



# National Trust Jersey

Patron: HRH The Prince of Wales

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Senator Steve Pallett  
Chair, Migration & Population Review Panel  
States Greffe: Scrutiny  
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Dear Senator Pallett

## **REVIEW OF P.116/2021 COMMON POPULATION POLICY**

Thank you for inviting us to make a submission on the Common Population Policy (**CPP**) lodged by the Council of Ministers on 10 December 2021. We are pleased to have the opportunity to do so given the importance that appropriate population policies have on so many of the environmental issues which are at the heart of the National Trust for Jersey's objectives. We would comment as follows:

### **Overarching aim**

We welcome the overarching aim of the CPP, as set out in the executive summary, to "progressively reduce Jersey's reliance on net inward migration within the currently agreed common strategic policy". We would, however, comment that this is not a new policy: the third strategic policy (out of 5) set out in the current Common Strategic Policy 2018-22 (r.11/2019) states that:

*"We will create a sustainable, vibrant economy and skilled local workforce for the future by delivering an economic framework to improve productivity, by nurturing and strengthening our financial services industry, by enhancing our international profile and promoting our Island identity, by delivering the best outcomes from Brexit, and by improving skills in the local workforce to reduce Jersey's reliance on inward migration"* (our italics).

It is perhaps surprising to see the length of time it has taken the government to develop a document setting out its position on such a high-profile policy given that this was one of the first and most important policies put forward by it.

## **The National Trust for Jersey**

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## **Accurate and timely data**

The executive summary sets out three specific areas where action must be taken to ensure that the population policy can be maintained in the long term, the first of which starts with the assertion that “previous governments have failed to collect accurate and timely data in order to effectively monitor the current position and adjust policies”. The executive summary goes on to state that “Given the current lack of robust data and the significant areas where action is needed to develop a coherent population policy, Ministers have concluded that it is premature to set any specific population target.”

Firstly, we would note that it is not just previous governments who have failed to do this: the current administration appears to have not done so either. It seems extraordinary that it has taken the current government over three years to identify such a fundamental issue without taking robust steps to implement procedures to collect the data effectively and accurately.

Secondly, we do not believe that this is a credible starting position for the government. With the extensive resources available to it, we find it hard to believe that a reasonably accurate estimate of historic and current population levels could not have been obtained from the various data sources available to it, including Social Security returns, tax return information, school registers etc. Whilst collating such information would require a degree of clerical effort, we do not accept that such data is not currently available within an acceptable degree of error. Furthermore, having undertaken a census in March 2021, we find it remarkable that at the very least a headline figure for population numbers was not available before the publication of the CPP in December 2021, some 8 months later. The census results may provide further evidential confirmation of a rumoured significant reduction in Jersey’s population during the Covid-19 pandemic, examples of which include labour shortages in the hospitality sector, difficulties in finding tradesmen in the construction sector and a reported significant drop in the number of tax returns filed in 2021.

Thirdly, we do not believe that the alleged lack of data is a reason to not develop a coherent population policy. We would agree that the lack of data means that the starting point for the policy may be to a degree uncertain, but the estimate which could be obtained from the existing data would be in a range which could be reasonably defined. The policy could assume such starting point, based upon the estimated data, which could be refined once more accurate data became available. We believe that the rationale given for the failure to develop a policy is fallacious.

## **Target date for achieving population stability**

The executive summary states that “The target date for achieving population stability will be set during the term of the next Council of Ministers”. Following on from the comments in the previous section about it having taken the government over 3 years to identify the data problem, it seems to us that the “can is being kicked down the road” for anything up to a further 4 years before an appropriate population policy is forthcoming.

We believe that this delay is unacceptable. Given that so much of the government's other policies depend upon the numbers of people living in the Island, we find the government's lack of focus on this issue to be remarkable. The executive summary's sets out the range of assumptions for future population growth used by different areas of government activity: +700 net inward migration used by the Fiscal Policy Panel up to +1,000 used as part of the outline business case for the Our Hospital project. Additional mention might have been made for the assumptions used in the draft Bridging Island Plan (**BIP**). By way of example, these include +800 used in the assessment of housing needs, and a range of between +800 and +1,500 used in the Arup Minerals, Waste and Water Strategy report to justify the expansion of the La Gigoulande quarry into Field MY966. There are huge impacts from using such inconsistent assumptions; in particular, there will be materially adverse effects on the environment and on infrastructure requirements if the BIP is adopted using such inconsistent and possibly inflated population growth figures.

The Objective Assessment of Housing Need (**OAHN**) report issued in January 2019 is much quoted and forms the framework for the housing needs set out in the BIP. However, one of the less quoted parts of the OAHN report states that its assessment excludes "any policy objectives and value judgements and evidence should be entirely about need and demand, to the exclusion of any supply-side factors such as physical constraints, policy designations and adverse impacts of development." It is clear, therefore, that a government population policy is one of a number of factors which could have a material impact on the Island's housing needs and hence many of the provisions of the BIP. In view of the likely timetable for the adoption of the BIP it is regrettable that no such policy is available before the BIP is considered by the States.

### **Wider issues**

The executive summary refers to a number of wider effects which need to be considered, and in particular the impacts of an ageing population including their health and social care needs, the need for action to be taken to improve education and skills and the need to support the productivity of existing businesses and developing new economic sectors. These are complex and interdependent issues, which need careful consideration, but they are urgent and need addressing as a priority. Appropriate population and control of migration policies are a crucial part of the solution to such issues, and so we would recommend that a far greater emphasis be placed on this than the procrastinatory approach adopted in the CPP.

Yours faithfully

For and on behalf of  
**The National Trust for Jersey**