

Affordable Housing : Supply and delivery – Scrutiny Review

Comments from the AJA – Contributions from Ian McDonald (Axis Mason), Mike Waddington, Colin Buesnel (Dyson Buesnel) 21st June 2021

1. How do you think Government can address the supply and affordability of homes?

- Promoting and incentivising modern methods of construction (modular, off-site etc), perhaps by offering developers/purchasers some kind of tax concession?
 - Being braver about scale and density in the built-up area and listening to more than just pressure groups. Scale and density have to sit alongside quality and amenity of course and the government, designers and developers have to promote and deliver better quality urban living to make it an attractive first choice and not just somewhere you live because it's all there is!
 - There are lots of positive lessons to be learned from the emerging Build-to-rent market in the UK and elsewhere – the Government could also promote this and incentivise BTR
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- By recognising there is an actual Housing Crisis, quantifying it across all departments and then making an action plan to resolve it.
 - By treating housing like infrastructure- if we need it we build it- as a priority
 - Of course, there are a multitude of Gov. policies to underpin this- 5 Strategic Priorities etc.

- Government can not address the supply and affordability of homes without a significant change in views.
- Decisions need to be made on a more strategic level.
- They can not influence build costs or material costs.
- The concept of downsizing / rightsizing is fundamentally flawed - why would someone living in a nice big house in the outer parishes, downsize to a 2bed flat on the upper floor of some faceless town flat development to free up a bigger property. The adoption of over 55 developments and single sized dwellings ie an estate of 3 bed houses is a fundamentally flawed strategy. Mixed size & tenure is the way to go.
- Offsetting up front costs is also not sustainable, leaves a legacy of debt.

2. Do you think the target delivery of 2,650 open market and 1,500 affordable homes before 2025, as outlined in the Draft Island Plan, is adequate and achievable?

- If the numbers don't take account of the shortfall not delivered under the last Island Plan then I don't see how it can be adequate?
 - Based on the numbers delivered or not delivered in the last 10 years, the target of 4,000+ in the next 4 years is highly ambitious and probably not achievable
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- Probably not. The current Island Plan has failed to deliver the targeted number of homes, so can't see this one being any different, particularly when considering my comments to item 1, above.
 - Its very likely to not be adequate, and most very likely it will not be delivered.

3. What key planning challenges and barriers to development, if any, have you identified and how might these be eased?

- The planning process is currently under severe pressure, underfunded, under-resourced and taking far too long. It's already a hugely expensive and uncertain process for developers and yet the service is simply not fit for purpose. In many cases, the planning submission fee is almost as much or more than the Stage 3 architectural fee - would any of our clients accept the same inadequate level of architectural service?
 - Even for consented schemes, the process of discharging conditions is inordinately time consuming, not properly resourced by the Department and hampering delivery of projects
 - There is no pre-app process to speak of – '16 weeks before we look at it' is not a service. How about charging a modest fee for formal pre-app (like the UK) and using this to fund a competent, objective planner who will provide reliable pre-app advice?
 - The third party appeal system is still far too inconsistent and the fact that the Minister remains the ultimate arbiter means that it remains a political process rather than a process about compliance with policy
 - The JAC consultation process is also not clear or consistent enough in my view. It's intended to be voluntary, but in reality it's not – we have been advised on several occasions that projects will go to the JAC whether we attend or not. It's intended to be independent and objective, yet JAC commissioners who have been directly involved in reviewing projects feel it is still appropriate for them to make direct representations to planning which must surely be a conflict of interest? And planning officers are completely inconsistent in their consideration and application of JAC comments – in some cases, they chose to ignore it whilst, in others, they will insist that a scheme is 'voluntarily' returned to the JAC time and again. This should be a much simpler and clearer process – 1 visit to the JAC and the planning officer then responsible for interpreting the advice and applying it in exactly the same way as any other consultation response. And maybe it's not voluntary?
 - There needs to be far more joined up thinking about sustainable transport and sustainable development in general. Perhaps the long overdue changes to housing standards and parking standards should be formally consulted upon and adopted before the DBIP is introduced?
 - If a community levy or other form of development tax is to be introduced, financial viability has to become a formal policy consideration. There is already well established precedent for this in the UK and the process must be fair, equitable and transparent. If developers cannot make a profit, they won't develop. If more development taxes are introduced, costs will rise or projects will not be viable
 - We need to be brave about St Helier and the Built-up Area in general. We need to protect the best of what remains from the past but not assume that a 19th century town can meet the needs of a much greater, more diverse and growing 21st century population. We need a planning system that encourages 21st century attitudes to sustainable land use and sustainable development, and that celebrates and encourages new kinds of urban living in the Built-up area. I think this has to mean denser, higher, greener and cleaner development in Town alongside high quality, car-free streets and open spaces
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- By requesting the Planning Minister heeds the independent advice of the Posi Report and champions a more positive and proactive Planning Department and process
 - By finding a mechanism to promote better design and associated robust consents. At the moment, particularly in the case of larger housing schemes, it feels like it is more of a box-stacking exercise with façade dressing. Stacking flats on top of each other and over-provision of expensive lifts. More imaginative solutions are needed.
 - By stalling the DBIP by 6 months and allowing meaningful community engagement, and a holistic review of the current housing crisis in the form of a public Housing Forum (again...was it 1998?) where the community, policy and decision makers all meet.

- This would reveal that policies are being rushed through without the public having any understanding of the associated unwritten SPG's- everyone is in the dark!
- And the updated Willie Miller UCA could be properly verified, as it is recommending height restrictions and numbers of storeys, but the storey heights are not stipulated, ie. commercial/residential/clinical? Also there is no urban analysis to back up the guidelines, eg TVIA's etc.
- The DBIP needs to be stress-tested in relation to the Construction Industry stealth taxes such as mandatory PFA, CILS, GHE Highways POA's, etc. Could these combined taxes reduce architectural quality, increase the cost of new homes or simply make schemes unviable and so reduce the much needed supply? Or all 3?
- The planing process needs to recognise, multiple occupancy dwellings ie extended family living (with their own separate kitchens etc), to take advantage of larger family homes and the existing built infrastructure.
- Many property's have the capability of meeting a significant housing need with a bit of lateral thinking.
- More mixed size & mixed tenure developments in the outer parishes.
- Additional provision for small scale retail / business in the outer parishes, in conjunction with mixed size & tenure dwellings.