

## Introduction

The Island Plan 2011 (Rev 2014) has shaped the economic, social, natural, and built environments for the previous decade. Whilst it has achieved many of its objectives, it has not been perfect, and the island has lost opportunities, buildings, and spaces because of these resulting in a detriment to the island.

With any Island Plan that defines and provides paths to development, there will be those who seek to profit from its guidelines, sadly often selfishly without regard to the impact on communities. This is often done by stretching policies of a plan and challenging the planning department's decisions with "the letter of the Island Plan", and not "the spirit".

It is a significant risk that a "bridging" three year plan will provide more opportunities for abuse of the system for selfish financial gains. I have no objection to such a bridging plan so long as

- It counters and protects the community even more-so than the previous plan
- It does not promote a level of development more than is required
- The definition of requirement is based on the most recent population policy created and enacted by the Government of Jersey.
- It promotes the diversification of the economy and supports "small industries"

## Defining Residential Development Levels without a new Population Policy

In absence of any new Population Policy by the Government of Jersey, it is my perspective that a "bridging" Island Plan **must use** the only previously published plan for net inward migration/population growth published and ratified by the Government.

The latest policy proposed a net +325 migration policy. The OAHN report created in November 2018 provided a household increase number for such a scenario.

Under no circumstance would it be fair, reasonable, or applying appropriate governance to assume that any greater figure is reasonable.

It is often quoted that 7000 homes will be required by 2030. This number is based on an assumed net migration of +1000. The entire OAHN focus on this figure is predicated by a single point;

*3.18 It is proposed that the OAHN is based on the +1,000 migration scenario. This allows for a continued net in-migration in line with recent trends and will help to maintain an economically active population to facilitate economic growth against a backdrop of an ageing population.*

This unqualified sentence is not sufficient for a government to base its housing policy and I can see no case in which it should be used in a "bridging" Island Plan.

## Protection of Employment and Agricultural Land

The current Island Plan has policies E1, ERE 1 and ERE 4 to protect employment land. The plan references these to support the objective of SP 5 – Diversification of the Economy.

Any bridging Island Plan must consider Land Use a key protected asset. As an entering agriculturalist and a local producer [REDACTED], I have struggled to find

appropriate agricultural and employment buildings and land for use. It is my firm intention to support the diversification of Jersey's economy through local authentic production. Most sites I find are mis-advertised with an attempt to placate these policies without an intention to find bona-fide use of employment land.

Whilst the above mentioned policies have aimed to protect such buildings for employment use, a bridging Island Plan must do more to secure these and prevent prospective developers from acquiring and converting these to residential developments at great "financial uplift", as this is preventing entire industries from contributing to the recognized aims of "Future Jersey" – to diversify and strengthen the economy.

A "bridging" Island Plan must consider that the existing exemptions to such policies – Office and Hospitality accommodation; is being used by developers to circumvent the intention of the plan, and this should be changed to safeguard land for employment and agricultural purposes.

On this case I have to disagree with the JFU's position on agricultural buildings. The conversion of these to "self-catering" is a significant loss to our heritage and is not a fair benefit to "bona-fide" agriculturalists. I would be happy to discuss with the JFU potential agricultural uses this existing stock could be used for.

Jersey's agricultural economy can grow into many sectors and I encourage any "bridging" Island plan to prevent the loss of **any** of these buildings without the demonstration of agricultural gain.

## **Conclusion**

My main concern in a "bridging" Island Plan is that it will provide opportunities for individuals and businesses to exploit the incredibly finite land of Jersey for financial gain, in turn sacrificing the community and holistic benefits of existing land uses the community benefits from.

The department has stated they are not in a position to create a 10 year plan, so I am trying to understand how a "bridging" plan can be brought forward with due process to close loopholes and detrimental development opportunities.

If a "bridging" Island Plan is brought forward, I ask it prioritises the conservation of existing land uses, further safeguards employment land, and prevents any development that a more invested long term plan would not think wise.

Jersey can take this time to "think and breathe". We cannot make assumptions on inward migration based on the trends (which have broken the previous policy to no apparent community merit). We need to invest in small industry, and crucially, we need any review process to allow the time to close any loopholes that may exist, without the action of lobbying groups whose aim is to self-benefit on "land-uplift" ahead of "community-uplift".

I am more than happy to appear as a witness to any scrutiny panel on this topic to contribute both as [REDACTED], and as a local business owner invested in diversification of the Island's economy.

[REDACTED]