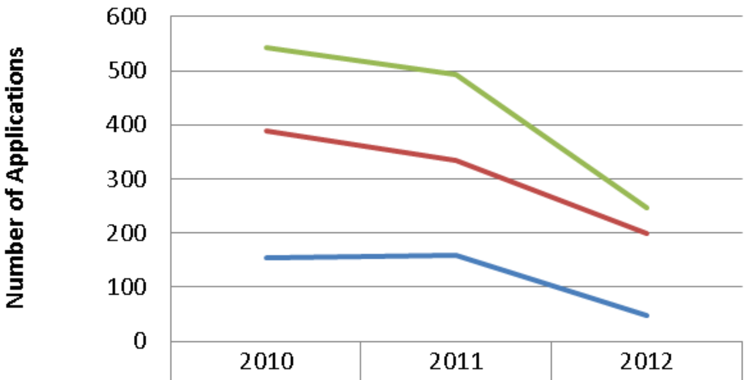


	2009	2010	2011	2012	2013
June	8560	8510	7750	6730	6160
December	6460	6110	5540	4860	
% of total December workforce	13.80%	13.10%	11.70%	10.40%	

The December figure is best representative of baseline employment by excluding summer seasonal peaks. This shows that the non-locally qualified staffing has shrunk from nearly 14% to 10.4% of the total private sector workforce in the Island over the last five years.

A key aim of current policy is to tightly control the number of permissions for businesses to recruit non-locally qualified staff and Chart 2 illustrates this policy in action. It shows the total number of applications received and granted for non-locally qualified staff from 2010 to the end of June 2013 as well as the overall decline in the number of such applications. Processes have been put in place to ensure coordination between the Housing and Work Advisory Group and the Back to Work Programme to support the engagement and training of local people by businesses. Officers from Back to Work comment on all applications for registered staff before they are considered by the Advisory Group.

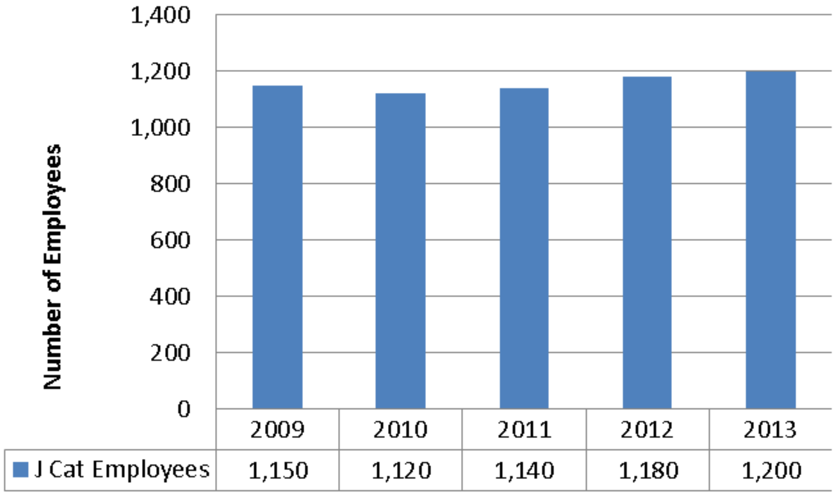
Chart 2: Non-Locally Qualified Staff Applications



	2010	2011	2012
Granted	154	158	47
Refused	390	334	200
Total	544	492	247

Chart 3 shows that the overall number of licensed employees working in the private sector in Jersey has remained relatively stable over the last five years, showing an increase of just over 4% since 2009. J Category employees comprised just 2.4% of the Island's private sector workforce in June 2013.

Chart 3: Licensed Employee Permissions



Permissions for licensed employees decreased from an average of 450 in 2010 and 2011, to just fewer than 400 in 2012.

Policy Measures – Long Term Flexibility

The recent trends in migration and population changes can in part be down to the Council of Ministers setting the '***Management of Population Growth and Migration***' as a Priority. An immediate focus was to strengthen the mechanisms to control immigration whilst detailed modelling was commissioned to analyse different policy options regarding economic participation, productivity and structural change in the economy and their implications for a sustainable new immigration policy.

The Strategic Plan identified five Key Actions in support of this Priority.

1. **Update the population model using the new Census information and bring realistic targets for population and immigration limits to the Assembly by July 2013.**

   A revised Population Model based on data from the 2011 Census was published by the States Statistics Unit in September 2013.

2. **Use legislation to support the engagement and training of registered people and only grant permissions for additional non-locally qualified staff in limited cases over the next 12 months.**

   The number of non-locally qualified employees has declined since 2009 (see chart 1) and the number of applications granted has also fallen (chart 2).

3. **Continue to issue licensed employee permissions only where high economic or social value is demonstrated, where local staff are not available and which safeguard or create employment.**

   The number of licensed employee permissions has remained stable over the last 5 years (chart 3)

4. **Introduce legislation to significantly improve migration controls, including a new Population Register.**

   The new Control of Housing and Work Law was introduced on 1st July, 2013, including a population register, improved compliance capabilities, and a streamlining of processes.

5. **Review current migration controls and report to the States on findings, including recommendations, within 12 months of the introduction of the new legislation.**

   This review is planned to take place in the summer of 2014, including an assessment of the "5 year rule"; photographs on registration cards; exemptions. Findings from the review will support the development of a long term Strategic Plan and associated population policy in 2015.

Conclusions

The estimates for the demand for homes is based upon sound statistical evidence and sustainable population policies have been developed to ensure that future population levels can be managed in order to meet the key objectives of having a sustainable economy and safeguarding its resources.

The continual monitoring of population and migration and strategic policy initiatives introduced by the council of Ministers to tackle the '***Management of Population Growth and Migration***' will ensure that sufficient flexibility exists to respond to any changes arising from the Long Term Plan mentioned in para 6.20.

Housing – supply of homes

Q3. Leaving aside specific sites for later debate, is the supply of homes (paras 6.38-6.85 and summarised in Table 6.3 and Proposal 20) reasonable?

The estimates of supply are based upon a combination of historic trends of windfall developments and specific knowledge of sites that will be developed for housing over the Plan period. These are detailed in the latest Residential Land Availability report (January 2013)[2] and are considered to be reasonable. More recent evidence, since the publication of this report at the beginning of 2013, suggests that these numbers are still robust and, in some cases, there is evidence of potential additional supply from sites.

As already published in the report referred to above, there are approved planning consents for residential developments with a potential yield of circa 2,000 homes and some of the more significant sites (e.g. Westmount Quarry) are now being built out as the economic circumstances improve.

The timescales for the delivery on States owned housing sites has also been reviewed and updated and these are still on target and in some cases will deliver additional supply (see table 1, below).

A viability assessment of the H1 sites has also been carried out by the Property Holdings Department, based upon the revised definition of affordable housing, and this work has demonstrated that the sites would be viable for the level and tenure mix as detailed in the housing site assessments.

In summary, the supply of homes (paras 6.38-6.85 and summarised in Table 6.3 and Proposal 20) is, therefore, considered to be reasonable and robust.

[2] https://www.gov.je/Government/Pages/StatesReports.aspx?ReportID=970

Q4. In particular are the figures for the redevelopment of States-owned sites, and the two figures for windfall sites, reasonable?

From 2014 the States owned housing portfolio will be managed by a newly formed housing company and a significant investment plan[3] has been put in place that will enable the refurbishment and re-development of existing housing stock and sites. This will have positive long term benefits to the supply of affordable housing.

Another important change is that social rental values are to be raised to near 90% of market values[4] and this may also encourage the development of social rented sites by both private social registered land lords and the new housing company as this may be regarded as a more attractive and lower risk investment option.

Taken together, these recent changes have already started to benefit the supply of affordable housing and can been seen in more detail in the future supply estimates in table 1.

The figures in table 1 are an update on those published in the 2011 Island Plan: interim review and are based upon either specific development briefs undertaken by the Department of the Environment working with the Housing Department or actual planning permits, which were not issued at the time of writing the current 2011 Island Plan.

Table 1: Housing company site summaries

Housing Department sites	Cat A	Status
Le Squez - Phase 2c	24	Completion due 30/6/14
Le Squez - Phase 3 & 4	32	Planning application in for Ph. 3. (137 new units - 105 demolitions) Ph. 3 start on site: 25/8/14
Field 516, 517 & 518	80	On site - early completion expected 30/1/15
Journeaux Street - 2 - 4	9	Completion due 16/12/13
Le Coin	23	Commencement 2/12/13
Belle Vue - Phase 1	35	On site - completion due 30/1/15
Belle Vue - Phase 2	47	Planning Application submitted Start on site anticipated 1/10/14
Ann Court	190	Feasibility study to be undertaken by JHT (200 new units - 10 demolitions)
La Collette Low Rise - Phase 1	51	Feasibility to commence 16.12.13 (59 new units - 8 demolitions)
La Collette Low Rise - Phase 2	51	Feasibility to commence 16.12.13 (102 new units - 51 demolitions)
Total	**542**	

It is worth noting that 80 units from fields 516,517 and 518, which in the existing 2011 Island Plan are part of the existing policy H2 supply, are now included in the revised table as 48 of these have recently been acquired by the new housing company and 32 by the Parish of St. Saviour. Furthermore, revised supply figures for Ann Court show an estimated additional supply of up to 50 units, subject to a feasibility study.

Table 1 indicates that the supply of affordable housing from Housing Department/company stock is based upon solid, measurable assumptions and, therefore, entirely reasonable.

Windfall rates

[3] Investment Plan set out in R.15/2013 will cost £207m (http://www.statesassembly.gov.je/AssemblyReports/2013/R.033-2013.pdf)

[4] For new tenancies after 1.4.14

The windfall developments are based upon the evidence of previous trends coupled with conservative future estimates. For example, in table 6.3 the total windfall estimate for both town and outside of town housing supply is 2,400 over the remaining Plan period of 8 years, equating to 300 units per year on average. This compares to an annual average of 364 units per year over the period 2002-12, as evidenced in the latest residential land availability report (January 2013).

Recent internal reviews of the town capacity has also supported the estimated windfall rates for the town, as there is anecdotal evidence, through pre-application enquiries, that a number of key sites to the north of town are now starting the process of shifting from commercial (office) to residential uses, predicated by the development of new Grade A office space on and around the Waterfront.

Q5. Are the States-owned sites (in Policy H1) likely to come forward in the timescale proposed? Might other States-owned sites come forward?

The development of the States owned sites are still estimated to come forward in the timescale proposed in the 2011 Island Plan: interim review (2013-20), as follows:

Former Jersey College for Girls – This is subject to a live planning application (submitted March 2013) and a decision is expected in early 2014. The application includes 40 units social housing, although States of Jersey Development Company (SoJDC) is preparing scenarios to increase the number of social housing units to potentially 75).

Subject to the award of planning permission, development is likely to commence at the end of 2014 and be completed in 2016/17 (as planned).

Summerland and Ambulance HQ site – A planning application has been approved subject to agreement of the planning obligation agreement for the provision of affordable housing on these sites.

Development cannot commence until the States of Jersey Police (Phase 1) and the Ambulance HQ (Phase 2) are relocated. It is likely to be completed between 2016 and 2020 (as planned).

La Motte Street Youth Centre - This site will not be available until all Youth Service functions have been relocated to St James by mid-2015. This site remains to be developed in the period 2016-20 (as planned).

Norman's former Timber Yard – issues of land ownership are presently the subject of consideration by law officers: the development of this site for affordable homes may, therefore, be in jeopardy.

The potential removal of this site may reduce the supply of Cat A homes from States-owned sites by up to 50 units, although this may be offset by an additional and/or enhanced yield from other States-owned sites (such as from increased supply on the Ann Court, JCG sites or from those described below) over the period 2016-20.

Other States-owned sites

A number of additional States owned sites have been reviewed for housing development potential, which may come forward over and in some cases beyond the planned period (2013-20). It is presently envisaged that these sites will only be developed for Category B housing, unless future States decisions require them to be developed for Category A housing.

Future development decisions on these sites may however be influenced by the recent changes in social rental values, (to near 90% market values), and so it is possible that additional category A housing may come forward as a result.

Table 2: States of Jersey potential future housing sites

Site	Cat A	Cat B	Year	Note
La Folie	0	39	2018+	It has been agreed with the Regeneration Steering Group (RSG) that all units will be Cat B and the Cat A requirement would be provided elsewhere on States land built out by SoJDC in support of the States Strategic Policy
South Hill Offices	0	100	2018+	It has been agreed with RSG that all units will be Cat B and the Cat A requirement would be provided elsewhere on States land built out by SoJDC Site to be developed when relocation of TTS and P&E staff achieved. 100 Units is SOJDC estimate.
St Saviours Hospital (South)	0	172	2020+	Pending relocation of functions to Overdale. A Masterplan for relocation is to commence in 2013. It has been agreed with RSG that all units will be Cat B and the Cat A requirement would be provided elsewhere on States land built out by SoJDC in support of the States Strategic Policy.
St Saviours Hospital (North)	0	45	2021+	Clinique Pinel and Rosewood House sites. Pending relocation of functions to Overdale. A Masterplan for relocation to commence in 2013. It has been agreed with RSG that all units will be Cat B and the Cat A requirement would be provided elsewhere on States land built out by SoJDC in support of the States Strategic Policy
Current police Station site (former school)	TBA	TBA	2018+	The co-location of the Ambulance and Fire services may be achieved on a footprint smaller than the current site. If this is the case there may be an option to extend the current social housing development at Brighton Close.
Le Bas Centre	TBA	TBA	2020+	If current facilities are relocated to Overdale, This site could provide Cat A units. No scheme has been prepared.
Bellozanne/ Beresford House	TBA	TBA	?	Potential for release of residential development land at Bellozanne if TTS activities are restructured. Masterplanning for the site has recently commenced.
Totals	**0**	**356+**		

Q6. Under what circumstances would the use of CPO powers be appropriate/?

In developing proposals to provide the affordable homes that the Island needs, the Minister has sought to ensure that sites proposed for rezoning are realistic and deliverable. In this respect, he has sought to ensure that these sites are not only appropriate in planning terms but also have a reasonable prospect of being brought forward for development.

He has sought to do this by engaging with landowners, as far as possible having regard to due process within the process of reviewing the Plan, and providing them with an opportunity to participate. In so doing, the Minister is reasonably confident that, for the majority of sites proposed for rezoning, the proposed allocation of land for the provision of affordable homes will create sufficient enough incentive for these sites to come forward for development in a timely manner in order to ensure the provision of affordable homes within the Plan period.

It is considered, therefore, that the use of compulsory purchase powers to facilitate the delivery of affordable homes would only be used as a last resort in circumstances where insufficient land for the development of affordable homes had come forward during the Plan period. It is suggested that this might only be invoked where there were critical issues of housing supply to be addressed.

It is, however, considered pertinent and justifiable to include the use of CPO powers as a policy provision in the Plan to demonstrate an intent that the Minister considers these sites to be appropriate, in planning terms, for the provision of homes and that the use of these powers would be considered to help contribute towards a pressing Island need.

It is also considered relevant to note that similar provision was included in the 2002 Island Plan (Policy H5): they have not been invoked.

The use of compulsory purchase powers would, as a matter of legal necessity, require a specific and separate decision of the States in accord with the Compulsory Purchase of Land (Procedure)(Jersey) Law 1961.

Housing – affordable housing

The Minister proposes that Policy H3 is replaced with Proposal 3. The policy requiring the provision of affordable homes as a proportion of private housing developments is proposed to be set aside, and land is allocated specifically for category A housing in other policies.

Work will be undertaken to research and develop alternative policy mechanisms to capture value from the development of land to support the provision of affordable homes.

Q7. Is it right to set aside the previous Policy H3?

The decision to set aside the previous policy H3 was the result of a lengthy consultation and review of the policy with key stakeholders. An overview of this process is outlined below;

Table 3 – Policy H3 chronology

Date	Milestone/ event
July 2011	2011 Island Plan approved
August 2011	DoE engage affordable housing consultants to develop supplementary planning guidance for operation of Policy H3, including viability assessment model
November 2011 – March 2012	Development of SPG and viability model by DoE consultants
April – July 2012	Informal review of SPG and model with development industry
August – September 2012	Closed consultation on revised draft SPG and model with development industry
October – December 2012	Minister for P&E meets Jersey Construction Council to consider industry feedback and concerns
December 2012 – February 2013	DoE review options for delivery of affordable homes • Significant concerns over the viability of housing development where affordable element included. • Alternative sources of supply and replacement policy mechanism to be reviewed and considered.
April 2013	Chief Minister updates States Assembly about strategic priorities, including delivery of affordable homes
April – July 2013	DoE requested to revise Island Plan Housing Chapter to include work: • with Jersey Property Holdings to assess viability of development of social rent homes on rezoned sites • with Law Officers Dept,, Strategic Housing Unit and Stats Unit to better define affordable housing (Cat A).
July 2013	Minister for P&E signs off draft Island Plan housing chapter for consultation with support of other Ministers
29 July 2013	Formal public consultation on proposed change to 2011 Island Plan published.

In conclusion, the Council of Ministers considered that there was a significant risk that the delivery of affordable housing would not materialise from Policy H3 based on the concerns expressed by the development industry and landowners that the scheme was unviable: it was considered that there was considerable risk that land would not come forward for development.

It is also relevant to note that the economic context for the development and implementation for this policy was not a positive one, particularly for the Island's development and construction industries. There was political concern to ensure that jobs were safeguarded and that government should be seeking to introduce initiatives that would encourage economic recovery.

Accordingly it was agreed that the Minister for Planning and Environment would set aside the policy and develop an alternative strategy to enable the delivery of affordable homes. The Minister's strategy seeks to make better use of States assets and also to rezone some private land to deliver affordable homes.

It was also agreed, however, that the Council of Minister's still wished to explore how best to capture development value of land and that work would be carried out to research and develop alternative policy mechanisms as part of the review of the Island's property taxes, led by the States Treasury.

Q8. The approach taken in the proposed revisions is to deliver more affordable homes on States- owned land and to allocate private sites specifically for Cat A housing. Is this revised approach more appropriate and workable?

The decision to set aside Policy H3 has meant that an alternative strategy for the delivery of affordable homes has been required that is capable of delivery to ensure a supply of affordable homes to meeting anticipated need over the Plan period.

The use of States-owned land to provide affordable housing provides considerably greater certainty in the delivery of homes. This part of the affordable housing strategy is focussed on both seeking to increase the yield of new homes from the regeneration of existing Housing Department housing sites, as well as using other non-housing States sites to contribute towards the provision of affordable homes.

The provision of new homes on existing States Housing Department sites is a robust and achievable form of supply, and this is detailed in table 1 above. The States Assembly has, in approving the recent 2014 Budget and a £250M investment in housing, provided additional certainty and confidence that housing renewal and regeneration will be delivered.

Whilst always subject to competing pressures for other uses and/or disposal to generate capital receipts, the use of other non-housing States land can also provide a more reliable source of affordable homes. Within the context of the 2011 Island Plan period, agreement has been secured that those sites referred in the Minister's revised Policy H1 will be used to deliver, in whole or in part, affordable homes. The response to Q5 above sets out the current situation with regard to the status of these sites and their ability to deliver homes.

Whilst not proposed and/or forecast in the 2011 Island Plan interim review it is also clear, from table 2 above, that there exists the potential to use other States-owned assets to deliver affordable homes.

The principal thrust of the revised affordable housing strategy contained with the Minister's proposals is to deliver affordable homes on States-owned land for the reasons set out above. The Minister has also proposed that approximately 300 affordable homes might be delivered from the release of private land under the auspices of Policy H1. The basis for coming forward with his element in the strategy is that these sites have already been the subject of prior consideration and, in planning terms, are considered to relate appropriately to the existing strategic objectives of the 2011 Island Plan. Furthermore, as set out in response to Q.6, the Minister is reasonably confident that, subject to the support of the States Assembly in approving the Minister's proposed amendments, these sites can be brought forward for development and that homes can be developed on them in a timely fashion.

Q9. Are there other measures which should be adopted to address the problem of affordability, including the capture of value from the development of land?

Work is currently underway, led by the Treasury Department to review all current property taxes charged in Jersey. Part of this review will be to undertake a comparative review of different forms of property taxation applied internationally, with the intention of evaluating whether any would be appropriate for Jersey, including the potential for introducing a land development tax or similar.

The Department of the Environment will collaborate on this review and discussions are already underway.

Q10. Leaving aside the mechanism for delivering affordable housing, is the definition set out in para 6.13 reasonable?

The current definition of Category A housing was deemed to be too broad and not targeted at meeting those households in need of truly affordable housing. For example it included a specific requirement that households had to be first time buyers and although this had some effect in keeping in check the price of Category A housing, the number of first time buyers with significant incomes and savings meant that the prices were still at near market levels.

The lack of income eligibility criteria meant that, for example, a millionaire first time buyer could be eligible for a Category A house, whilst equally an applicant that may have previously owned property but was now in circumstances where they had affordability issues, (e.g. through a divorce), was not eligible.

A revised definition was, therefore, needed and the eligibility criteria, particularly around household income levels, needed to be targeted at those who truly need affordable housing.

The States Strategic Housing Unit was recently established by the States of Jersey and has been charged with driving strategic housing policy. The revised definition was formulated with this team and other key contributors, such as the States Statistics Unit who have carried out work on housing affordability[5].

The use of median incomes in the definition was based upon work carried out by the Statistics Unit and is line with a number of other positive and successful affordable housing policy measures, such as the right to buy and the deposit loan schemes. This will ensure that all of the H1 sites are dealt with equitably and measures will be put in place to ensure that all future sales from these sites will be controlled though the Housing Gateway to ensure that these units are truly affordable for future owners as well.

States of Jersey Property Holdings have carried out work on each of the sites and this confirmed that, based upon the revised definition of affordable housing, they are viable for the delivery of affordable homes for purchase and social rent.

The Minister for Planning and Environment also wishes to ensure that the development of affordable housing meets with the latest design standards and encourages innovative construction methods. These are laudable and achievable objectives and considered appropriate for inclusion in the definition.

[5] https://www.gov.je/Government/JerseyWorld/StatisticsUnit/Prices/Pages/HousingAffordability.aspx

Q11. **Is the proposed tenure split (80/20) the most suitable (bearing in mind that the States can adjust this figures in the light of further evidence – 6.100)?**

The evidence of affordable housing need is derived from the 2012 Housing Needs Survey in which the demand is estimated at 400 social rental (80%) and 100 homes for purchase (20%).

The 2012 Housing Needs Survey showed that there was a potential net shortfall of more than 400 dwelling units of social housing for the upcoming three-year period 2013-2015. This net shortfall was driven by that for 2-bedroom dwelling units.

The magnitude of this potential shortfall was in close agreement with that implied by the Housing Department waiting list for social housing.

Previous rounds of the Housing Needs Survey (2000-2008) had recorded potential net surpluses of social housing, suggesting that the demand for social housing has increased in recent years. This latest demand includes that from key workers, defined as locally qualified employees (a-h category) working in the public sector and in private sector education and health services.

The 2012 Housing Needs Survey also indicated a potential net shortfall of approximately 100 owner-occupier 1-bedroom dwelling units, after application of affordability criteria based on household income and property prices.

Combining the shortfalls in social housing and owner-occupier accommodation implies that there is a total net shortfall of some 500 units of affordable 1- and 2-bedroom accommodation across these tenure categories for the period 2013-2015.

Whilst there is the potential for the proportionate split between tenure types to change even during the Plan period as new evidence, from a further housing needs survey, comes to light it is considered relevant to note that this policy regime applies to a limited number of sites which, if approved, could come forward for development in the short-term and would be unaffected by any further change in demand across tenures.

It is also relevant to note that there is potential for the tenure type to change (i.e. from social rent to affordable homes for purchase) once homes are developed: this will be a matter for the social housing landlord working with the Strategic Housing Unit to assess variations in need at any one time.

Q11a Does the Plan deal adequately with the need for lifetime homes/housing for the over 55s? Is the role of the Parishes and that of the States clear in this respect?

The 2011 Island Plan explicitly acknowledges the challenge posed by the ageing population and the planning implications of this are recognised (see paras 6.150 – 6.153, pp/243). Specifically, the Plan acknowledges that there will be an increased demand for housing to meet the needs of the elderly in the form of housing that is able to offer varying degrees of sheltered care as well as being capable of adaptation and providing viable living accommodation for those with reduced mobility.

The specific response of the Island Plan to this challenge is represented by Policy H7: Housing to meet special requirements, which presumes in favour of the provision of such housing, including sheltered homes, where this meets an identified need and where it is within the Built-up Area. (see appendix 1).

This policy positively encourages the provision of a specific form of accommodation that is not only responsive to the specific requirements of the elderly, but is also provided in a location where there is better access to local services and facilities that elderly people might need and more easily use.

It is also relevant to note the general support provided by both the Island Plan and other parts of the planning and building system in Jersey to respond to the challenges posed by the ageing society.

The first of these general responses relates to the matter of the specification of new homes in the Island.

Since 2007 **all** new homes in Jersey have been built to local Lifetime Homes standards (amended in 2012), which includes improved provision for access to, use and adaptation of dwellings to better meet the requirements of an ageing society and which better enables people to remain in their own homes for as long as possible: this is required through Building Bye-Laws (see Part 8: Access to and use of buildings, Technical Guidance document: http://www.gov.je/SiteCollectionDocuments/Planning%20and%20building/TD%20Part8AccesstoandUseofBuildings%202007%20(2012%20amendments)20120720%20MM.pdf).

The second of these general responses relates to the provision of overall housing supply.

The Minister's proposed amendments to the 2011 Island Plan recognises the need to provide more homes in the Island and, in so doing, this will assist in the general provision of homes that meet the needs of an ageing population in terms of their specification (to lifetime homes standard as set out above) and also in terms of their size, which through Policy H4: Housing mix, can be targeted to ensure that sufficient provision of one-bed units in particular is made, recognising the demographic changes produced by the ageing society.

Indeed, the 2012 Housing Needs Assessment for the period 2013 - 2015 showed an overall potential shortfall of more than 400 units of social housing and of 260 qualified one bedroom units; and many of these units will be needed for older persons. The Minister's proposed changes to the 2011 Island Plan respond to this need.

Similarly, the Housing Gateway (@ September 2013) recorded a net requirement for 764 homes for social rented accommodation, of which 192 are from over 55 years olds (including persons who are under-occupying property, in medical need, over-crowd conditions, and under eviction, and with poor housing standards). The Minister's proposed changes to the definition of Category A homes will specifically target assistance to these people who would qualify to access a new Category A home on any of the sites proposed for rezoning.

The Minister would also wish to draw attention to the fact that the provision of homes specifically for elderly people is relatively healthy (as at the end of 2012) as reported in the Residential Land Availability Report (Jan 2013) (see table 10) which indicated that there was planning permission for 126 homes with 116 under construction and the potential for a further 46 units to be made. This included provision in both open market and social rent sectors.

It is also relevant to note that a critical plank in the Island's new health strategy (Health and Social Services: a new way forward P.82/2012) is to increase the number of service users being cared for outside of a hospital or residential care setting and to enhance community services to develop and deliver care to an individual's home: it is considered that this will serve to support more people in the own homes and reduce the number of people and/or time people need to spend in a more sheltered environment.

APPENDIX 1
Island Plan 2011: extract

Housing to meet special requirements

6.150 The Minister for Planning and Environment wishes to ensure that new housing will, as far as possible, contribute to the needs of people with disabilities and of those who require care - including the elderly, people with disabilities and other vulnerable people.

6.151 The forecast change in population by broad age groups for the period 2009-2018 (under the +150 heads of households per annum migration scenario) predicts that almost all of the estimated growth will be in the over 60 age group. The proportion of people aged 75+ years will rise by 32% and those aged 85+ years will grow by 36%: this is a dramatic increase in potentially vulnerable elderly couple and elderly single person households. The Housing Requirements Study in 2000 identified that some 16% of households in Jersey contained somebody with a disability and of these, 6% contained someone who was a wheelchair user (approximately 1% of all households) **(39)**.

6.152 These statistics have the potential to pose a considerable challenge in terms of an increased demand and requirement for housing to meet special needs: special needs housing is defined to include nursing and residential care homes, and sheltered housing, where the residential accommodation meets the needs of various groups of people through the provision of varying degrees of support, for rehabilitation and out-of-hospital care.

6.153 Where new facilities are proposed, these should be located within the Built-up Areas of the Town or Key Urban or Rural Settlements as defined in the Spatial Strategy**(40)**. This should enable non-car access to basic facilities, and help raise the quality of life for residents. It will also be important to consider the adequacy of and access to local health care facilities such as doctors' surgeries.

Policy H 7

Housing to meet special requirements

Proposals for housing to meet special requirements, including the specific needs of the elderly and those with disabilities, including sheltered accommodation, residential care and nursing homes, will be permitted provided that the development;

1. meets an identified need;
2. is within the Built-up Area boundary;
3. is not on land zoned for Category A housing purposes, unless specifically provided for in a development brief.

39 Although 4% of dwellings have been adapted for a disabled person, there is a large mismatch between adapted dwellings and those with disabilities, with only 4% of people with disabilities living in an adapted home. States and parish rental housing and owner-occupied dwellings have the greatest percentage of adapted dwellings, at 8-9%, reflecting the higher proportion of elderly persons within these sectors.

40 see 'Sustainable development'