

9-21 Broad Street | St Helier
Jersey | JE2 4WE

Constable Mike Jackson
Chair, Environment, Housing and Infrastructure Panel
BY EMAIL

23 August 2021

Dear Mike

Re: Public Review Hearing: Affordable Housing: Supply and Delivery Review - Additional Questions

Please see response to the Panel's written questions following the public hearing on affordable housing.

- 1. In their response to the Draft Bridging Island Plan, Andium suggested the establishment of a Better Homes Task Force to focus attention on securing and bringing forward sites for new affordable homes. Do you favour this idea, and could it be developed into a dedicated team focused on site assembly and promotion?*

I am advised that Minister for Housing and Communities will establish and Chair a new Strategic Housing Partnership, bringing the full range of housing sector actors together with representatives from key government departments. This will provide the forum for discussion of housing issues, amongst other things, and will provide an opportunity for attention to be focused on the matter of site assembly and delivery.

I understand that the Minister for Housing and Communities is to be supported by a new Strategic Housing and Regeneration team which will provide the capacity and expertise to coordinate housing issues and delivery; in many respects that team – in working closely with a range of partners – will perform a similar function to those of the suggested Task Force.

- 2. Given the very stretched resources of the planning team and the need for additional support, would the production of Development Briefs for affordable housing sites be a good ring-fenced project which could be procured externally, and help ease pressure on planners?*

Supplementary planning guidance, including development briefs for affordable housing sites, is produced by the Place and Spatial Planning Team in the Strategic Policy, Planning and Performance directorate. This team is responsible for the development of all planning policy and guidance.

Development briefs for affordable housing sites will be prioritised following the approval of the new Island Plan, if approved, to enable the provision of affordable homes. The options for undertaking this work, relative to the resources and other priorities of the team, will be kept under review and subject entirely to available resources. There may be scope to commission certain briefs, or elements

of briefs, from external providers under the professional guidance of the Place and Spatial Planning Team.

3. *Would it help with the resourcing of the development management side of planning if applicants were expected to pay a fee for pre-application advice in exchange for an agreed service level?*

I am told this is currently being investigated as part of a general review of the services provided by the IHE Regulation directorate. Additional charges may require a change to the Planning and Building Law to provide the vires for levying a fee. I would not support these myself.

4. *Will the zoning of sites for exclusively affordable housing be controlled sufficiently to avoid land values inflating to near general residential market levels and how will this be achieved?*

The sale price of land is not a matter that can be regulated by the planning system but of course the Island Plan can provide landowners and developers with more certainty about the potential use of land through the establishment of a planning policy framework. The Island Plan, and supplementary planning guidance, can also identify potential constraints and obligations which are relevant to the development of specific sites. These factors will influence the value of land.

Sites zoned for affordable homes in the plan will be safeguarded for this purpose and subject to planning obligation agreements to regulate the tenure of homes and to ensure that they remain affordable – whether for purchase or rent – in perpetuity.

5. *Policy H6 in the Draft Bridging Island Plan addresses the provision of supported housing. Minister, can you expand on how, through this policy, the needs of those requiring supported housing will be met?*

The draft Island Plan provides a policy framework to enable and facilitate the provision of supported housing. Proposals that emerge during the plan period can be considered and supported relative to this explicit policy provision that is set out in the plan.

6. *There is no affordable housing recorded as having planning permission in the 5-year estimate of supply 2020 - 2025 in the Draft Bridging Island Plan.*

- a. *What actions could you, as Minister, take to improve this situation and promote an increase in consented plots for affordable homes?*

The draft Island Plan which sets out a clear strategy for the provision and delivery of affordable homes. The need to provide affordable homes was one of the key reasons underpinning the need to review the Island Plan at this time.

This is subject to the approval of the States which will provide a planning framework and a range of specifically allocated sites that will enable planning applications – and the award of planning permission - for the delivery of affordable homes.

At the end of 2020, approximately 600 affordable homes were under construction.

7. *There are a number of supporting documents mentioned in the Draft Bridging Island Plan, such as various supplementary planning guidance in relation to housing.*
- a. *Minister, how will you ensure that the relevant documents are in place in a timely manner to support delivery?*

Supplementary planning guidance is produced by the Place and Spatial Planning Team in the Strategic Policy, Planning and Performance directorate. This team is responsible for the development of planning policy and guidance. The options for undertaking this work, relative to the resources and other priorities of the team, will need to be kept under review to ensure the timely delivery of this work.

Preparatory work has, however, already been undertaken in relation to some of the supplementary planning guidance which requires review, and which will support the policy direction set out in the draft plan. It is my intention to publish some of this supplementary guidance – related to internal and external residential development standards; density standards; and parking standards – in parallel with the Island Plan Review process. This will be published in draft for consultation. Where it is consistent with the current Island Plan, and subject to the outcome of consultation, it may be adopted prior to the approval of the new Island Plan.

8. *There are no specific incentives within the planning process to bring forward affordable housing sites, for example fast-tracking where the schemes are fully compliant with policy.*
- a. *Minister, is this something that you have considered and how could it be implemented?*

Those sites specifically identified for the provision of affordable homes in the draft Island Plan have been submitted in response to a call for sites process that sought to establish that the indicated that land is available for development in the short-term.

Development briefs for affordable housing sites will be prepared by the Place and Spatial Planning Team, to identify potential constraints and infrastructure requirements, and this guidance should help to facilitate the preparation of development proposals.

Development proposals that have regard to, and meet, the requirements of development briefs, will progress through the planning process. The department's recent target operating model has also provided a new Senior Planner post for 'Special Projects', with this type of project in mind. It is uncertain whether this will be sufficient to meet the additional workload. At the moment, the SPS team is resource constrained

It remains important, however, that due process is followed and those with an interest in, or who are affected by development proposals, have an opportunity to consider proposals and to comment upon them.

- b. *Is there an opportunity to reduce planning contributions for affordable sites to make them more deliverable?*

Planning obligations associated with development will ensure affordable homes or otherwise - are required in order to make development acceptable in

planning terms. They ensure, for example, that the off-site costs of the development are borne by the developer rather than the taxpayer.

The nature of and requirement for planning obligations will be identified in development briefs.

9. *Minister, how will the Draft Bridging Island Plan ensure the parishes' have a strategic role in assisting with affordable housing delivery?*

I have engaged with the parishes throughout the preparation of the draft Island Plan to ensure that they have had an active role and contribution to planning to meet the need for affordable homes, both at a strategic and local level.

I greatly appreciated the support and effort of those parishes that have fully engaged in this process.

Once the new Island Plan is approved, I would encourage those parishes, where sites have been allocated for the provision of affordable homes, to work with landowners and parishioners to help ensure that development proposals for these sites are prepared that meet the community's needs and aspirations and help meet the island's strategic need for affordable homes.

10. *The Draft Bridging Island Plan refers to the inclusion of 'right-sizing' homes on sites zoned for affordable homes. Minister, does this imply that right-sizing homes will meet GoJ's definition of affordable housing?*

The Gateway currently manages access to affordable housing tenures including social rent, affordable purchase (managed by Andium under the Jersey HomeBuy scheme). I am advised that the Minister for Housing and Communities will update Gateway bands and relevant eligibility criteria include other housing categories including homes for key workers and 'right-sizers'.

A package of policies is required to enable right-sizing, and to encourage the release of existing family homes: planning policies, related to the use of land will need to work alongside housing policies relating to housing need and access. To assist in this process, this Island Plan supports and enables the provision of a proportion of right-sizing homes on sites zoned for the provision of affordable homes. Occupancy of any right-sizing homes would be regulated by planning condition, and eligibility to access any such provision would be restricted to those who are genuinely downsizing and managed through the Gateway.

There is a need in future for the Government of Jersey to Work more effectively with arms-lengths companies and housing providers to provide affordable housing, and to develop incentive and support packages to encourage under-occupiers to right-size to smaller homes; whilst developing appropriate mechanisms to ensure that the existing homes which are released are appropriate for, and remain available as, affordable homes for purchase in perpetuity.

11. *Based on information in the Objective Assessment of Housing Need and from recommendations in the Housing Policy Development Board report, Minister, do you support a review of GoJ's definition of affordability in housing terms and what do you think should drive an updated approach?*

I would support a review of the definition of affordability in housing and more policies to achieve them. The detailed definition of what constitutes affordable housing, and the criteria for eligibility and access to it, should be determined by the Minister for Housing and Communities and administered through the Affordable Housing Gateway.

12. Minister, are you or your official's members of the Regeneration Steering Group?

The membership of the Regeneration Steering Group (RSG) is established under the auspices of P.79/2009. I am not a member of the Group and have requested to be included. That has been declined.

Officers of SP3 attend RSG and are free to advise however as Minister I do not have that opportunity. In my view that is undemocratic. The role and membership of RSG needs to be reviewed urgently.

13. Minister, are you a member of the Creating Better Homes Political Oversight Group?

I do not know of this group.

14. Minister, are planners likely to be represented in the Strategic Housing Partnership?

The Strategic Housing Partnership seeks to bring together officers advising housing sectors.

Professional planners are represented in the Place and Spatial Planning (SPPP); Land and Regulation (IHE); and Jersey Property Holdings (IHE) teams, and will be involved in advising the partnership, as required. However, Development Control staff are not included. This is prevented by the conflicts of role inherent in the IHE TOM which I don't support and has to be reviewed

15. Minister, in your view, are there other mechanisms available for improving joint working between the planners and the new Strategic Housing and Regeneration Team?

I am advised that modest changes are proposed to form a new Strategic Housing and Regeneration (SHR) team to sit alongside the Place and Spatial Planning Team (who are responsible for planning policy) within the Strategy and Innovation Directorate of SPPP. The SHR team will need to have the capacity and expertise to coordinate housing issues and delivery. At the moment, I do not believe that this is the case, it is expected that it will also work very closely for Jersey Property Holdings (IHE).

In my view the current structure is unsatisfactory because of unresolved conflict of interest and does not make best use of available skills and needs to be reviewed urgently.

The fundamental need is for more and greater direct financial; intervention in the procurement of affordable housing development on privately owned brownfield sites, by their acquisition if necessary by compulsory purchase, and subsidising development's, absorbing high alternative use land value to ensure their viability for affordable homes in perpetuity.

I hope this letter is of some assistance and aids the Panel in their review.

Yours sincerely

A handwritten signature in blue ink that reads "John Young". The signature is written in a cursive style with a horizontal line underneath.

Deputy John Young
Minister for the Environment
D +44 (0)1534 440540
E j.young@gov.