

**Representations in
Respect of:**

**The 2011 Island Plan
Interim Review**

July 2013

States of Jersey

Prepared by:

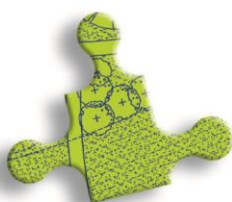
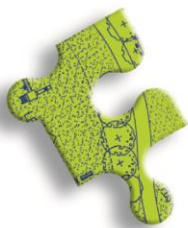
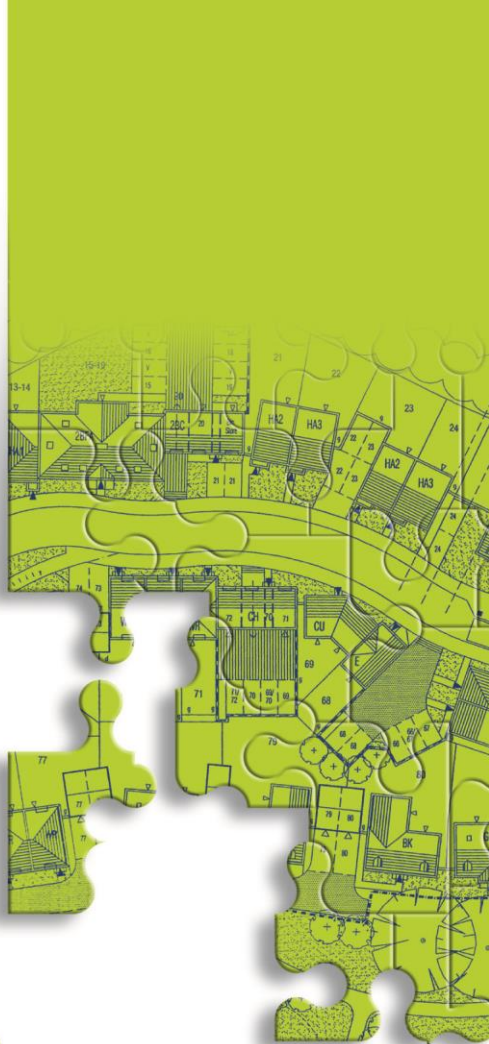
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1. INTRODUCTION

- 1.1 This report responds (on behalf of MS Planning Ltd) to the Jersey Island Plan Interim Review (“JIP Interim”) published for consultation by the States of Jersey (States) Planning and Environment Department in July 2013.
- 1.2 The Jersey Island Plan 2011 (“JIP 2011”) is the current planning policy document for the State of Jersey. The Minister for Planning and Environment wishes to revise parts of the JIP 2011, the proposals of which have been publicised in the JIP Interim.
- 1.3 Included in the proposed amendments are modified levels of demand for housing within the plan period (Table 6.1), and the supply to meet such demand (Table 6.3). This report raises concerns in respect of the accuracy of the assumptions summarised in these tables and questions whether an appropriate evidence base has been drawn upon.

2. POLICY CONTEXT

- 2.1 There are five key areas referred to within the States Strategic Plan 2009 - 2014 ("SP"), one of which includes 'housing challenges.' A key factor within this area is the effective management of Jersey's population.
- 2.2 A further objective within the SP is to 'adequately house the population' and it highlights that there should be adequate housing for all islanders - if islander aspirations to own their own homes are to be met, then homes will need to become more affordable, with the affordable homes being targeted only at those who need them.
- 2.3 It is also noted that, in terms of housing to assist the most economically challenged households, the SP identifies that:
- "Jersey has a good stock of affordable homes to rent across the providers which ensures a safety net for the most disadvantaged in society. Ensuring that stock is used to best effect would be a significant step towards seeing that all residents are adequately housed."*
- (Page 29 - emphasis added)
- 2.4 Therefore, the approach set out within the SP follows along the lines of that previously taken in the States to housing delivery, and places an emphasis upon the adequate allocation of sites for housing of a mix and tenure to 'meet prevailing demand.'¹
- 2.5 It is requirement of the Planning and Building (Jersey) Law 2002 ("PBL") that the Planning and Environment Committee prepare an Island Plan.² The PBL requires that the Island Plan undergoes a process of public consultation, amended where necessary, and submission to the States for approval.³ The most recent Island Plan came into force on 29 June 2011.
- 2.6 The JIP 2011 replaced the previous JIP 2002, in which the review was prompted by an underestimation of population growth and the amount of land that would be required to resolve the housing issue of this population.
- 2.7 The following sections of this report consider and comment upon the proposed changes to the JIP 2011 set out within the 2011 Jersey Island Plan Interim Review (published for

¹ The states strategic plan 2009-2014, Page 30

² The states strategic plan 2009-2014, Part 2, Article 3

³ The states strategic plan 2009-2014, Part 2, article 3

consultation by the States of Jersey – “JIP 2011 Interim”), regarding specified demand for and supply of housing in Jersey.

3. DEMAND

- 3.1 Paragraph 6.17 of the JIP Interim states that the two key factors which most influence the requirement for homes over the plan period are firstly the size and make-up of the Island's population, and secondly residents' housing aspirations and ability to realise them. Paragraphs 6.21 to 6.23 set out that the number of households on the island is a key factor influencing housing demand.
- 3.2 Whilst these factors will undoubtedly influence the future overall numerical housing requirements for the island (i.e. the newly arising need), other factors also need to be taken into account in order to assess backlog (i.e. current) housing requirements (for either category A or B housing).
- 3.3 Paragraphs 6.21 to 6.23 should therefore be amended to reflect research findings in respect of backlog as well as future housing requirements (for both category A and B housing)
- 3.4 The JIP Interim relies upon projected population figures from the Jersey Population Model ("JPM") which was used to generate annual estimates from the period 2005 - 2065. The JPM methodology is published in the Future Requirements for Homes Addendum ("FRFH"). This model and subsequent published paper, is the same model used to inform the JIP 2011, however, it is noted that there is an inconsistency in that paragraph 6.24 of the JIP Interim states that the 2011 Census figures were used to produce the forecast results within the (FRFH). The latest publication is the FRFH addendum which was published in March 2009, thus not portraying up to date 2011 Census figures. Paragraph 6.24 is therefore inaccurate and misleading.
- 3.5 One is therefore left to assume that the estimations for housing requirements have been generated using the same methodology as previously set out within the FRFH addendum, substituting the population figures produced by the 2001 Census report with the 2011 / 12 figures.
- 3.6 Further scrutiny of the FRFH addendum forecasting model highlights assumptions and variables that have not been clearly and transparently explained, as set out in the following sub-sections of this report.

Population Estimation Methodology

- 3.7 The FRFH, on the basis of the 2001 Census, estimated that the 2005 total population figure stood at 88,399; an estimated average annual increase from 2001 of 243 individuals.⁴ The methodology of arriving at this base figure is not transparently set out and does not align with average annual population increases for the period directly preceding (1996 - 2001) which saw an average annual increase of 407 individuals; an increased amount of 41%.
- 3.8 The 2011 Census report estimates Jersey's total population at 98,000; an increase of 8,930 individuals within the period 2001 - 2011 (an average annual increase of 893 individuals). Indeed, according to Jersey's Resident Population 2011 ("JRP 2011")⁵ the base figure (Jersey 2005 total population) used to calculate anticipated housing requirement over the plan period should have been 91,000 (an increase of 2,601 individuals from the 2001 estimate).

Average Household Size

- 3.9 As previously stated, it is evident that the JIP interim has relied upon the FRFH addendum, which has in turn used the same methodologies for calculations as its predecessor (FRFH 2007), despite its express recommendations to consider the implementation of a population forecast model such as the 'Chelmer Population and Housing Model'.⁶

Allowance For Replacement Dwellings

- 3.10 The FRFH 2007 states that 'there have been no detailed surveys of the condition of the Island's housing stock and there is no readily available and substantive information on the number of dwellings demolished / lost (as a percentage of the building rate) in previous years that can be used as evidence to guide future projections'.⁷
- 3.11 As a substitute a 'very rough and ready' analysis of raw data was performed from applications granted consent during 2005. The findings suggested that 12% of approvals were for replacement dwellings. However, a 'more conservative' 5% has been applied without explanation other than simply expressing that looking at the 2005 planning approvals is 'not considered sufficiently large or reliable to inform predictions.' There is a suggestion that past trends have been factored in but no methodology or weighting is made transparent.

⁴ Based on Census 2001 total population figure of 87,186

⁵ Table 1

⁶ FUTURE REQUIREMENTS FOR HOMES – 2005-2035 (February 2007), page 13

⁷ FUTURE REQUIREMENTS FOR HOMES – 2005-2035 (February 2007), page 14

- 3.12 The conservative 5% of building rate has also been applied for the FRFH 2009 amended without an explanation as to whether updated raw data has been implemented, rather than relying on outdated figures from 2005. It is therefore reasonable to suggest that the percentage rate is not appropriate given the lack of a robust evidence base.

Allowance For Vacancies

- 3.13 As with allowances for replacement dwellings, the vacancy rate of 4% has not changed from the FRFH 2007. The 4% vacancy rate has derived from data supplied by the outdated 2001 Census report which suggested 1,849 dwellings were vacant at the time, which represented approximately 5.7% of the total dwelling stock. It seems that decreasing this rate to 4% has been justified by taking the 3% margin used by the UK government and weighting it. There is no justification as to what importance was given to the UK rate, or indeed why it has been factored in at all and therefore cannot be confirmed as appropriate. The 2011 Census report identified a vacancy rate of 7% (3,103 dwellings). Even by applying the outdated UK rate, it is reasonable to assume that the rate has significantly increased.

Inward Migration

- 3.14 The SP established a maximum inward migration of no more than 150 heads of household per annum which equates to an overall increase of approximately 325 people each year. This is explained in the FRFH addendum when it states that Table 6 makes it apparent that the two requirements (+150 / +200) would 'create some challenges in terms accommodating additional requirements for homes.' It suggests that the +150 scenario would be 'more favourable' and 'would be significantly less than the growth in dwellings achieved in the 30 year period from 1971 to 2001.'
- 3.15 This would be a significant decrease when looking at past population trends over the last ten years supplied by the 2011 Census, which suggested an estimated annual population increase of 873 individuals.
- 3.16 Assuming that the method of calculating housing requirement is correct, and taking the average required building rate of the FRFH's table 7 (based on the outdated 2001 numbers), the net annual in-migration requirement for the period of 2013 - 15, based on +150 heads of households is 1,218 dwellings⁸; an increase of 530 dwellings from the reduced household requirement expressed for the same time period in table 6.1 of JIP

⁸ An annual build rate of 406 dwellings for the period 2005 -15.

2011. If applied to the amended (6.1) table in JIP interim, a shortfall of 218 dwellings for the period 2013 - 15 is evident between the FRFH projected housing requirement figure and the reduced household size requirement. The shortfalls published by both may be explained by the demand being satisfied above the projected build rate requirement of 406 dwellings per annum, however, no such explanation or evidence base is given.

- 3.17 For the reasons initially set out in paragraph 3.4 of this document relating to the lack of evidence in the base figures used in FRFH methodology it is not possible to apply the 2011 census data and accurately scrutinise the output numbers applied in table 6.1 of the JIP interim. It would, however, be appropriate to assume that the household requirements are more than that of the JIP 2011 table due to the underestimation of the 2001 population by the FRFH addendum of 500 people according to the Jersey's Resident Population 2012.
- 3.18 However, it seems that the 600 dwellings requirement in the JIP interim for both plan periods has been produced by merely subtracting the elapsed years from the original 1,600 dwelling requirement in the outdated JIP 2011 (table 6.1) which was based on outdated 2001 data, and simply halving the outcome.

Duplication Of Households To Communals

- 3.19 Included in table 6.1 is the subtraction of 100 households from the projected total dwelling demand for the plan period. 'Households to communals' is defined within the FRFH as individuals residing in hotels, old people's homes, hospitals, guest houses, nursing homes, staff accommodation, children's homes, prison's etc. The deduction of this proportion of the demographic suggests that they have been included within the States Statistics Unit calculations. However, Table 5 of the FRFH addendum clearly sets out calculations for household projections ***less*** people in communal establishments, thus, negating the need to detract a further 100 households in table 6.1.
- 2.1.1 Notwithstanding this, it is still unclear how the figure of 100 dwellings was reached by the States Statistics Unit. The FRFH addendum states that at the time of publication 2.74% of the population was living in communal accommodation, which, if applied to the total figures portrayed in table 6.1, suggests a reduced figure of 70 dwellings be deducted.

4. HOUSING ASPIRATIONS

- 4.1 Both the JIP interim and the JIP 2011 highlight the importance in recognising individuals' aspirations and their ability to realise them. The JIP 2011 is considered as the key documentation that sets out Jersey's need for affordable housing. The provision set for such housing within both the JIP 2011 and JIP interim have been informed by Jersey's Housing Needs Survey '07 & '12 respectively.
- 4.2 The JIP interim housing delivery target specified in paragraph 6.28, via base information from the 2012 Housing Needs Survey ("HNS12"), used by the state statistics unit, sets out that a maximum of 400 additional households for the plan period 2013 - 2015 are to be added into the overall housing demand calculated based on population modeling.
- 4.3 However, despite some limited additional detail having been provided within the draft JIP Green Paper (9.3.14), at the time of Housing Needs Survey 2007 ("HNS 07"), it is not transparently clear how this 400 dwellings figure has been arrived at.
- 4.4 The figures quoted in Jersey's Housing Assessment 2013 - 2015 derive from Jersey's annual social survey (JASS); the postal survey was sent out to a random sample of households in June and July 2012. The importance of following a proved procedure in order to accumulate accurate survey data should not be underestimated. The UK's Local Housing Needs Assessment: Guide to Good Practice, whilst not applying to Jersey, provides guidance on providing such data. It states that it is important to emphasise that 'an assessment of needs is not simply a question of going to one source of data, such as a survey.... It is necessary to draw on several different sources of information to obtain even a minimum core numbers required for an assessment of need.'⁹
- 4.5 There is no mention within the HNS 12 of any alternative process such as interviews to verify initial findings of the JASS. It should also be noted that demand for dwellings within the next three years was based on resident households expressing intentions to move within this time. It would be disingenuous to suggest that this assessment of aspirations stretching over a long period into the future represents an accurate portion of the population that will move. It is therefore reasonable to suggest that relying solely on the JASS is not sufficient in providing a comprehensive and robust evidence base; a conclusion reached by the Kelvin MacDonald report¹⁰ when publishing it's independent opinion on the affordable housing supply forecast in HNS 07.

⁹ Local Housing Needs Assessment, A guide to Good Practice, p28

¹⁰ Achieving Affordable Housing as a Proportion of Private Housing Development, published June 2009

5. LAND SUPPLY

5.1 Table 6.3 of the JIP Interim has been amended to reflect a revised supply forecast of 3,670 dwellings comprising 1,120 affordable (i.e. 30.5%) and 2,550 market dwellings. These numerical differences reflect some significant shifts in policy and assumptions such as:

- The provision of additional States owned land.
- More efficient redevelopment of States owned existing housing sites
- Reliance of outdated evidence for development provision in St Helier
- Additional H1 and H2 sites

5.2 The provision of the 590 dwellings to be provided on the States owned land is an increase of 440 dwellings from the JIP 2011 provisions. This increased assumption includes the supply of 290 dwellings being supplied by 're-zoned' private land as a knock-on effect of setting aside Policy H3. This decrease of existing stock has not been clearly identified and taken account of within Table 6.1 or 6.2, nor indeed the evidence base used by the Statistics Unit.

5.3 More-over, it is not clearly identified which sites are identified for re-zoning other than the Jersey College, Ambulance Station, La Motte Street Youth Centre and Norman's Former Timber Yard. With this in mind, paragraphs 6.97 & 6.98 heavily caveat and undermine the projected numbers by limiting the decision to use these unnamed sites to Ministers, and acknowledging that 'potential to contribute towards the need for affordable homes, cannot be definitely known at this time.'

5.4 The unwillingness to clarify the location of such sites and designate them with certainty for Affordable Housing contradicts the Minister's intention for increasing supply of such housing.

'I am sure no-one is in any doubt that we should house every member of our community adequately, and provide more affordable homes for islanders'¹¹

5.5 Indeed, the lack of action and policy reform to verify such intentions is an ongoing concern that has previously been recognised and illustrated in an Inspectors' report to the Minister, in which it states the need to highlight three urgent points:

- There is a housing crisis in Jersey

¹¹ Statement from Chief Minister, Tuesday 16th April 2013

- There is a serious danger that States Members risk failing in their collective responsibility to deal with this crisis.
- Deferring the problem will do nothing to solve it and indeed will only make it worse.¹²

5.6 The review reiterates the urgency in which these points must be addressed by stating that it considers the housing situation in Jersey to be a 'crisis,' and suggest this to be an accurate portrayal of the situation for 'many in Jersey, particularly young people who are struggling to find acceptable accommodation.'¹³

5.7 It should be noted that this statement follows the Inspector's report regarding the (as then) Draft Jersey Island Plan 2011, which recommended the provision of 'reserve'¹⁴ allocated sites. This recommendation was made in mind of the view that:

'over-supply is an unlikely eventuality; and harm from a modest over-supply - making some houses difficult to sell - would in any event have fewer consequences than a shortage.'¹⁵

5.8 No such recommendation seems to have been included within the JIP Interim. A worrying decision when considering that the need for Affordable Housing has steadily increased for the last 25 years. This is illustrated by the need for past additional re-zoned sites being brought forward following past Island Plans: A trend that is suggested will be repeated when comparing the 23 acres from the 6 re-zoned sites allocated in the JIP Interim to the increased 46 acres from 13 sites allocated in the JIP 2002. The under-provision of allocated land is alarming when considering that 8 further sites (26 acres) were re-zoned in 2008 (a total of 72 acres within the Plan period 2002 - 2011).

5.9 It is also noted that the JIP Interim suggests that the redevelopment of outworn States of Jersey Housing Department Estates might result in a net loss of circa 300 dwellings. However, it is now estimated that during the plan period there is likely to be an increase in the total number of housing units delivered by the planned redevelopment and upgrading of these housing estates of an estimated increase of 400 homes to be provided. Whilst no detail has been provided as to the current design layout of the sites in question, no comment can be made as to whether the assumption of gaining 300 dwellings is viable. However, as previously stated, it is reasonable to suggest that where significant assumptions are made, a robust and credible evidence base be provided to justify such

¹² Report to the Minister for Planning and Environment, 2011, p.3.

¹³ ibid

¹⁴ The (Draft) Jersey Island Plan Inspectors' Report, p.53, para. 8.16

¹⁵ ibid

forecasts.

- 5.10 The town of St. Helier has been allocated to provide 1,200 additional dwellings within the Plan period. The evidence base informing this allocation is the Town Capacity Study, which was performed in 2007 and therefore outdated.

6. CONCLUSION

- 6.1 This report has identified concerns over the methods in which the JIP Interim has reached its projected forecasts. It is unclear whether up to date base population figures have been accurately implemented and that robust methods of data extraction have been used.
- 6.2 The evidence base produced by the Statistics Unit (FRFH addendum) seems to be relying on outdated sources. Moreover, various methodologies used for the population modeling are not clearly illustrated, with some methods such as the JASS relying on evidence not accurately representing Jersey's current population due to insufficient survey techniques.
- 6.3 It is reasonable to suggest that where the JIP interim seeks to propose housing delivery targets for the plan period, these should be founded upon a robust and credible evidence base. This is the foundation of the approach to developing statutory policy in the UK, a model template previously referred to within the FRFH 2007. Whilst the UK approach may be less than perfect, this does not reduce the reasonableness of the requirement that local development framework policies be informed by robust evidence base.
- 6.4 More clarification is also needed when illustrating the sources of supply. Heavy reliance upon the redevelopment of existing States owned stock to provide 400 extra homes needs to be explained. Indeed, the avoidance of specifying exactly which sites are to be allocated is worrying, as is the admission set out in paragraphs 6.97 & 6.98, that the potential contribution of such sites is not known
- 6.5 The failure to recognise the inspector's concerns (published in his report regard The (Draft) Jersey Island Plan)¹⁶ regarding the under-provision of affordable housing is worrying, as is the JIP Interim's disregard to implement the suggestion of having 'reserve' rezoned sites. Such a policy would be a logical provision when considering the past dependency on such a need and the likely underestimate of demand published in the JIP Interim.
- 6.6 In essence, the projected figures for household demand in both the JIP 2011 and subsequent JIP Interim are considered to be inadequate due to a lack of a clear and robust evidence base and outdated sources of data. As a consequence, the proposed land supply also falls short of accommodating such demand.

¹⁶ The (Draft) Jersey Island Plan Inspectors' Report, p.53, para. 8.16

7. GLOSSARY OF TERMS

“JIP 2011” - 2011 Island Plan

“JIP Interim” - 2011 Island Plan Interim Review

“SP” - States Strategic Plan 2009-2014

“PBL” - the Planning and Building (Jersey) Law 2002

“JPM” - Jersey Population Model

“JRP 2011” – 2011 Jersey's Resident Population

“JRP 2012” – 2012 Jersey's Resident Population