



PCLeM/MAR/01.

19 November 2019

Connétable M. K. Jackson
Chairman
Environment, Housing and Infrastructure Scrutiny Panel
BY EMAIL

Dear Sir

Re: Minimum Standards for Rented Dwellings: Licensing Regulations – request for written submission.

Thank you for allowing us to comment on the draft regulations.

You may receive individual responses from members of the agricultural industry which are specific to their business but I shall generalize on behalf of most businesses.

Traditionally, the agricultural industry has housed the vast majority of its staff on their own holdings. Until the introduction of the minimum wage this accommodation was provided free of charge on the vast majority of holdings. When the minimum wage was introduced it was agreed by the States that farmers could levy an offset on accommodation provided to mitigate the immediate rise in the wage bill, that occurred. This puts agricultural accommodation in a slightly grey position.

I hope that your Panel can clarify the following :

Is agricultural accommodation going to need a license ?

If yes, will that mean that a typical new accommodation block of say, five units is charged for five applications and annual licenses or is this a 'hostel' block ? Where will the grower raise the fee? Will the offset be raised to cover this ?

Are Government aware that staff accommodation forms part of the independent audit that growers have to have, to receive Government support locally and to supply any of the major retailers ? As the new regulations are targeted at arm's length landlords, some of the details, should they be required for farmers are superfluous, e.g. contact address, telephone number etc.; we see these people every day!

A couple of other points, does a farmer who perhaps gives a key worker or longstanding employee free accommodation have to register ? Secondly, if the Scheme is going to cover all agricultural accommodation, should this not be at a discount as the vast majority of our accommodation has agricultural restrictions placed on it; it is not open market.

I am pleased to say that in recent years the standard of agricultural accommodation has improved greatly but obviously when much of it is for seasonal staff, used only for part of the year, it can be difficult to justify reaching the five star rating, so getting the discount. Another reason that makes this difficult and expensive for our industry.

On a more general note, I feel the whole Scheme is a bit expensive. Surely, a landlord's evidence that his property has been inspected by an electrician, heating engineer or similar would be a much more cost effective way to police the controls from year two onwards ?

Should any of these points need further clarity, I am happy to oblige.

Yours sincerely



PETER C. LE MAISTRE
PRESIDENT