



Policy & Resources Committee

Sir Charles Frossard House
La Charroterie
St Peter Port
GY1 1FH
+44 (0) 1481 717000
www.gov.gg

Presiding Officer
The Royal Court
St Peter Port
Guernsey
GY1 2PB

28th June 2022

Dear Sir

Letter of Comment – Requête P.2022/43 entitled ‘Additional Key Worker Housing’

I refer to the above requête which is scheduled for debate by the States of Deliberation on 13th July 2022.

Deputy Falla and six other Members of the States of Deliberation are seeking for the States:

1. To agree that there needs to be a significant increase in key worker housing in Guernsey.
2. To agree that, in respect of healthcare workers, key worker housing must include a variety of options at sites in the community to suit the full range of key employees.
3. To agree that in respect of any staff accommodation located next to the Princess Elizabeth Hospital the focus should be on brown field sites, including the possible redevelopment of the former Duchess of Kent House.
4. To agree that Agricultural Priority Areas should not be used by the States for staff accommodation unless there is demonstratively no alternative, and only then following a policy letter to the States seeking permission so to do.

The Committee is cognisant of the contentious nature of land use decisions and the views previously expressed by individual Members of the Assembly on this particular matter. By majority the Committee is opposed to the requête. However, it was felt that the divergent political positions amongst the Assembly would be most helpfully expressed in debate. At the same time, the Committee is of the view that the debate would benefit from further data relating to the matters raised, supplementing the information that is provided in the requête. This letter of comment and the approach to consultation are therefore centred on the facts required to facilitate an informed debate.

Context

Many Committees are impacted operationally by the pressure on the housing market and without doubt it is equally impacting both the community and the economy. As such, there is both political and community acknowledgment that the availability of suitable housing is the Island's most pressing domestic issue. The Policy & Resources Committee ("the Committee" / "P&RC") has consistently allocated additional resource to housing matters and continues to do so, including redeploying resource from other areas with the support of Principal Committees.

As part of the Government Work Plan ("GWP"), ten recovery actions were agreed in 2021 as being of primary importance in addressing the Plan's focus: 'Investing in Islanders, our Island and our Future'. One of those was to scope and deliver urgent measures necessary to address housing pressures, and progress has been made towards, in particular, the provision of increased Affordable Housing, the statutory definition of which includes key worker accommodation. The GWP 2022 debate has not yet concluded at the time of writing, but the policy letter proposes that actions to improve the availability and affordability of housing, including key worker housing, remain of utmost priority in 2022/2023.

Consultation

In accordance with Rule 28(2) of the Rules of Procedure, the Committee has consulted with all Committees it considers have a particular interest in the matters in the requête. It recognises that other Committees also have operational responsibility for service areas dependent on key workers, but these are not specifically addressed in the propositions of the requête and therefore they have not been consulted.

Under its responsibility for leadership and co-ordination of the work of the States, the Committee has sought, through the consultation process and this letter of comment, to bring together the relevant information and data held by Committees and provide a comprehensive picture of the strategic and policy context relevant to the matters raised in the requête.

The requête comprises three areas for consideration:

1. the need for additional key worker accommodation,
2. the requirement for accommodation for healthcare staff to be located on or near to the Princess Elizabeth Hospital ("PEH"), and
3. strategic land use planning - the potential for development within an Agriculture Priority Area.

The letter of comment has been structured accordingly, and the salient points raised by the consultation responses are presented within each section. These have engaged the mandates of various States' Committees, in particular the Committee *for* Employment & Social Security, Committee *for* Health & Social Care, Committee *for* Environment & Infrastructure, and the Development & Planning Authority, as well as

the Committee's own mandate with respect to States' property. The responses are appended in full to this letter (see Appendices A to D).

The Committee wishes to place on record that, as a requérant, Deputy Soulsby recused herself from all discussions relating to the Committee's consideration of the requête. The approach taken by the consultee Committees where individual Members are signatories to the requête is set out in their respective responses.

1. The need for additional key worker accommodation

The delivery of Affordable Housing, the statutory definition of which includes key worker housing, is a mandated responsibility of the Committee *for* Employment & Social Security ("CfESS"). A breakdown of the current key worker housing property stock is appended to the response from CfESS. At a high level this indicates:

- 144 units/rooms of dedicated key worker accommodation across 8 properties owned by the States;
- 25 units of accommodation owned or rented by parts of the States which are used by key workers;
- 47 units owned by the Guernsey Housing Association ("GHA");
- 89 units within 25 private market rental properties; and
- 66 rooms (some en-suite) in 3 hotels/lodging houses.

The Key Worker Accommodation Team has advised that whilst there is no States-agreed definition of a 'key worker' (something that will be addressed as part of the Key Worker Housing Project prioritised in the GWP), at present the Team predominantly seeks to house key workers in healthcare. The Committee *for* Health & Social Care ("CfHSC") is significantly impacted at an operational level by the availability of suitable accommodation. It is a key enabler to recruitment and retention and plays a particular role in attracting permanent staff, thereby impacting the level of reliance on agency staff for which there is competition with NHS Trusts and associated cost increases.

It is recognised that the operations of other Committees, such as the Committee *for* Home Affairs and the Committee *for* Education, Sport & Culture, are also impacted by the availability of suitable accommodation. Although not all of the Propositions relate exclusively to healthcare staff, the prayer focuses on the expedient delivery of housing for healthcare workers, and the specific location of any development of accommodation on or near the PEH site. Therefore, the consultation took a targeted approach in order to remain focused on the specific matters addressed by the requête.

The Committee, in its role as the States' employer, maintains data on the demand for key worker accommodation as part of its records relating to recruitment and retention. The data shows that the occupancy of key worker accommodation averaged 99.1% between January – April 2022. While the number of staff or prospective staff awaiting accommodation fluctuates, it is estimated that approximately 150 new units

of accommodation could be filled by healthcare workers immediately. It is understood that there is further demand for key worker accommodation for those currently living in privately rented properties which are either unsuitable or unaffordable.

The response from the CfHSC demonstrates that for a Band 5 (qualified) nurse, a private rental value of £1,500 per month represents 40% of their net income for the period where they are in receipt of Rent Allowance¹. Once Rent Allowance expires (after a maximum two-year period), this increases to 80% of their income. This influences the number of vacancies as well as the challenges of recruiting new staff. The Vice President of the Guernsey and Alderney Division of the British Medical Association (“BMA”) has written to Deputy Mahoney, in his capacity as political lead for States’ property and pointed to the impact on a wide range of roles. The letter (attached as Appendix E) indicates that many nurses, midwives and associated professionals leave Guernsey when their Rent Allowance expires. It further refers to several cases where Medical Consultants have left Guernsey in the past 3 years citing the high cost of accommodation in Guernsey (and the commensurate lower disposable income) as a major factor in their decision to leave. The BMA’s letter summarises that the provision of suitable accommodation is essential to maintaining the Island’s healthcare service.

CfHSC’s consultation response highlights that the number of vacant posts is returning to pre-pandemic levels, with 422 vacancies in the 12 months to May 2022 and a significantly increased annual turnover of 20.4% (414 leavers), compared with 295 leavers during May 2019-2020. In addition, CfHSC has recently had approval for a total of 38 new posts associated with prioritised GWP actions such as the Critical Care Unit expansion and orthopedic waiting list initiative, for which a dedicated recruitment campaign is due to commence. It is concerning that recruitment feedback indicates that candidates are not pursuing roles in Guernsey due to the challenges of finding suitable, affordable accommodation and that, where recruitment is undertaken via agencies, it appears that agencies are no longer referring applicants to CfHSC in the knowledge of those issues.

The demand for staff accommodation is directly impacted by the wider problems with the availability and affordability of properties in the local market, to rent or to buy. The response from CfHSC states that a survey carried out in 2020 showed that those who responded wished to live in family accommodation, own their own home, or participate in a partial ownership scheme, as well as having the option of living in key worker accommodation with private facilities (which is not currently the case for all key worker housing in Guernsey). If there was wider availability of suitable private sector accommodation that did not represent such a significant proportion of income,

¹ An employee who is appointed to the States of Guernsey (either on a permanent or contract basis) and is required to transfer their residence to the Bailiwick of Guernsey, will have certain relocation expenses met by the States of Guernsey, subject to certain conditions, as set out in this [Directive](#). This includes Rent Allowance, which is paid by the States of Guernsey to meet part of the cost of a private rented dwelling for a maximum of a two-year period. Where an employee will be residing in subsidised accommodation provided by the States of Guernsey, the Directive does not apply.

those survey results indicate that there may not be such high pressure on key worker accommodation. As part of the GWP, work is ongoing to address the availability and affordability of housing in the local market, and the 2022 update proposes that further priority is accorded to relevant housing workstreams in 2022/2023.

The response from the Development & Planning Authority (“D&PA” / “the Authority”) outlines that the current 2-year pipeline housing supply² (outline and full planning permissions where development is not yet complete) is 573 dwellings, of which 556 are private market housing and 17 dwellings are Affordable Housing, which includes key worker housing. In addition, planning applications are anticipated for two Housing Allocation sites which each have an approved Development Framework, where there is reasonable certainty of Affordable Housing being delivered as a proportion of the total development:

- Fontaine Vinery, developable area – Potential for 130 units in total,
- Kenilworth Vinery/Salt pans – Potential for 135 units in total.

The Committee has and continues to support the development of a range of Affordable Housing, including by facilitating significant land purchases where appropriate. The letter from CfESS challenges recent P&RC decisions to sell Beaucette Place and Sunnybrook, to which the Committee wishes to respond. In accordance with the Rules and Directives, officers from States Property Unit (“SPU”) opened a 2-week internal expressions of interest period during September 2021. The Housing Action Group (“HAG”) came forward with a proposal to use both properties for the provision of key worker housing; no other representations were made. The Committee was advised that both properties would have required substantial and extensive upgrading, and the initial view was that 6-8 units of accommodation could be delivered in Sunnybrook and 4 flats in Beaucette Place. The Committee took a view, considering the balance between delivery and capital receipt, that for those properties a capital receipt was more effective as it could then be used to fund more efficient sites (such as the purchase of Kenilworth Vinery or other similar sites) which would also be preferable from a long-term asset management perspective. In addition, it was considered likely that those particular properties would be purchased by small developers or homeowners for renovation or redevelopment which would represent an efficient use of the existing housing stock and/or potentially result in additional units in the private market.

2. Key worker accommodation located on or near the PEH campus

The States’ spatial strategy, as established in the Strategic Land Use Plan (“SLUP”), seeks to concentrate development such as housing within and around the edges of the two main centres, with some limited development within local centres, in order to support more sustainable communities and avoid the urbanisation of the countryside. The response from the Committee *for the* Environment & Infrastructure (“CfE&I”) signposts a number of Island Development Plan (“IDP”) policies which are relevant to

² IDP Quarterly Monitoring Report (QMR) for [Quarter 1 of 2022](#)

development Outside of the Centres³ which would be considered by the D&PA in assessing applications for development. The D&PA has clarified that key worker housing on or adjacent to the hospital campus would be considered ancillary to the hospital rather than new housing and that Policy OC2 is therefore relevant - Social and Community Facilities Outside of the Centres. This policy confirms at paragraph 16.2.1 that development proposals relating to large-scale strategic social and community facilities which have an island-wide relevance, such as the hospital and schools, will be assessed against Policy S5: Development of Strategic Importance⁴.

The *CftE&I* response states that although the existing accommodation at the PEH predates and does not conform with the spatial strategy, it does partially support one of the sustainability objectives in that it removes the need for those residents to travel off-site to work, reducing the number of likely car journeys. The disadvantage is that while residents are close to work, they are not as close to shops, services and activities as they would be within a centre.

The letter from the *CfHSC* indicates that most healthcare workers requesting accommodation do stipulate that they wish to be as close to their workplace as possible, which for a high proportion of staff will be the PEH. The letter from the BMA also suggests that a purpose-built development on the PEH site which provides housing for key workers for the term of their employment is essential. The *CfHSC* response indicates that where off-site accommodation is an option, a major consideration is the presence of good transport links and/or safe pedestrian movement between home and the workplace at all times of day, having regard for shift patterns. This is reiterated in correspondence from the Medical Specialist Group (“MSG”), which is attached in full as Appendix F. It is understood that in a highly competitive global market for nurses, it is essential that the available accommodation options are attractive to potential staff.

The *CfESS* response identifies that as well as the limited quantity, the limited range of accommodation type is problematic, as the circumstances of key workers naturally vary and as such they have differing requirements. In particular, the current stock has a very limited number of homes suitable for key workers looking to relocate to Guernsey with their family, noting that they are also less likely to prefer on-site accommodation. As set out in the *CfHSC* response, the waiting list for Beauville (the first purpose-built key worker accommodation for families, which is located in the Oberlands) has been closed for some time due to the limited number of properties and the length of the existing waiting list. The BMA’s letter supports the building of accommodation off the PEH campus to appeal to professionals who would move to Guernsey with their families to take up long-term employment.

³ Any areas not located within the Main Centres, Main Centre Outer Areas or Local Centres as designated in the [IDP](#).

⁴ Section 3.6 of the IDP.

P&RC has the mandated duty to advise the States and to develop and implement policies and programmes relating to, inter alia, the resources of the States including the States' property portfolio. This letter has appended to it information from the SPU pertaining to the process of identifying suitable sites for accommodation in the vicinity of the PEH, as well as considerations given to the impact of a potential early exit of the Duchess of Kent site in the context of property rationalisation and the Hospital Modernisation Programme. The following text provides an overview of the process and findings.

It is understood that while not all key workers would prefer accommodation located at the PEH, it appears to be the ideal for a significant majority, as supported by the correspondence from the BMA and the MSG. It was therefore recommended that a key factor in scoping this work was location on or close to the PEH, noting that a different set of criteria may produce a different outcome.

The SPU process considered property within a 1km radius of the PEH and identified 14 possible sites in either States of Guernsey or private ownership. 12 of those were on or within 0.5km of the PEH, and of those 7 were in States' ownership. These are identified in the two maps attached at Appendix G.

The sites were then scored against key criteria established by officers on behalf of CfHSC:

1. Construction of not less than 70 units (the equivalent of John Henry Court) and preferably circa 140 units.
2. On or very near to the PEH campus (within 1km).
3. Delivered immediately (circa 2-3 years, and not more than 5 years).

Options were also scored for their neighbour impact, cost, and environmental impact, the latter having regard for the brownfield or greenfield status of the land. The sites were then ranked based on their overall scores. However, sites which failed to satisfy any one of the three criteria established on behalf of CfHSC were deemed to not meet the essential criteria and consequently were not assigned a rank. The full scores and rankings are shown in the spreadsheet attached at Appendix G.

The field adjacent to the Duchess of Kent site, which is referred to in the prayer, scored highest and was ranked first out of the 14 sites. The Duchess of Kent site itself was not ranked because it did not meet the key criteria for delivery within five years (for reasons explored below), but it did otherwise score joint second with three other sites, as summarised in the following table:

Site (# on map)	Score (/30)	Rank	Comments*
DOK-PEH valley field (6)	25	1	Medium/high environmental impact, within Agriculture Priority Area, GF.
Vauquiedor valley (8)	22	2=	Bulk and massing constraints (70-100 units), high grade agricultural land, GF.
Field behind Chest & Heart clinic (3)	22	2=	Bulk and massing constraints (70-100 units), GF.
Duchess of Kent & Le Vauquiedor office (7)	22	N/A	Not ranked as failed to meet key criteria for delivery within 5 years, BF.
Oberlands car park (2)	22	N/A	Not ranked as failed to meet key criteria for delivery of at least 70 units, BF.
Field opposite Bulstrode House (5)	21	4	Medium/high environmental impact, within Agriculture Priority Area, estimated timeframe 4-5 years, GF.

* Greenfield = GF; Brownfield = BF

An initial high level 'order of magnitude' cost estimate has been undertaken internally by quantity surveyors to allow the assessment of the relative costs of the two options specifically mentioned in the requête (shaded in the table). A number of assumptions and exclusions were applied to the calculations, as detailed in Appendix G. In terms of provision, the options are based on 140 flats with one double bedroom, a shower and W/C, a kitchenette space, and a small lounge/dining area.

Option 1: The DOK-PEH valley field - £36 to £44m

based on two blocks of accommodation and 140 car parking spaces

Option 2: The Duchess of Kent site demolish and rebuild - £33 to 39m

based on one block of accommodation and 60 car parking spaces

The number of parking spaces has been used as a guide and may be reduced by the availability of alternative modes of transport, particularly if residents were mainly working at the PEH site. It is understood that the transport options for any sites being considered Outside of the Centres would need to accord with the States' Integrated Transport Strategy⁵.

The Duchess of Kent site comprises the Duchess of Kent House (the section to the rear) and Le Vauquiedor office which currently accommodate a range of administrative and front-facing service delivery teams (as detailed in the information appended from the SPU and the response of the Committee for Health & Social Care to Rule 14 questions posed by Deputy Inder⁶). If required, the earliest possible exit from the Duchess of Kent site would likely be 2+ years but this would incur significant costs and resource

⁵ <https://gov.gg/CHttpHandler.ashx?id=122742&p=0>

⁶ [Reply from the President of the Committee for Health & Social Care](#) to questions posed by Deputy Inder pursuant to Rule 14 of the Rules of Procedure, received 20th May 2022
<https://gov.gg/CHttpHandler.ashx?id=153687&p=0>

allocation which would have a detrimental impact on other workstreams and service delivery. A more realistic exit would be circa five years, subject to a number of other workstreams and detailed review of operational requirements.

The current uses of the Duchess of Kent House include specialist housing for former residents of Sunnybrook who are supported by a team of healthcare staff. The Committee understands that the building is likely to be required for that use until 2024, based on the construction schedule for the new purpose-built accommodation at La Vielle Plage, and early exit of these residents is not considered feasible due to the specialist nature of their requirements. There are currently no immediate plans or options to relocate other services from the Duchess of Kent House as they would be considered under the pipeline Principal Community Hub project and no other States' property has been identified as being suitable. SPU has advised that if there was a requirement to relocate sooner, it would be preferable to accelerate the Principle Community Hub from pipeline to a live project, but that would have considerable cost and resourcing implications which may require the States to deprioritise other capital investment. A more detailed assessment has not been made.

There are future plans to relocate up to 40 central staff from Le Vauquiedor Offices to other States' buildings. However, this is dependent on the ongoing review of the rotational working policies and the space available at Sir Charles Frossard House ("SCFH"), so it is likely any moves will not be possible until Q4 2022, subject to the space being available at SCFH. It is intended that vacant space achieved at Le Vauquiedor office will be used to decant teams out of the main hospital building to enable building works associated with the Hospital Modernisation Programme. Further requests have been received to accommodate other health & social care teams on the PEH campus and plans are currently being worked up to consider whether these requirements can all be accommodated. As a result, the Duchess of Kent site is expected to be required to deliver health & social care services for the duration of the Hospital Modernisation Programme (phase 2 estimated to be up until circa 2028) and potentially beyond, subject to the condition of the building.

Alternative options for relocating circa 100 staff not currently included in the property rationalisation programme have been considered at a high level. The Committee is advised that it is highly unlikely that there will be space within SCFH to accommodate these staff in the short or long-term, even with modern ways of working. Raymond Falla House has been considered but this is currently believed to be the best location for the Children and Family Hub, with staff relocating from Lukis House and Swissville (including Garden Hill), which are considered unsuitable for ongoing service provision, as well as the Reparative Care Team from the Duchess of Kent. Therefore, currently little detail has been developed on the potential options for the future use of the La Vauquiedor site at this time, with the best options for the site assessed if it became available.

Notwithstanding the significant operational implications of exiting the site early, the most likely solution would be a commercial rental which, subject to availability, would

incur costs of circa £250k per annum, as well as one-off costs associated with the move of approximately £750k.

If the DOK-PEH valley field was to be used for housing, both the Duchess of Kent site and the current States Dairy site have been identified as future possible development sites for the PEH. There may also be scope for limited other development around the PEH campus, but this would likely also be on existing fields, and the scale and mass of these developments would be limited due to the proximity to residential dwellings.

3. Strategic land use planning - potential development within an Agriculture Priority Area

The requête, in particular Propositions 3 and 4, relate to the potential for development on fields including those located within Agriculture Priority Areas (“APAs”).

The CftE&I has responsibility for advising the States on spatial planning, including the SLUP; general housing policy; and the protection and conservation of the natural environment, amongst other responsibilities. The response from CftE&I sets out that the SLUP recognises that agriculture has a multi-functional role, delivering not just food but other ‘public goods’ that have a considerable value for the local population, such as the protection and enhancement of the countryside.

The D&PA has advised that the SLUP requires a balance to be made between the protection of land for agriculture for the industry's current and future needs and recognising the role it plays in countryside management, with ensuring land is available to meet other legitimate development requirements. The APAs were established through the IDP as a designation of large areas of contiguous agricultural land, which offer greater efficiencies for farming and represent Guernsey’s most valuable agricultural land. However, the D&PA’s response explains that the APAs were broadly drawn and include land which could not be expected to contribute positively to commercial agriculture in the future, for example existing dwellings and their curtilages.

The preamble in the IDP to policies for Outside of the Centres states that the policies relating to the APAs allow for other forms of development where this would not unacceptably prejudice commercial agriculture (see Policy OC5(A): Agriculture Outside of the Centres – within the Agriculture Priority Areas). It continues that “these areas should not be regarded as being protected exclusively for agricultural use or development but as areas where regard should be given to the impact of any proposed development on agriculture when considering proposals for other forms of development. This provides support for the dairy industry while also allowing other legitimate development to take place”⁷. The IDP policy approach therefore allows for other forms of development in APAs provided that certain criteria are met and all other policies of the Plan are met.

⁷ Paragraph 15.1.10 of the [IDP](#)

The total area of land currently included in APAs is c. 15,802 vergées (6,400 acres). The map attached as Appendix H illustrates the designated APA land in the Island, shown in beige. However, the area within that which is currently suitable for agricultural use is approximately 8,378 vergées (3,393 acres). Preliminary estimates of the future requirement for land for commercial agriculture, to which APA land contributes, indicate a requirement for at least 15,385 vergées (c. 6,230 acres), increasing from the current 9,500 vergées (c. 3,848 acres). These early estimates reflect that there may be a requirement in the future to grow more fodder crops to allow the industry to become more self-sufficient and sustainable, along with a possible increase in demand for smallholdings.

The field referred to in the requête measures approximately 7 vergées (c. 2.7 acres) and forms part of the eastern edge of an APA which extends west to the proximity of Rocquaine, Perelle and Vazon (outlined in closer detail in the maps at Appendix H). As set out in the detail from the D&PA, the agricultural quality classification of the land is Grade 3b: Moderate quality land⁸. The top three grades of soil are known as Grades 1, 2 and 3, with grade 3 split into two subgrades. Grade 3b is subject to a moderate degree of limitation common to all Grade 3 land, but also is subject to physical disadvantages such as gradient, as is the case in respect of the PEH field, which restricts its flexibility and performance.

As set out in the CftE&I response, the Soil and Land Evaluation Report stresses that whatever its soil type or limitations on its use, all open agricultural land in Guernsey is valuable, and that its retention is important for the Island, particularly in the context of land scarcity, urbanisation, climate change and food security. With respect to the latter, it should be noted that no risk has been raised under the Bailiwick Risk Register regarding any disruption of the supply and distribution of food in Guernsey.

The CftE&I response indicates that the site is used for grazing and was classified as improved grassland in the 2018 Habitat Survey⁹, indicating a lower botanical diversity due to intensive agricultural management, and mentions the potential for remaining agricultural land to be farmed more intensively when APA land is subject to development. The CftE&I raises considerations not explicit in the IDP policies but related to that Committee's mandate, concerning the possible loss of habitats, light pollution, and the loss of the ecosystem services such as carbon sequestration, soil stabilisation and water and air filtration as a result of development within APAs. The response concludes that further evidenced comment on the environmental impacts of development on this particular site would require a more detailed review, such as that provided by an Environmental Impact Assessment.

Notwithstanding the flexibility in the IDP, the policies do not normally support new housing Outside of the Centres, with the exception of generally supporting the conversion of redundant structurally sound buildings and the subdivision of existing

⁸ Guernsey Agricultural Land Classification, 1989 [CHttpHandler.ashx \(gov.gg\)](http://www.gov.gg/CHttpHandler.ashx)

⁹ 2018 Habitat Survey [Habitat Survey - States of Guernsey \(gov.gg\)](http://www.gov.gg/Habitat-Survey-States-of-Guernsey)

dwellings, and there being the potential for development approved under Policy S5: Development of Strategic Importance¹⁰.

Deputy Mahoney, in his capacity as political lead for States' property, has previously enquired with the D&PA about the potential for the Authority to consider a development application for the field adjacent to the Duchess of Kent House under Policy S5. A copy of the D&PA's reply is appended to the Authority's consultation response. Together, the correspondence clarifies that the provision of key worker housing for health workers on or adjacent to the PEH campus would not be considered new housing and would instead be considered ancillary to and part of the hospital use. As such, proposals for development of that nature could be considered under Policy S5 as a development of strategic importance. Policy S5 requires only that development is clearly demonstrated to be in the interest of the health, or wellbeing, or safety, or security of the community, or otherwise in the public interest; that there is no alternative more suitable site available; and that the proposals accord with the Principle Aim and relevant Plan Objectives. All other policies and policy requirements, including those relating to APA, are set aside if Policy S5 is invoked.

The D&PA's consultation response sets out that, in considering proposals under Policy S5, the Authority must be satisfied that the particular choice of location for a proposed development can be clearly justified and that the proposals represent the best practicable option. For this reason, a detailed and comprehensive site selection study would be expected as part of the submission of a planning application, as would measures to mitigate any harmful effects on the environment and opportunities for environmental enhancement. The work previously undertaken by the SPU in respect of site selection would inform that work, noting that the outcome of the assessment reflects the nature of the key criteria.

The D&PA has the duty to advise the States on land use policy, and to maintain and keep under review schemes of delegation in order that only the most contentious or high profile applications are referred to the elected members of the Authority, and that where they are so referred that they are heard at open planning meetings. If proposals for development on the field in question were submitted, it is understood that such a referral would likely be made. The D&PA's consultation response sets out the Authority's concern regarding Proposition 4 and in particular its impact on the D&PA's ability to carry out its statutory duties. The P&RC has sought clarification from the Law Officers of the Crown and is advised that while the States are able to agree what is proposed in Proposition 4 as a matter of operational policy, any decision to that effect could not operate so as to constrain the D&PA from carrying out its duties as required under the relevant legislation. A departure from the established statutory process would require a legislative amendment or change in land use policy made in accordance with the relevant statutory procedures.

¹⁰ Section 3.6 of the IDP

The P&RC also has a duty to advise the States on the implications of proposals and whether they accord with States' policy plans. There is both political and community acknowledgment that housing is currently the Island's main domestic priority. At the time of writing, the GWP 2022 debate has not yet concluded, but the policy letter proposes that work to address key worker housing capacity and affordability (as well as other actions relating to housing) continue to receive utmost priority in 2022/2023. Although the policy objective set out in Proposition 4 does not appear inconsistent with the direction of the SLUP, in the current strategic context it could be considered anomalous that Proposition 4 would potentially establish a higher threshold for the development of key worker housing through the States than for development of other types by any applicant, which would apply to all areas of APA in the Island.

Summary

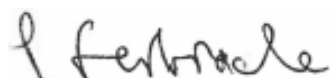
As the availability of housing is the Island's most pressing domestic issue and acknowledging the resultant impact on the ability of Committees to deliver essential services, there is a significant requirement for additional key worker accommodation in both the short and long-term. The Committee will continue to support the most appropriate solutions through the allocation of resources, development and coordination of policy, and management of the States' property portfolio.

It is understood that accommodation on the PEH site is the preference for most, although not all, potential healthcare recruits. In the context of such significant challenges with recruitment and turnover owing to the lack of supply of suitable, affordable accommodation, there is a case for prioritising the most expedient solutions which meet the needs of the majority.

The Committee recognises that land use decisions can be contentious and that although such decisions are guided by planning policy, where development is proposed on greenfield sites there are likely to be strongly held individual views. Although by majority the Committee opposes the requête, it is intended that this letter of comment and appended responses provide, as far as possible, objective data and fact to facilitate an informed and comprehensive debate of the issues raised in the requête.

The Committee wishes to thank the Committees of the States for the information they have provided to that end.

Yours faithfully



P T R Ferbrache
President

Enclosed:

Appendix A: Letter from the Committee *for* Employment & Social Security (with appendix)

Appendix B: Letter from the Committee *for* Health & Social Care (with appendix)

Appendix C: Letter from the Development & Planning Authority (with appendix)

Appendix D: Letter from the Committee *for the* Environment & Infrastructure

Appendix E: Letter from the Vice President of the Guernsey and Alderney Division of the British Medical Association, dated 18th March 2022

Appendix F: Email from the Chairman of the Medical Specialist Group, dated 31st May 2022

Appendix G: Information from States' Property Services

- 1) Site selection detail
- 2) 2 x maps (Digimap and IDP) showing sites considered
- 3) Site scoring matrix

Appendix H: Digimap images showing designated APA land

- 1) 1:64,000
- 2) 1:32,000
- 3) 1:8,000



Edward T. Wheadon House
Le Truchot, St. Peter Port
Guernsey, GY1 3WH
+44 (0) 1481 222500
employmentandsocialsecurity@gov.gg
www.gov.gg

Deputy P T R Ferbrache
President
Policy & Resources Committee
Sir Charles Frossard House
St Peter Port
GY1 1FH

Date: 16 June 2022

By email

Dear Deputy Ferbrache

Requête – P.2022/43 entitled ‘Additional Key Worker Housing’

Thank you for consulting with the Committee *for* Employment & Social Security (‘the Committee’) on the above referenced Requête. While this letter provides supporting information in relation to the key worker housing requirements on Guernsey, I want to confirm from the outset that the Committee unanimously supports all the propositions contained within the Requête.

The Committee has mandated responsibility for the delivery of ‘affordable housing’ which, as set out in legislation, includes the delivery of key worker housing. Therefore, the Committee’s comments are focused on the two areas of the Requête – the requirement for key worker housing in Guernsey and the delivery and location of key worker housing provision.

The Committee firmly believes that there is an acute need for additional key worker housing in Guernsey if the Island’s essential services are to be delivered. This can be evidenced by the recruitment issues faced by key worker employing committees but also by the placement issues faced on a daily basis by the Key Worker Accommodation Team located under the responsibility of the Committee *for* Employment & Social Security.

The Key Worker Accommodation Team continually reports a lack of properties to house recruited key workers. They are in a truly desperate position and have been running at, or near to, capacity for the majority of 2021/2022. There are simply not enough suitable properties, in terms of numbers, size, standard and affordability, available to house health key workers, let alone key workers recruited by other committees. Increasing the number, and suitability, of key worker housing in Guernsey is vital if service delivery is to be enhanced or even maintained.

While there is no States-agreed definition of a ‘key worker’ (something that will be focused on as part of the Key Worker Housing Project prioritised within the Government Work Plan), at present the Key Worker Accommodation Team predominantly seeks to house health key

workers, together with some agency teachers; the Committee believes that these are by no means the only key workers who should be eligible for key worker housing but the critical lack of supply of either States or Guernsey Housing Association (GHA) owned key worker housing units, as well as restricted supply in the private rental market, means that it is almost impossible to broaden the provision of housing to key workers in other service areas at present under the current arrangements. The Committee wants to emphasise that the figures quoted below are only part of the picture. Should a definition of 'key worker' be agreed and implemented, and the housing requirements in response taken into account, the Committee believes that it is extremely likely that more key workers would be eligible for key worker housing and therefore the headline housing requirements for this tenure will increase.

At present, estimates are that there will be a need for an additional 100 – 150 health key worker units over the next 2-3 years. In addition to this, there is a need to provide more suitable, self-contained, accommodation for a number of key workers currently living in sub-standard properties. To further expand on this point, a number of existing housing units used for key workers are of poor quality and in need of substantial upgrading to meet current standards. For example, they are extremely outdated (and so unattractive to key workers, which can hinder the recruitment process) and many require housemates to share bathrooms, which is not ideal ordinarily but has become even more unacceptable since the Covid-19 pandemic and subsequent requirements to isolate. While key workers are often attracted to shared living arrangements due to shared rental costs, the living conditions must still be of a suitable standard. As such, a number of current key worker housing properties need to be either substantially refurbished, redeveloped or sold (if proven to be unsuitable) so that new units of accommodation can be developed in their place that are both attractive and affordable to new recruits.

Another issue with the key worker properties that the Committee feels must be addressed is the limited range of accommodation options available. The circumstances of key workers vary like other members of society and, as such, a variety of types of units and unit sizes need to be catered for. In particular, the current key worker housing stock is severely lacking in suitable family accommodation. If a key worker is looking to relocate their family to Guernsey, a suitable property needs to be available to meet the family's needs, with the most desirable being houses, rather than apartments, due to the demand for outdoor space. The waiting lists for family properties are ever increasing and there is a real unmet demand for this type of accommodation. As such, the Key Worker Accommodation Team has had to close the waiting list for some family accommodation types because, at present, the demand for a suitable family property is almost impossible to meet. It is no longer acceptable to assume that key workers relocating will be single, or remain single, and a wider demographic should not be put off applying for key worker roles in Guernsey due to the limited choice of accommodation options available.

In addition to the need for various property sizes and types, there is a need for key worker housing in various locations across the Island. While locating units of key worker accommodation on the hospital campus benefits some key workers, evidence provided by the Key Worker Accommodation Team suggests that some key workers they have tried to house strongly prefer to have distance between their place of work and home. This is particularly true for key workers relocating with their families. It is also important to emphasise that not all health key workers work on the hospital campus. Specialised housing facilities (such as the

new Le Vieux Jardin Autism Hub located in the Vale) also employ off-island key workers and the strong preference for these key workers is for housing located near that facility, or at least on a good transport network route for it, not necessarily on the hospital campus. As more specialised housing facilities are redeveloped, the spread of health key workers across the Island will inevitably remain varied. Therefore, for the above reasons, the Committee believes there is a strong argument for a range of site options across the Island to be pursued for key worker housing, not just restricted to proximity to the hospital campus.

The above factors all need to be taken into account in progressing the components of the affordable housing development programme. However, new developments to address the need should not be the only focus. The current provision of key worker housing is through a mix of GHA properties, States-owned properties and private rental properties. The enclosed document provides a breakdown of current key worker housing providers in Guernsey and shows that 155 units of accommodation across 28 properties are provided for by the private rental sector. The Committee considers this to be a severe vulnerability in housing provision, which has been evidenced in recent years by the volatility of the local housing market and the impact that escalating rental prices and restrictions in this market have had on the availability of accommodation for key workers. The Committee firmly believes there are strong benefits to a higher proportion of States or Association owned key worker accommodation that could provide a much stronger level of certainty for future provision. In addition, a reduced reliance on the private rental sector would free up these units for other private market tenants, therefore impacting positively on supply in the Island's private housing market.

While not an exhaustive list of the key worker housing 'issues' facing Guernsey, the above demonstrates that there is a real and pressing need for additional units of a variety of property types, sizes and locations to be developed by either the States of Guernsey or the GHA so that housing limitations are not the reason for key workers not being successfully recruited and retained in Guernsey. This is an essential component of the wider affordable housing development programme for the Island and has been factored into the planning of pending development and redevelopment sites. While real progress has been made in acquiring sites to progress the development programme, the numbers of units needed to meet the requirement for social rental, partial ownership, key worker and specialised housing is in excess of the potential unit yield for these confirmed sites.

Specifically in relation to key worker housing, it remains an area that has lacked investment and development progress in recent years. This has led to the severe shortage of suitable accommodation being experienced now. Providing units for key workers is now at the forefront of the affordable housing development programme and in the last year over 40 sites have been considered for development, with 12 being actively pursued (for reasons of commercial sensitivity, these sites cannot all be publicised at this stage). The tenure of units on secured development sites, and any pending sites, need to be considered collectively to ensure an appropriate mix of tenures is provided to best meet the Island's overall affordable housing requirements. Therefore, at this stage, it is impossible to confirm exactly how many key worker units will be developed on these pending sites.

In pursuing this clear objective of the affordable housing development programme, the Committee was disappointed at the lack of support it has been given by some Committees. At present, the acquisition of land to develop affordable housing is a key focus of the Committee

as well as the former Housing Action Group. There are a number of States-owned sites that the Committee considers to be ideal for the development of key worker housing but, for various reasons beyond the control of the Committee, have either been sold on the private market or not progressed. Beaucette Place and Sunnybrook are two prime examples of the former. An indicative development proposal was undertaken for these States-owned sites that showed that five self-contained flats could have been developed on the Beaucette Place site and eight large en-suite bedrooms on the Sunnybrook site. These units would have provided a valuable addition to the Island's key worker housing stock both in terms of number, location and scale of the sites, which the Key Worker Accommodation Team confirmed would have all been highly sought after, and quickly taken up, by key workers. The sites also would have seen units completed much sooner than the pending larger sites that require more complex planning permission. Despite evidence and requests from the Committee, the Policy & Resources Committee progressed with the sale of these properties to the detriment of the affordable housing development programme. The Committee considers this to have been a valuable opportunity missed.

In relation to States-owned sites that have not been progressed, the Duchess of Kent is a prime example. The site is a perfect location for health key worker housing with initial sketch designs showing that in the region of 120 units of John Henry Court style accommodation could be developed in a phased approach on this site (this figure is only indicative and would vary depending on the scale of development and the developed property types and sizes). The positive impact this could have on meeting the future key worker housing requirements is unquestionable and the Committee feels strongly that this development should be further considered. Instead, the Committee was disappointed and frustrated to learn that instead of pursuing this site, an adjacent Agricultural Priority Area site was being focused on. Notwithstanding the acute need for key worker housing, the Committee feels that the wider environmental impact of developments must not be overlooked when seeking potential sites. As such, the Committee is vehemently opposed to progressing plans to develop an Agricultural Priority Area, in particular when there is a far more suitable alternative adjacent to it on already developed land.

However, if the Duchess of Kent site does not prove a viable key worker housing development option then there are undoubtedly other sites across the Island (both within close proximity to the hospital campus and further away so as to cater for all key worker preferences) that could be fully scoped before resorting to developing an Agricultural Priority Area site. The Committee is adamant that the latter should only be pursued once all other options have been exhausted, a position it does not feel has been reached.

Increased housing requirements on the Island are unfortunately inevitable and irreversible for the medium term, but what is within the control of government is the location of the development sites to meet this requirement. Decision-making in this complex area must have all options fully analysed so that any development is right for key workers and for the Island as a whole. The Committee considers it irresponsible that greenfield sites are being considered for development before all other alternatives have been fully analysed and it strongly supports the motion of the Requête.

For the above reasons, the Committee fully supports the propositions of the Requête and requests that this response be appended to the Requête for circulation to aid the debate.

Yours sincerely

A handwritten signature in black ink, appearing to read 'P. Roffey', with a stylized flourish at the end.

Deputy Peter Roffey
President

Current Key Worker Housing Property Stock as at 10.06.22

Property Owners	Property Stock	Lettable Units / Rooms
States of Guernsey dedicated key worker accommodation	8 properties comprising: <ul style="list-style-type: none"> • 1 x 3 unit property (3 non en-suite rooms) • 1 x 30 en-suite room property • 1 x 66 unit property (24 x 1 bed flats & 42 x bedsits) • 1 x 11 unit property (mix of shared bathroom and en-suite rooms) • 1 x 4 unit property (2 x 1 bed bedsits and 1 x 2 bed flat) • 1 x 9 unit property (1 x 2 bed flat, 1 x 3 bed flat, 4 x 1 bed flats) • 1 x 13 unit property (2 x 2 bed flats, 1 x 2 bed bungalow, 1 x bedsit, 6 x rooms shared facilities) • 1 x 8 unit property (8 non en-suite rooms) 	144
SPS rented accommodation used by key workers	4 x 1 bed flats 1 x 3 bed flat 2 x 2 bed houses (used as family accommodation)	11
Housing-owned accommodation used by key workers	3 x 3 bed maisonettes 1 x 3 bed house	12
Education-owned accommodation	2 x 1 bed flats	2
Guernsey Housing Association	13 x single staff accommodation units 18 x 1 bed accommodation apartments 6 x 3 bed houses family accommodation 8 x 2 bed family accommodation apartments 2 x 2 bed family accommodation houses	47

Private Rental Market Properties	25 properties comprising: <ul style="list-style-type: none"> • 3 x 1 bed flats • 10 x 2 bed flats • 1 x 2 bed house • 1 x 3 bed flat • 3 x 3 bed house • 2 x 4 bed house • 1 x 6 bed house • 2 x 7 bed houses • 1 x 10 bed property • 1 x 14 bed property (3 x 2 bed flats, 1 x 1 bed flat, 7 bedsits) 	89
Hotels / Lodging Houses	3 properties comprising a mix of en-suite and non en-suite rooms	66



Committee *for*
Health & Social Care

Le Vauquiedor Office
Rue Mignot
St Andrew
Guernsey
GY6 8TW
+44 (1481) 725241
www.gov.gg

Deputy P Ferbrache
President
Policy & Resources Committee
Sir Charles Frossard House
La Charroterie
St Peter Port
Guernsey, GY1 1FH

17th June 2022

Dear Deputy Ferbrache

Requête – P.2022/43 entitled ‘Additional Key Worker Housing’

Thank you for your letter dated 27th May 2022 and for providing the Committee *for* Health & Social Care (“the Committee”) with the opportunity to provide relevant supporting information for the debate on the ‘Additional Key Worker Housing’ Requête. Please note that Deputy Bury has not taken part in the Committees discussions on this subject.

While the Committee does not have any mandated responsibilities in respect of property related matters or specifically in relation to the provision of Key Worker accommodation, it certainly has a strong interest in this area and notes that the Requête refers to sites utilised by HSC and to the provision of accommodation for health and care workers. The ability of HSC to offer its core operational services very much depends on the success of efforts to recruit and retain staff and we recognise that the availability of sufficient key worker housing to meet a range of needs is an important part of those efforts.

Pressures in this area have increased significantly over the last 12-18 months and this is impacting on service delivery. In the context of an extremely competitive market for health and care staff, it is the experience of our professional recruitment team, that recruitment agencies used by HSC to source permanent staff identify that they are no longer referring applicants to us, in the knowledge that we will not be able to offer suitable accommodation should a candidate be successful. This is further reinforced by the experience of our staff and other prospective staff, who are struggling to find suitable accommodation. This is a

wholly unsustainable position if HSC is to continue to offer the range of services that are currently available on-Island.

As you have noted, the recent response provided to the Rule 14 questions posed by Deputy Inder, which is appended, does address some of the points raised in your letter. However, in addition, the Committee is pleased to provide a detailed summary of HSC's need for key worker accommodation and current waiting list data (Appendix 2).

The Requête calls to look at the Duchess of Kent buildings as a possible site for new accommodation. The Committee by a majority considers that the Duchess of Kent provides an ongoing useful asset to the provision of services by HSC. It would be a waste of resources to demolish, let alone the extra time scale in demolishing and rebuilding. Further information about the Duchess of Kent buildings is also provided in the Rule 14 responses to Deputy Inder.

In summary, HSC is very much supportive of a significant number of units being provided on campus for key worker accommodation, which although will not solve all of our accommodation needs, it would be a great step forward to the provision of health and social care on the Island.

The Committee notes that, as indicated in your letter, it is the intention for the Policy & Resources Committee to circulate this correspondence to all States Members ahead of the debate on the Requête.

I trust that this letter and the appendices are useful. Should anything further be required, please do get in touch.

Yours sincerely,

A handwritten signature in black ink, appearing to be 'Al Brouard', with a long, sweeping horizontal line extending to the right.

Deputy Al Brouard
President

**REPLY BY THE PRESIDENT OF
THE COMMITTEE FOR HEALTH & SOCIAL CARE
TO QUESTIONS POSED BY DEPUTY INDER PURSUANT TO RULE 14 OF THE
RULES OF PROCEDURE**

The Committee wishes to state that the positions outlined below are by a majority in some instances.

1. How many HSC staff/patients/residents either work or are accommodated at the Duchess of Kent (DoK)?

There are in the region of 110-120 members of HSC staff that regularly use Le Vauquiedor Offices at present. This includes: Corporate Services; Finance; HR; the Off-Island and Client Teams; Data Quality; Public Health Services; Quality and Safety, and Procurement. The States of Guernsey Occupational Health Service is also based in the building. It is expected that this number will marginally increase over the next few months with the addition of a small team associated with the ongoing COVID-19 vaccination programme and to provide office space for some members of staff working on transformation projects. There is a further requirement for decant space from the PEH buildings to enable the modernisation project.

In addition to the above, there are six permanent residents in 'Sunnybrook' who are supported by a team of 24.7 whole time equivalent (WTE) staff providing 24/7 care to those individuals.

The building provides a flexible space which can be used in decants, short term requirements or emergencies across the organisation.

2. Should HSC identify the DoK site for accommodation where would the staff/residents/patients move?

New build accommodation will be available to the residents of Sunnybrook and this is currently expected to be completed in 2024, subject to external factors.

It is not anticipated that the Duchess of Kent site will be vacated and demolished to make way for accommodation. This would be a waste of a current resource; it is a substantial building which remains integral to the HSC operation.

It is anticipated that staff delivering corporate services, such as Finance and HR, may move to other office accommodation in the States of Guernsey and/or work in a hybrid way with some time spent working from home. Other staff also currently work in a hybrid way. As noted above there are other requirements for this office space to enable other programmes such as the modernisation project.

3. The President has stated that the Committee's preference is for nursing staff to live closer to the Princess Elizabeth Hospital (PEH). Could he explain the advantages of accommodation built on/near the PEH site?

The majority of those who request staff accommodation ask to be as close to their place of work as possible, particularly those without transport or who hold positions that require them to be on-call. There are advantages for members of staff in seeking to reduce their expenditure while on-Island and there can also be benefits to the operation of the PEH, should there be an emergency or a need for additional hours to be worked. John Henry Court, which is on the PEH campus, is a popular option for permanent and agency staff coming to the Island to work and units are quickly filled when they become vacant. There is a waiting list for both the flats and the bedsits.

4. When will the Committee be making the decision for the preferred accommodation site?

The Committee has been exploring a number of options for the provision of key worker accommodation on the PEH campus, and on other sites, with the support of the States Property Unit, the Housing Action Group and the Policy & Resources Committee. This has included considering opportunities to use other States-owned sites to provide for key worker housing and to also identify opportunities for shorter-term rental options that can help to fill a gap in the need for accommodation while other longer-term solutions are explored.

The Committee *for* Health & Social Care will require the support of other States' bodies before it is able to determine how to proceed, noting that this is outside of the Committee's mandate. For example, it is the Policy & Resources Committee that has made a request to the Development & Planning Authority for guidance about whether the land on the PEH campus may be released now for development. It will be necessary to reconsider next steps in light of this feedback in due course.

5. What is the process and the timelines for decision, design, planning application and delivery of the new accommodation block?

Some very high-level initial work has been completed in respect of a possible development opportunity, as we rent and own a smorgasbord of accommodation, much of which can be released back into the marketplace once we have further purpose built accommodation on the PEH campus as above, but as with any such development, detailed architectural design would be required and there are planning processes that would need to be followed. Therefore, while this aspect is outside of the Committee's mandate, it is understood that it would not be unreasonable to expect that (subject to the interim feedback from the DPA) reaching the stage of obtaining planning permission could reasonably take around 18 months. This timescale is dependent on many different factors. We would of course hope to drive this figure down once a decision to proceed is made.

6. How many units is the Committee considering for a new accommodation block?

This will be subject to detailed design work to meet the various planning considerations and also to ensure that the accommodation meets the needs of key workers. A high-level estimate is that this site could deliver in the region of 128 1-bed, self-contained units of accommodation (possibly more), but this will be subject to a further detailed assessment of need and format and will be determined in part by other considerations such as planning and building control.

7. How many units would be released from the private sector once a new accommodation block is built?

This is challenging to estimate because there is pent up demand for key worker housing, and we would anticipate that some of the units would go to new staff as a result. However, it would not be unreasonable to suggest that a fair proportion of the units provided for key worker accommodation would offer the potential to release private rental sector housing, thereby easing the demand in that sector.

8. Given that concrete equates to something like 7% of the world's carbon output would the Committee agree that the refurbishment of the build would make more environmental sense?

It would be logical to suggest that repurposing an existing building such as Le Vauquiedor Offices/Duchess of Kent building would have a reduced environmental impact, by reusing some of the infrastructure which is already in place and by minimising waste. There are many factors when determining environmental factors and impact. Buildings have long life space however, consideration should be given to determining the whole life cost and environmental impacts.

As mentioned above, the Duchess of Kent/Le Vauquiedor building provides a flexible space which can be used in decants, to meet any short-term requirements or emergencies across the organisation, as it is close to but separate from the main hospital infrastructure.

APPENDIX 2: The Need for Keyworker Accommodation in Health & Social Care

The States of Guernsey employs keyworkers in a number of areas, primarily in Health and Social Care (HSC), Education and within Law Enforcement. Recruitment is becoming more challenging because of the lack of available affordable accommodation to either rent or buy and this is impacting the ability of the States of Guernsey to recruit sufficient numbers of staff. HSC in particular is trying to attract staff from a limited pool of resources in a very competitive market with many jurisdictions struggling to recruit and retain staff.

Background

The States has provided staff accommodation for Registered (Qualified) Nurses for many years as historically that was the only way that nursing staff could be legally housed. Under the old Housing Control Law nurses were initially not eligible for Housing Licences and could therefore only occupy accommodation owned or rented by the States of Guernsey under a "Declaration of Lawful Residence".

This position started to change in the 1990's and by the time the Population Management Law was introduced in 2016, all Registered Nurses were able to obtain Housing Licences. In contrast Registered Allied Health Professionals (such as Occupational Therapists, Biomedical Scientists, Radiographers and Pharmacists) have always been able to obtain Housing Licences. As a result, these staff have been responsible for finding their own accommodation and have not been eligible for staff accommodation which had to be kept for Registered Nurses who had no other option.

HSC are now at the point where all Registered Health or Social Care Professionals, including Nurses, Social Workers, Biomedical Scientists, Occupational Therapists, Pharmacists and Radiographers, for example, qualify for Long Term Employment Permits as well as some unregistered support staff and this group of staff needs to be treated equally in respect of accessing staff accommodation. This is currently not possible as there is simply not enough accommodation.

Current Staff Accommodation

HSC currently has access to a mix of staff accommodation that is owned or leased. The most popular accommodation units are John Henry Court (JHC) and Beauville. JHC is a purpose built accommodation block of 42 bedsits and 24 flats on the PEH campus. There are currently 60 people on the waiting list for a flat or bedsit at JHC and the property is always at capacity. Beauville is the first purpose built keyworker accommodation for families and is located in the Oberlands. Beauville has 14 one bedroomed flats and family accommodation based in two bedroomed houses with gardens (2) and six homes each with 3 bedrooms and gardens. There



are waiting lists for all of the properties at Beauville with 20 on the waiting list for the one bedroomed flats, 14 for the three bedroomed houses and 17 for the two bedroomed houses. The Beauville waiting list has been closed for some time due to the number of properties and number of staff on the waiting list.

The States of Guernsey also rents a total of 12 flats at Cour du Parc, 4 have one bedroom and 8 have 2 bedrooms. There are currently 40 staff allocated to the waiting list for Cour du Par, some of these may also be on other waiting lists.

In addition, HSC uses a range of accommodation, mostly for single occupancy which is rented from private landlords totalling 84 units over 23 sites. Much of this accommodation is not self-contained and staff are required to share kitchens and in some cases bathrooms. This is not ideal and a survey carried out in 2020 showed that those who responded would wish to live in family accommodation, own their own home or participate in a partial ownership scheme or live in keyworker accommodation with private facilities.

The table below shows the occupancy of keyworker accommodation for the first quarter of this year.

January	98.88%
February	98.81%
March	99.55%
April	99.30%

Current challenges

There is currently a real lack of rental properties on the local market and what is available is extremely expensive and means that a move to Guernsey is unaffordable for many staff. The States of Guernsey offers a rental subsidy to eligible employees moving to the Bailiwick to take up employment which can assist in the short term but once that assistance expires, rents become unaffordable for staff to remain.

The table below shows the % of income that goes towards rent with Rent Allowance payable and without Rent Allowance for a Band 5 qualified nurse and clearly demonstrates the significant financial challenges faced by staff when an average rent in the private rental sector is to be paid.



	£ With Rent Allowance	£ Without rent allowance
1 - Band 5 (qualified) Nurse		
Basic Pay	30,566	30,566
Income Tax	6,113	6,113
Social Security	2,017	2,017
Net income	22,435	22,435
Avg Rental	18,000	18,000
Rent Allowance	8,880	
Nett	9,120	18,000
% of income/rent	41	80

Because of this Operational Managers, the Keyworker Accommodation Team and members of the HR Team are receiving numerous requests from staff who are renting privately to move into staff accommodation once their Rent Allowance expires and Allied Health Professional's (AHPs) are also seeking staff accommodation when they take up post because of the difficulty in finding accommodation. HSC needs to be able to offer all keyworkers moving to the island the option of accommodation if we are to successfully recruit and retain staff in sufficient numbers to provide safe services.

Staff turnover in HSC

We were very fortunate in terms of staffing during the pandemic and turnover figures across the States of Guernsey reduced as travel was impacted. However, HSC is now seeing vacancy levels returning to pre-pandemic levels as highlighted below and the number of leavers increasing significantly. The data relates to all leavers from HSC for the 12 months prior to the May information shown below:

Year	Vacancy %	Vacant posts	Turnover %	Leavers
May-18	19.6%	444	14.8	294
May-19	20.5%	482	18.2	361
May-20	17.6%	422	15.1	295
May-21	13.4%	341	13.5	288
May-22	17.8%	422	20.4	414

Whilst HSC aims to recruit candidates directly, a number of candidates for permanent roles are introduced via agencies and agents have fed back that candidates are not pursuing roles here because of the fact that if appointed they may not be able to take up post because of the challenges of finding suitable affordable accommodation.

Property availability - Current Position

All of the properties owned or leased by HSC are full and in addition a total of 17 rooms are currently being rented at Waves Apartments which need to be vacated by the end of June. A change of use application for the Blue Horizon Hotel has been recently approved and HSC began renting this property from Tuesday 7 June 2022. This provides 28 en-suite rooms but 17 of these will be occupied by staff who need to be moved from Waves so in reality only provides an additional 11 rooms.

In contrast, HSC has recently had approval for a total of 38 new posts associated with the Critical Care Unit expansion, the Orthopaedic Waiting List initiative and extended opening hours in Radiology. A dedicated recruitment campaign is due to commence but the lack of accommodation is likely to impact on success.

Accommodation Needs

It has been suggested that a proposed new accommodation block be built on or very near to the PEH campus. This is because the vast majority of staff when requesting staff accommodation stipulate that they wish to be as close to their workplace as possible. For a high proportion of staff this will be the PEH although it is acknowledged that staff work from other sites or in the community and therefore the proposed developments in the North of the island at Fontaine and Kenilworth vineries will also be much welcomed. Whilst it is difficult to believe on an island the size of Guernsey, staff do frequently raise concerns about the length of commute from home to work which are valid if they do not have their own transport as shift times do not always align with bus timetables and routes. Accommodation which is two miles from your workplace may not seem an issue but if you are walking home in the dark at the end of a shift with limited street lighting and no buses it brings location into focus.

Feedback from staff allocated accommodation provided over the winter months at Waves at Vazon is that distance from the PEH campus was an issue for some of those staff. This required an investment into transport options to be made for the start and end of their shifts to make this accommodation an attractive option for them.

Consideration is also being given to installing modular accommodation on land owned by the States of Guernsey to bridge the gap until additional keyworker properties can be built on or around the PEH campus and at the Fontaine and Kenilworth Vinery sites.

There is a clear need for one and two bedroomed units of self-contained, staff accommodation for permanent new starters, staff currently living in private rental, for AHP's

who are renting privately and for short term agency staff, and for family homes. It will also allow those staff currently living in accommodation with shared facilities the option of moving into more suitable accommodation. If sufficient accommodation is built, HSC can stop using some of the less suitable accommodation, making it available for sale or for an alternative use if it is owned by the States, or cease renting it.

The number of staff or prospective staff waiting for accommodation fluctuates regularly but there is a core demand for a high number of additional units and this has been the case for quite some time. Based on the demand for self-contained accommodation on the PEH site and for other staff working in the Island on a short-term basis, plus that which is required for families (as demonstrated by the waiting list numbers above), approximately 150 units of accommodation could be filled immediately if it was available. There is also demand for more suitable accommodation for those living in privately rented properties, which are not accounted for in this number, and, as above, to ensure that access to accommodation for key workers is fairly applied to other staffing groups (to include Allied Health Professionals, for example), which is not possible at present.

Agency Staff

HSC is currently heavily reliant on the use of agency staff to fill vacancies and this is predicted to continue, although such high numbers could be mitigated by sufficient suitable accommodation being provided to attract permanent staff to the island. They are also used to cover short term requirements such as the increase in staffing levels agreed to cover winter pressures. The NHS Workforce Alliance reports that the use of agency staff is likely to remain a necessity to enable the NHS to deliver a flexible workforce that helps them to plug gaps during peak demand periods. HSC are competing with these trusts for agency workers and as a result there are fewer staff available, and rates have increased.

Growing our Own

It is accepted that an island the size of Guernsey is always going to be heavily reliant on recruiting health and social care professionals from off island, but HSC are committed to training individuals already resident for professional roles. Training programmes are currently in place for Registered Nurses, Social Workers, Biomedical Scientists, Clinical Psychologists, Health Visitors, District Nurses, CBT Therapists and School Nurses. Additional professions are added wherever possible as recruiting locally generally results in longer periods of retention and the accommodation issue is not a factor. HSC are working on increasing a presence at school and careers events to showcase the careers and learning opportunities on island.

Summary

If HSC is to continue to deliver the range of operational services currently available and meet its objectives under the Government Work Plan, it needs to recruit and retain sufficient staff to ensure safe services in a very competitive market. As has been evidenced above, the lack of staff accommodation is currently a real barrier to recruitment and retention and a decision about how to meet immediate accommodation needs to supplement medium and long-term options for the provision of additional key worker housing would be most welcome.

17th June 2022



Development &
Planning Authority

Sir Charles Frossard House
La Charroterie
St Peter Port
Guernsey
GY1 1FH
+44 (0) 1481 717200
planning@gov.gg
www.gov.gg

The President
Policy & Resources Committee
Sir Charles Frossard House
St Peter Port
Guernsey
GY1 1FH

9th June 2022

Dear Deputy Ferbrache,

Requête – P.2022/43 entitled ‘Additional Key Worker Housing’

Thank you for your letter of 27th May 2022 concerning the above, which was considered by the Development & Planning Authority (D&PA) at its meeting on 7th June 2022. The D&PA has noted your request for factual information to inform the debate on the Requete and has provided this below, following the bullet point headings in your letter:-

• **the relevant policy considerations where development is proposed within an Agriculture Priority Area (“APA”).**

The Agriculture Priority Areas (APA) are defined as large areas of contiguous agricultural land and other areas well related to established agricultural operations, which represent Guernsey’s most valuable agricultural land.

The Strategic Land Use Plan requires a balance to be made between the protection of land for agriculture for the industry’s current and future needs and recognising the role it plays in countryside management with ensuring land is available to meet other legitimate development requirements.

Therefore, whilst the IDP policy approach is to generally support development for agricultural purposes in APA these areas have been drawn broadly. The APA is not intended to safeguard land for agriculture if it is not appropriate to do so or is not required for that purpose. The IDP policy approach therefore allows for other forms of development in APA provided that certain criteria are met and all other policies of the Plan are met.

The site in question is part of an Agriculture Priority Area. The preamble to Island Development Plan (IDP) Policy OC2: Social and Community Facilities Outside of the Centres, confirms at paragraph 16.2.1 that development proposals relating to large-scale strategic social and community facilities which have an Island-wide relevance, such as the hospital and schools, will be assessed against Policy S5: Development of Strategic

Importance (please see below). The provision of key worker housing for health workers on or adjacent to the Hospital campus would be considered ancillary to and part of the Hospital use.

- **the relevant policy considerations in relation to development for the Hospital.**

Please see the information under the preceding bullet point.

- **the relevant considerations of the Authority in determining the potential for a development application to be considered under Policy S5: Development of Strategic Importance.**

IDP Policy S5: Development of Strategic Importance, states that:

Proposals for development that is of Strategic Importance and which may conflict with the Spatial Policy or other specific policies of the Island Development Plan but which is clearly demonstrated to be in the interest of the health, or well-being, or safety, or security of the community, or otherwise in the public interest may, exceptionally, be allowed where:

a. there is no alternative site available that, based on evidence available to the Authority, is more suitable for the proposed development; and,

b. the proposals accord with the Principal Aim and relevant Plan Objectives.

The Principal Aim of the IDP is to ensure land planning policies are in place that are consistent with the Strategic Land Use Plan and which help maintain and create a socially inclusive, healthy and economically strong Island, while balancing these objectives with the protection and enhancement of Guernsey's built and natural environment and the need to use land wisely.

Plan Objective 4: Support a healthy and inclusive society, seeks to achieve and promote development that supports a healthy and inclusive society where this meets the strategic objectives of the States of Guernsey, as set out within the Strategic Land Use Plan and the Principal Aim of the Island Development Plan.

Plan Objective 5: Ensure access to housing for all, seeks to achieve and promote a broad range of housing development that ensures an appropriate amount, mix and type of housing, including affordable housing, where this meets the strategic objectives of the States of Guernsey, as set out within the Strategic Land Use Plan.

In considering proposals under Policy S5, the Authority will need to be satisfied that the particular choice of location for a proposed development can be clearly justified and that the proposals represent the best practicable option, taking into account all relevant economic, social and environmental considerations. For this reason a detailed and comprehensive site selection study would be expected as part of the submission of a planning application as would measures to mitigate any harmful effects on the environment and opportunities for environmental enhancement.

- **any decision that the Authority has made regarding the potential for a development application to be considered on the APA at the hospital site.**

A copy of the D&PA's letter to Deputy Mahoney dated 12 April 2022 is attached. This clarifies the appropriate policy gateway. No decision has been made by the D&PA and any planning application received would be considered on its merits under the Land Planning legislation having regard to the requirements of the relevant policies and all material planning considerations.

- **the area of land required for commercial agriculture.**

At the time of preparation and adoption of the IDP, it was estimated that approximately 8,000 vergées of agricultural land was required for the dairy industry, plus 1,500 vergées for arable/other livestock. However, these estimates do not consider the additional amount of land required to enable rotation or land required for other types of commercial farming. There may also be a requirement in the future to grow more fodder crops to allow the industry to become more self-sufficient and sustainable, along with a possible increase in demand for smallholdings, and if so this will need to be reflected in revised estimates of agricultural land requirements to inform review of the IDP policies.

Preliminary work indicates an increase for livestock farming of an additional 885 vergées and an increase in the commercial dairy farming requirement to over 13,000 vergées. Further work is needed to establish the full requirement. However this preliminary work indicates a revised total of at least 15,385 vergées.

- **the total area of land included in APA.**

The APAs are broadly drawn and include areas of land which are not currently used for agricultural purposes and could not be expected to contribute positively to commercial agriculture in the future, for example dwellings and their curtilages.

The total area of land within APAs equates to c. 2, 589.7 ha (15,802 vergées). Analysis shows in 2020 there is approximately 1,373ha or 8,378 vergées of agricultural land available (excluding that used for keeping horses or managed as curtilage) within the APAs.

- **the total area of APA which has been permitted a change of use since the IDP was adopted.**

Since adoption of the IDP in 2016 until the end of 2020, the total change of use of agricultural land in APA to other uses is shown in the table below. Within the APA, the agricultural land permitted a change of use totals c.9.5ha.

Although the legal definition of agricultural land is used in the data presented below, because this definition is wide it does not necessarily give an accurate representation of the amount of land actively farmed, or land lost from active agricultural use and includes areas of open land which would not be able to be actively farmed.

Land use	Area of land changed to other use within APA	
	vergées	m ²
Leisure	7.84	12,850
Industry and storage	0	0
Visitor accommodation	5.28	8,660
Energy infrastructure	0	0
New office and associated curtilage	0.24	395
Domestic curtilage	44.4	72764
Total	57.76	94,669

Whilst providing the above information, the D&PA does however question the relevance of this point in the context of the development of residential accommodation at the PEH site, which is a wholly different proposition to the change of use of land to facilitate extensions to existing domestic curtilage in the circumstances where this is supported by the IDP.

- **the agricultural quality classification of the field the subject of the Requête.**

The land concerned is graded as Grade 3b: Moderate quality land in the Guernsey Agricultural Land Classification of 1989.

In identifying the APAs during preparation of the draft IDP, the Best and Most Versatile agricultural land in Guernsey was identified and mapped from the top three grades of soil, these being known as Grades 1, 2 and 3. Grade 3 is split into two subgrades, 3a and 3b. Grade 3b is subject to a moderate degree of limitation common to all Grade 3 land but also is subject to physical disadvantages, such as gradient, which restrict its flexibility and performance to levels below that expected of subgrade 3a land.

- **the pipeline housing supply and any anticipated delivery of key worker accommodation as part of that development.**

The latest data (IDP Quarterly Monitoring Report (QMR) for Quarter 1 of 2022) shows that the total 'pipeline' housing supply is 573 dwellings. The pipeline supply relates to new housing which is deemed to be effectively available where planning permission has been granted and the development is not yet complete, and where the development of new housing is acceptable in principle (with outline planning permission). It does not relate to completed dwellings. Of the 573 dwellings within the current pipeline supply, 556 are private market housing and 17 are Affordable housing. Affordable housing as defined in Guernsey legislation includes key worker housing.

In addition, the D&PA is aware of the following sites coming forward soon for planning approval, where there is reasonable certainty of Affordable housing being developed:-

- Fontaine Vinery (allocated housing site with Development Framework approved), developable area – Potential for 130 units
- Kenilworth Vinery/Salt pans (allocated housing site with Development Framework approved) – Potential for 135 units

In addition to providing the above information, the D&PA does wish to raise concerns about due process and statutory responsibility which could arise as a result of the Requête.

In considering any future application for planning permission, the D&PA would be legally obliged to do so on the basis of the full material planning considerations and in particular the policies of the States approved IDP, which are themselves founded on and consistent with the Strategic Land Use Plan (SLUP). In making any future decisions about potential development on APA, as outlined in the Requête, the States would also be legally subjected to the same policy requirements.

The Requête, however, ignores these established statutory processes and in doing so bypasses the mandate of the D&PA. This is of great concern to the Committee which considers that it would set an undesirable precedent and would prevent it from carrying out its statutory duties under its mandate and I consequently wish to place this concern on record as part of the D&PA's response to your letter of 27th May 2022.

Yours sincerely



Deputy Victoria Oliver
President, Development & Planning Authority

Deputy D. Mahoney
Policy & Resources Committee
Sir Charles Frossard House
La Charroterie
St Peter Port
Guernsey
GY1 1FH

12th April 2022

Dear Deputy Mahoney,

KEY WORKER ACCOMMODATION – PRINCESS ELIZABETH HOSPITAL

Thank you for your letter of 23rd March 2022 concerning the above matter, which was considered by the political Committee of the Development & Planning Authority at its meeting on 6th April 2022.

Following consideration of the matter, the Committee agreed, without prejudice to consideration of a formal planning application for specific development proposals, which would have to comply with other relevant Island Development Plan policies and the material planning considerations as set out in planning legislation, that development of the nature described in your letter could, in principle, be considered under IDP Policy S5 as a development of strategic importance, and that no Development Framework would be required.

I would add that the proposed location is sensitive, particularly in landscape character terms, and any plans submitted for consideration will need to respect the sensitivity.

Yours sincerely



Deputy Victoria Oliver
President, Development & Planning Authority



Committee *for the*
Environment & Infrastructure

Sir Charles Frossard House
La Charroterie
St Peter Port
GY1 1FH

+44 (0) 1481 227000
environmentandinfrastructure@gov.gg
www.gov.gg

President
Policy & Resources Committee
Sir Charles Frossard House
La Charroterie
St Peter Port
GY1 1 FH

20 June 2022

Dear Deputy Ferbrache

Requête – P.2022/43 entitled ‘Additional Key Worker Housing’

Thank you for your letter dated 27 May 2022 concerning the above. The Committee is pleased to provide information relevant to the requête relevant to its mandate.

The Committee’s purpose is to protect and enhance the natural and physical environment and develop infrastructure in ways which are balanced and sustainable in order that present and future generations can live in a community which is clean, vibrant and prosperous.

While Committee members (three of whom are signatories to the requête and two who are not) will express their individual views on the requête as a whole during debate, this letter will cover the many ways in which the Committee’s mandate is engaged, including housing policy in relation to land use, spatial planning and infrastructure, climate change, protection and conservation of the natural environment, traffic and transport, biodiversity, agriculture, and the sustainability of food and farming.

The requête makes the case for additional keyworker accommodation in Guernsey and proposes that with respect to accommodation for healthcare workers on or close to the Princess Elizabeth Hospital (PEH), brownfield sites should be prioritised over green fields, especially Agriculture Priority Areas.

The Spatial Strategy¹ seeks to concentrate development such as housing within and around the edges of the two main urban centres, with some limited development within and around the edges of the other main parish or local centres, in order to support more sustainable communities and avoid the urbanisation of the countryside. With respect to the latter, the Spatial Strategy encourages the redevelopment of brownfield sites in the interests of the efficient use of land and protection of the natural environment, recognising

¹ [SLUP approved by the States 30th November 2011 \(gov.gg\)](#)

the need to thoroughly explore opportunities to reuse previously developed sites and convert, redevelop and reuse vacant buildings and accommodation.

The Spatial Strategy confirms that agriculture has a multi-functional role, delivering not just food but other 'public goods' that have a considerable value for the local population, such as the protection and enhancement of the countryside. The Spatial Strategy notes that milk production is the most important farm enterprise and seeks to ensure that open countryside is protected whilst also facilitating a viable rural economy. It further notes that there is pressure on dairy farming due to the growing transfer of land to non-agricultural use, which warrants control by legislation. The Spatial Strategy explains that larger areas of contiguous agricultural land offer greater efficiencies for farming and as a result smaller, more isolated areas of agricultural land that are not as desirable to the industry are facing increasing pressure to accommodate alternative uses.

Accordingly, Agriculture Priority Areas were established through the Island Development Plan² (IDP) to protect larger areas of the most valuable contiguous agricultural land. Policy OC5(A) in the IDP supports development within APAs where that development is related to its agricultural use; any other kind of development will only be supported where it is demonstrated that the land is no longer required for agricultural purposes.

The Committee has responsibility for housing policy. There is a shortage of housing in all sectors and the Committee supports the high priority afforded to addressing this issue in the Government Work Plan³. The Committee recognises the current difficulty in accommodating healthcare workers and is aware of the impact this has both on the provision of healthcare and on the general housing market at a time when demand outstrips supply and house prices and rents are already high.

One of the IDP's overarching objectives is to ensure access to housing for all, achieving an appropriate amount, mix, and type of housing, including affordable housing in accordance with the SLUP. The IDP recognises that good land use planning is essential in delivering sustainable development, which is about meeting the needs of the present while safeguarding the interests of future generations.

Provision of homes in and around centres ensures that residents are close to shops and services and are provided with easy access to a range of activities. This in turn can reduce the need to travel, resulting in more sustainable living and fewer journeys undertaken by private motorised transport.

The IDP states that in order to make the most effective and efficient use of land on the Island, the creation of new dwellings outside of the centres will be supported only where this can be achieved through the subdivision of existing dwellings and the conversion of redundant buildings. This approach allows for use to be made of the existing housing stock and existing unused but structurally sound structures, whilst protecting the open areas of

² [Island Development Plan 2016 \(gov.gg\)](https://gov.gg/CHttpHandler.ashx?id=153352&p=0)

³ <https://gov.gg/CHttpHandler.ashx?id=153352&p=0>

the Island from development. Other forms of new housing development outside of the centres will not be supported.

However, as directed in the SLUP, the IDP does also make provision for social and community facilities outside of the centres to enable an adequate range of such facilities to be developed according to need and demand whilst maximising the use of existing sites. The IDP permits existing facilities to develop and expand to meet the needs of the Island population if such development can be achieved in a way that respects the spatial strategy and supports the principle of sustainable communities.

Policy OC2 stipulates that new social and community facilities outside of the centres will only be permitted where this can be achieved through the conversion of a redundant building. Proposals for the extension, alteration and redevelopment of existing social and community facilities will be supported where the proposal would not undermine the vitality of the centres, where it would be of a scale appropriate to its setting, where there are no unacceptable impacts on the visual appearance and amenity of the location concerned and where they accord with all other relevant policies of the IDP.

The PEH already provides some accommodation on-site for healthcare workers. Although that accommodation predates and does not conform with the Spatial Strategy, which promotes more sustainable living by providing homes in and around centres, it does partially support one of the sustainability objectives in that it removes the need for those residents to travel off-site to work, reducing the number of likely car journeys. The disadvantage of that accommodation being located outside of the main centre or its outer area is that while residents are close to work, they are not as close to shops and services as they would be within a centre, and don't necessarily have easy access to a range of activities.

Access to a range of mobility options, ideally including public transport, shared vehicles and active travel, can help to improve sustainability, affordability and residents' quality of life, and mitigate the land area requirements of any development or redevelopment for parking. The site is currently accessible by public transport, but it is the Committee's view that an increase of housing provision at or near the PEH (whether that's on a brownfield site or on an agricultural field) would require a commensurate improvement in transport options and the infrastructure necessary to facilitate them, in accordance with the Transport Strategy⁴ and the transport hierarchy set out within it. Improved choice would bring benefits not just to the individual residents but also to the Island community more generally, while better access to more sustainable forms of transport would also support the Climate Change Policy⁵ and the Island's net zero targets.

The development of new housing on or near the PEH site is likely to require improved infrastructure or strengthening of existing services more generally, potentially including not just infrastructure for transportation, but also for energy, water, sewage, communications

⁴ [CHttpHandler.ashx \(gov.gg\)](https://gov.gg/CHttpHandler.ashx?id=127345&p=0)

⁵ <https://gov.gg/CHttpHandler.ashx?id=127345&p=0>

and solid waste. The extent of the infrastructure requirements would be influenced by whether the housing was sited on previously developed land or on agricultural land.

The fields referenced in the requête are part of an APA, a larger block of contiguous agricultural land in this case used for grazing. The soil in this area is graded as 3b, which is categorised as moderate land quality. The Soil and Land Evaluation Report stresses that whatever its soil type or limitations on its use, all open agricultural land in Guernsey is valuable, and that its retention is important for the island. Even 'poor' quality land is valuable, the report explains, as it can still be used for some arable crops (the classification system is based on 'limitations' for agricultural cropping) or for grass crops for grazing or cutting. Such land may also be particularly valuable due to its closeness to other agricultural land, or in providing access to other land. The foreword to the latest (2010) issue states that it is increasingly recognised that with land scarcity, urbanisation, climate change and concern about food security it will be essential for the wellbeing of Guernsey people in the future. It expresses the view that protection from development should be a paramount consideration in all decisions.

The Soil and Land Evaluation Report also highlights the problem of fragmentation, which is an issue that was raised in the 2014 Dairy Industry Review Group Report⁶ as well. Good sized grazing blocks comprising contiguous fields are invaluable to dairy farmers, as they reduce or negate the need to move livestock over greater distances between disparate fields, with additional inefficiency and cost of labour and machinery that involves. Fragmentation is therefore a factor that should be considered in the context of the viability of Guernsey's rural economy and our dairy sector more specifically.

The Report also highlights that fields and in particular field boundaries (earth banks and hedges) are valuable as historical features, for wildlife and as an integral part of the landscape of the island, imparting the special quality that is 'Guernsey'.

The fields were classified as improved grassland in the 2018 habitat survey. This suggests there is currently lower botanical diversity than there would be in semi-improved or unimproved grassland, due to intensive agricultural management, primarily for silage production and grazing, but in all probability more botanical diversity than on a brownfield site. Officers have advised that further investigation would be needed before detailed evidenced conclusions could be drawn on the environmental impact of developing the fields referenced in the requête. This might include surveys relating to biodiversity and, if applicable, the specific environmental value of this site would be considered through an Environmental Impact Assessment.

It is possible (though not certain) that if these fields are developed for housing, the remaining agricultural land in the APA may be farmed more intensively, which would likely reduce its value in biodiversity terms.

Other considerations relating to loss of land classified as Agriculture Priority Area include the possible loss of foraging corridors for bats, a possible increase in light pollution, and the

⁶ [CHttpHandler.ashx \(gov.gg\)](http://CHttpHandler.ashx(gov.gg))

loss of the ecosystem services associated with this 'green lung' such as carbon sequestration, soil stabilisation and water and air filtration. The landscape character of the area would obviously also be altered, impeding the view of the farmland behind as well.

Much green space, including treed pastureland, has already been lost to development such as carparks at the PEH site in recent years. Various studies⁷ show positive effects of green spaces on physical and mental health, including improved healing in hospitals with green spaces outside windows, decreased anxiety and increased workplace satisfaction in offices with plants and/or views of nature, and improved mental and physical wellbeing with greater exposure to green spaces.

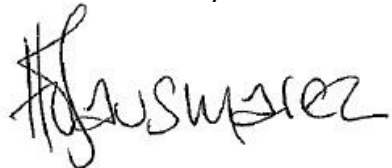
Green spaces in built up areas can also help mitigate and adapt to the effects of climate change, sequestering carbon and moderating the temperature (and associated health risks and costs) in urban heat islands.

Land use change such as the loss of vegetation cover is a significant driver of climate change globally. Locally, periodic habitat surveys⁸ have shown that Guernsey's species and habitats are in decline, including plants, birds, and insects. Building resilience of our species and the health of our marine and land environments to adapt to climate change is a key strategic need for the island. The Strategy for Nature⁹ sets a framework for an integrated policy approach to enable the successful delivery of objectives in both policy areas.

Climate change presents not just risks but some opportunities as well. The Green Economy Support Plan will explore Guernsey's potential for initiatives such as using local natural environments to sequester carbon to generate a revenue stream, for example.

The Committee hopes this information relating to its mandate will help to inform debate.

Yours sincerely



Deputy Lindsay de Sausmarez
President
Committee for the Environment & Infrastructure

⁷For example:

Brown DK, Barton JL, Gladwell VF. Viewing nature scenes positively affects recovery of autonomic function following acute-mental stress. *Environ Sci Technol*. 2013;47:5562-5569.

Kuo M. How might contact with nature promote human health? Promising mechanisms and a possible central pathway. *Front Psychol*. 2015;6:1093-1098.

Ulrich R. View through a window may influence recovery from surgery. *Science*. 1984;224:420-421.

Nieuwenhuis M, Knight C, Postmes T, SA Haslam. The relative benefits of green versus lean office space: three field experiments. *J Exp*

Im SG, Choi H, Jeon YH, et al. Comparison of effect of two-hour exposure to forest and urban environments on cytokine, anti-oxidant, and stress levels in young adults. *Int J Environ Res Public Health*. 2016;13:1-11.

Bratman GN, Hamilton JP, Hahn KS, et al. Nature experience reduces rumination and subgenual prefrontal cortex activation. *Proc Natl Acad Sci U S A*. 2015;112:8567-8572.

⁸ [Habitat Survey - States of Guernsey \(gov.gg\)](https://www.gov.gg/CHttpHandler.ashx?id=128405&p=0)

⁹ <https://www.gov.gg/CHttpHandler.ashx?id=128405&p=0>

c/o Rohais Health Centre, St Peter Port, Guernsey GY1 1FF
Telephone: 01481 723322 Fax: 01481 725200

18 March 2022



Deputy David Mahoney
By email

Dear Deputy Mahoney

We were excited to hear of your suggestion for a development of Key-worker housing on the PEH Site. As you are aware we have grave concerns for the future recruitment of medical staff and support staff in Guernsey. We fear this will impact on the ability for the Island to provide adequate medical facilities and thus a safe healthcare system in Guernsey.

We are aware of several Medical Consultants of high-calibre who have left Guernsey over the last three years, who cited the high cost of accommodation in Guernsey (and resulting lower disposable income compared with the UK) as a major factor in their decision to leave. It is well-known that many nurses, midwives and associated professionals leave Guernsey after two years' employment, once their housing grant is withdrawn. Therefore, as the global market for healthcare workers becomes even more challenging it is essential that Guernsey is able to provide quality accommodation at a reasonable price if we are to attract Key-workers to the Bailiwick from other jurisdictions, and retain them.

The States have a duty to provide healthcare services of a high-quality and there is therefore an urgent strategic need to house these Key-workers facing the otherwise highly unattractive costs of living in Guernsey. We feel that a purpose-built development is essential on the PEH site to provide housing for Key-workers - crucially at a rent comparable to that of the UK average for similar accommodation, for a term coinciding with the term of their employment.


The advantages of housing staff on the PEH site are clear. Staff are close to their place of work reducing the reliance on private transport, thereby reducing on-island carbon emissions, minimising the need for car-parking spaces and providing safe "commutes" to work for those working anti-social shifts.

Furthermore, the provision of this purpose-built accommodation would free up accommodation elsewhere on the Island.

We would also support the building of larger units of accommodation, probably off the PEH site, to house doctors and other professionals who would move to Guernsey with their families, to take up long-term employment.

In summary, we feel it is essential that the Island provide suitable accommodation for Key-workers on reasonable terms to maintain our healthcare service.

Kind regards

pp 
Benjamin Thomas
Vice President
(President 2019-2021)
Guernsey and Alderney Division of the British Medical Association.



CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you trust the sender.

Dear Deputies Brouard and Mahoney

Re Key worker accommodation

I thought it would be helpful to set out the Medical Specialist Group's position on the creation of key worker accommodation somewhere on the Princess Elizabeth Hospital campus.

We desperately need a range of attractive and affordable accommodation if we are to attract and retain high quality nurses to meet the rising demand for healthcare on the island.

Given the international shortage of nurses, it's a highly competitive market and we know that many nurses cite the lack of appropriate accommodation as the reason not to come to or remain in the island.

We firmly believe that key worker accommodation is needed on or extremely close to the PEH campus. On campus is where many nurses, particularly UK nurses, want to live. Even a 15- to 20-minute walk away from the campus is a deterrent when it is cold, wet or dark. Most nurses work long days and nights, so are coming and going at 7/8am and 8/9pm; many single women would be completely put off by even a 10 minute walk in the dark.

Additionally, having the accommodation on site is very valuable for our patients, as they are a reservoir of staff who can be quickly brought in to help, even if not on call, for those occasions when emergency workload is very high eg. opening a second emergency operating theatre..

Having said this, we appreciate the concerns that have been expressed about building on the green field on the campus. One option could be to offset the loss of the field by restoring a brownfield site elsewhere on the island to greenery.

We hope that a solution can be found that is acceptable to all sides.

Kind regards

Dr Gary Yarwood

Chairman MSG LLP

**Additional Key Worker Accommodation –
Selection of Possible Sites for further investigation.**

Requirements identified by officers supporting the Committee *for* Health & Social Care (“HSC”).

1. **Construction of not less than the equivalent of John Henry Court (min 70no. units of accommodation) and preferably 2no. John Henry Courts or circa 140 units.**

For the purposes of the exercise States Property Unit have used the bulk and massing of the existing John Henry Court as a benchmark. Any site not achieving 70 units is considered to not meet the minimum criteria.

2. **On or very near to the PEH campus.**

Rather than focusing on the PEH site and the adjoining land States Property Unit also assessed potential sites within 1km of the PEH. Any site beyond 1km was deemed to be out of scope. Site selection was primarily focused on land in the ownership of the States of Guernsey

3. **Delivered immediately/as soon as possible.**

Delivered immediately is assumed to be within 2-3yrs. Delivery dates >5yrs were deemed to not meet the criteria.

Questions from P&RC and responses

- **Identification of any other brown field sites around the hospital that are available to develop for key worker housing.**

The States Property Unit (“SPU”) reviewed property within a 1km radius of the PEH. The area to the north of the PEH comprises mainly the Havilland Hall estate, to the east is Mount Row and the outer residential areas of St Peter Port, to the south areas of residential and undesignated agricultural land, and to the west mainly agricultural priority areas.

SPU identified 14no. possible sites in either States of Guernsey or private ownership. The initial selection/identification was based on proximity to the PEH, size, and planning designation. Twelve of the selected sites are on the PEH site or are within 0.5km. and of those 5no. are in private ownership. The remaining two sites, Brickfield (Guernsey Water) and St. Martin’s Hotel are within 1km of the PEH. The attached plans and spreadsheet set out the site details & locations.

The sites were then scored against the 3 HSC criteria set out above as well as neighbour impact, environmental impact, and cost. For the 3 HSC criteria any site that failed to meet any one of those criteria was deemed to *not meet the minimum criteria*.

The scores and rankings are set out in the attached spreadsheet.

- **Comparative costs and timeframes for developing the Duchess of Kent site and the adjacent field**

SPU quantity surveyors have undertaken initial high level 'order of magnitude' cost estimates to allow the assessment of the relative costs of site developments.

The costs are based at 2nd Quarter 2022 prices with inflation assumptions that it will take one year to give the go ahead to proceed, procure a design team and achieve design development to RIBA stage 2 at which point (based on a Design and Build approach) tenders could be sought and construction works commenced whilst the design detailing continues with a further two year of construction/design development timeframe, so circa three years overall until handover/ occupation is achieved as a minimum.

In terms of accommodation provision, the options have been based on 140no. flats with one double bedroom, a shower and W/C, a kitchenette space, and a small lounge/dining area.

The following figures are inclusive of Construction Works (with allowances for car parking; landscaping; known site abnormalities such as slopes and retaining walls but without any site investigation reports); Professional Fees for the design team appointment; allowance for current supply market conditions and Optimism Bias to reflect the very early stage of the development process. It should be noted that the costs are given in a range to reflect development stage and that decisions of specification levels are yet to be decided, so the lower end reflects a more basic end product, whereas the upper end reflects a better level of finish in the final product although this is not to be considered at the high spec end of the spectrum.

- **Option 1: The Valley Site - £36 to £44m** based on two blocks of accommodation and 140 car parking spaces.
- **Option 2: The Duchess of Kent site Demolish and Rebuild - £33 to 39m** based on one block of accommodation and 60 car parking spaces due to site restrictions

For completeness the refurbishment of the existing Duchess of Kent building, which generates up to 60no. units of accommodation and 60 car parking spaces is estimated to be circa £13 to £16m, however this would not achieve the most efficient use of the site and would be constrained by the existing envelope (see below regarding intended short to medium term proposals).

Please note the following exclusions from all Options:

1. Any furniture and fixtures to fit out the buildings although this could be contained within the Optimism Bias allowance.
2. Land Acquisition or Covenant costs if required.
3. Any planning restrictions or requirements.
4. Any asbestos related issues within the existing buildings.
5. Any underground antiquities or obstructions discovered from the site investigation reports required later in the process.
6. Decant and moving costs from the Duchess of Kent.

- **How long it would take to decant Duchess of Kent and any associated costs.**

It is likely that the site will not be able to be vacated for at least 5 years.

Currently the Duchess of Kent (the section to the rear) is occupied by a range of front facing Health & Care services, including specialist housing for Adult Learning Disability (ALD) Residential Service Users, The Pain Service (Adults Community Services) and the Reparative Care Team (Children & Family Services).

Le Vauquiedor offices (to the front) are utilised by Occupational Health (Service User facing clinical provision) and various back-office staff including; Public Health, Transformation, Finance, HR, Procurement, Off-Island Team, Client Team, Quality & Patient Safety, and Operational Management, totalling around 150 staff

The 8No. ALD residents living in the Duchess of Kent will move to new purpose-built specialist accommodation at La Vielle Plage once built in approximately two years' time. Early exit of these residents is not considered feasible due to the specialist nature of their requirements. The new build at La Vielle Plage is considered the most expeditions way to relocate these individuals. There are currently no immediate plans or options for Adult Learning Disability (ALD) Residential Service Users and The Pain Service (Adults Community Services) to relocate as these would be considered under the pipeline Principal Community Hub project. A suitable alternative location for these services has not been identified. Castel Hospital does not have sufficient capacity and no other SoG property has been identified as being suitable. To avoid considerable additional costs it would be preferential to accelerate the principle community hub from pipeline to a live project but that will have considerable cost and resourcing implications.

There is an intention to relocate up to 40 x central staff from the Vauquiedor Officers to other SoG buildings. This is currently dependent on the ongoing review of the rotational working policies and the space available at SCFH, so it is likely any moves will not be possible until Q4 2022, subject to the space being available at SCFH. Vacant space achieved will be utilised by the Hospital Modernisation Programme, to decant teams out of the main Hospital building enabling building works to take place. Requests have been received to accommodate other Health & Social Care Teams on the PEH Campus and plans are currently being worked up to consider whether these requirements can all be accommodated. Consequently, the site will be required to deliver Health & Social Care Services for the duration of the Hospital Modernisation Programme (phase 2 estimated to be up until circa 2028) and potentially beyond, subject to the condition of the building.

Several of these staff moves will be linked to the Government Work Plan pipeline projects and the development of community services, as well as further property rationalisation plans that will be enabled by the evolution of the provision of community services.

In terms of costs, an early exit would have significant operational implications and likely to incur commercial annual rental costs of circa £250k per annum

In addition, there are likely to be one off FF&E costs including: furniture, IT infrastructure connectivity, signage, comms & physical relocations, of approximately £750k.

Options for relocating c. 100 staff not included in the rationalisation project have been considered at a high level. Currently it is highly unlikely that there will be space within SCFH to accommodate these staff in the short or long-term, even with modern ways of working. Raymond Falla House has been considered but this is currently believed to be the best location for the Children's and Family Hub with staff relocating from Lukis House, Swissville (inc. Garden Hill) and the Reparative Care Team from the Duchess of Kent.

Both Lukis House and Swissville (inc Garden Hill) are considered unsuitable for ongoing service provision. The exit of both these properties is not likely for c.2 years subject to funding of the works requires to RFH. Neither Lukis House or Swissville are considered appropriate for the staff from La Vauquiedor officers due to poor condition, disjointed properties and need for significant investment. Notwithstanding the operational implications of exiting La Vauquiedor, the most likely solution would be a commercial rental which, subject to availability, would incur costs as highlighted above.

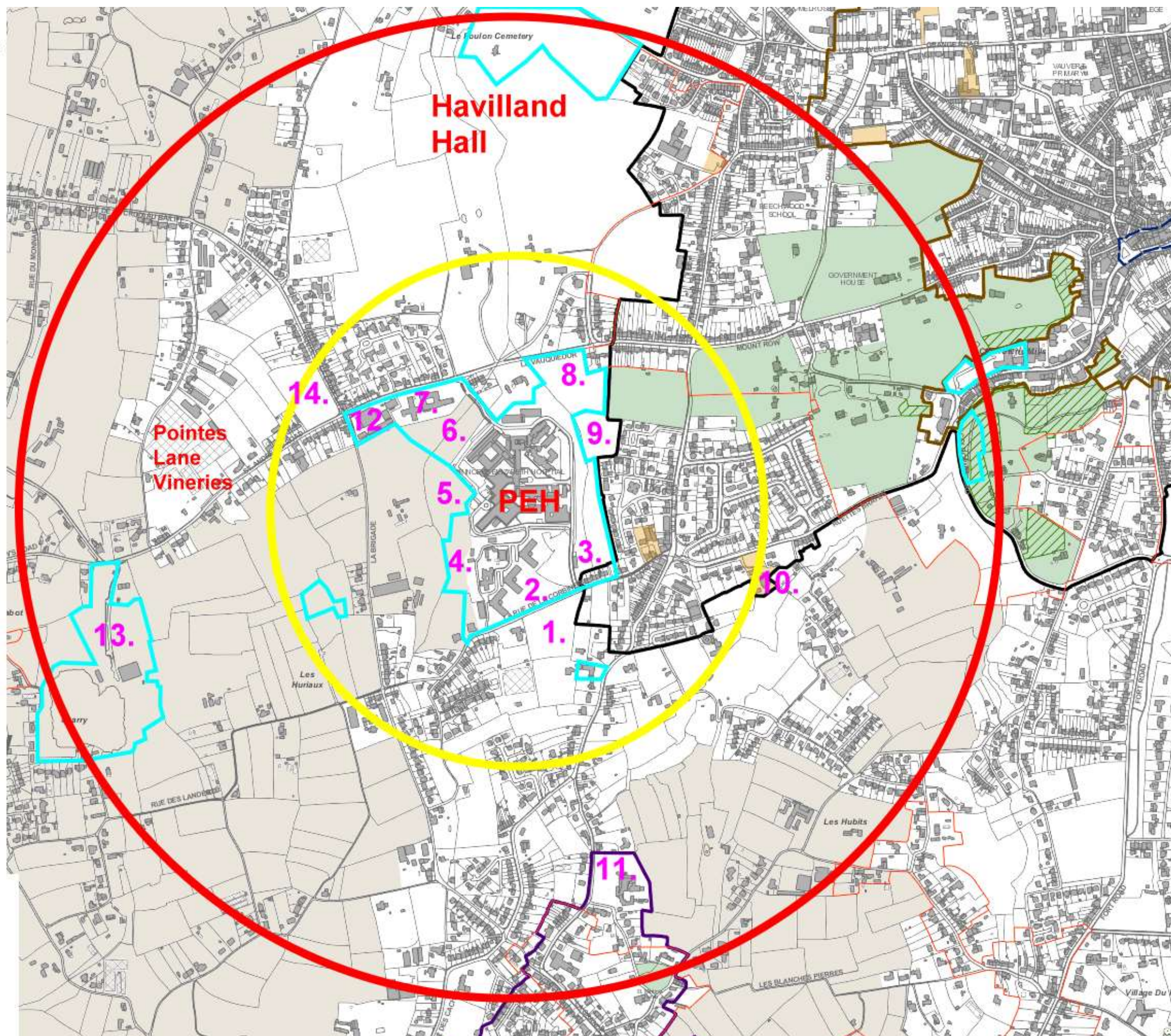
The earliest exit from DoK and Le Vauquiedor is likely to be 2+ years but this will incur significant costs and resource allocation which would have a detrimental impact on other workstreams and service delivery. A more realistic exit would be circa 5 years, subject to a number of other workstreams and detailed review of operational requirements.

 1000m Radius
 500m Radius

Legend

 Main Centre Outer Boundary
 Main Centre Inner Boundary
 Harbour Action Area
 Regeneration Area
 Core Retail Area
 Local Centre Boundary
 Housing Allocation
 Airport Land
 Safeguarded Area
 Conservation Area
 Important Open Land
 Site of Special Significance
 Area of Biodiversity Importance
 Area of Biodiversity Importance - Foreshore
 Agriculture Priority Area
 Key Industrial Area
 Key Industrial Expansion Area
 Office Expansion Area

NB: 13. Brickfield
 is in an agricultural
 priority area



1. Field opposite Oberlands entrance
2. Oberlands car park
3. Field behind Chest & Heart
4. Field behind mental health block
5. Field opposite Bulstrode House
6. Valley field
7. Duchess of Kent & Vauquiedor offices
8. Vauquiedor valley
9. Vauquiedor valley 2
10. Braye Lodge Hotel
11. St Martin's Hotel
12. Dairy site
13. Brickfield
14. Field opposite Dairy

States of Guernsey
 Sites outlined in
 blue



1. Field opposite Oberlands entrance
2. Oberlands car park
3. Field behind Chest & Heart
4. Field behind mental health block
5. Field opposite Bulstrode House
6. Valley field
7. Duchess of Kent & Vauquiedor offices
8. Vauquiedor valley
9. Vauquiedor valley 2
10. Braye Lodge Hotel
11. St Martin's Hotel
12. Dairy site
13. Brickfield
14. Field opposite Dairy



Health & Social Care



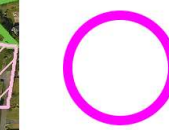
Strategic Property Unit



Environment & Infrastructure



Housing

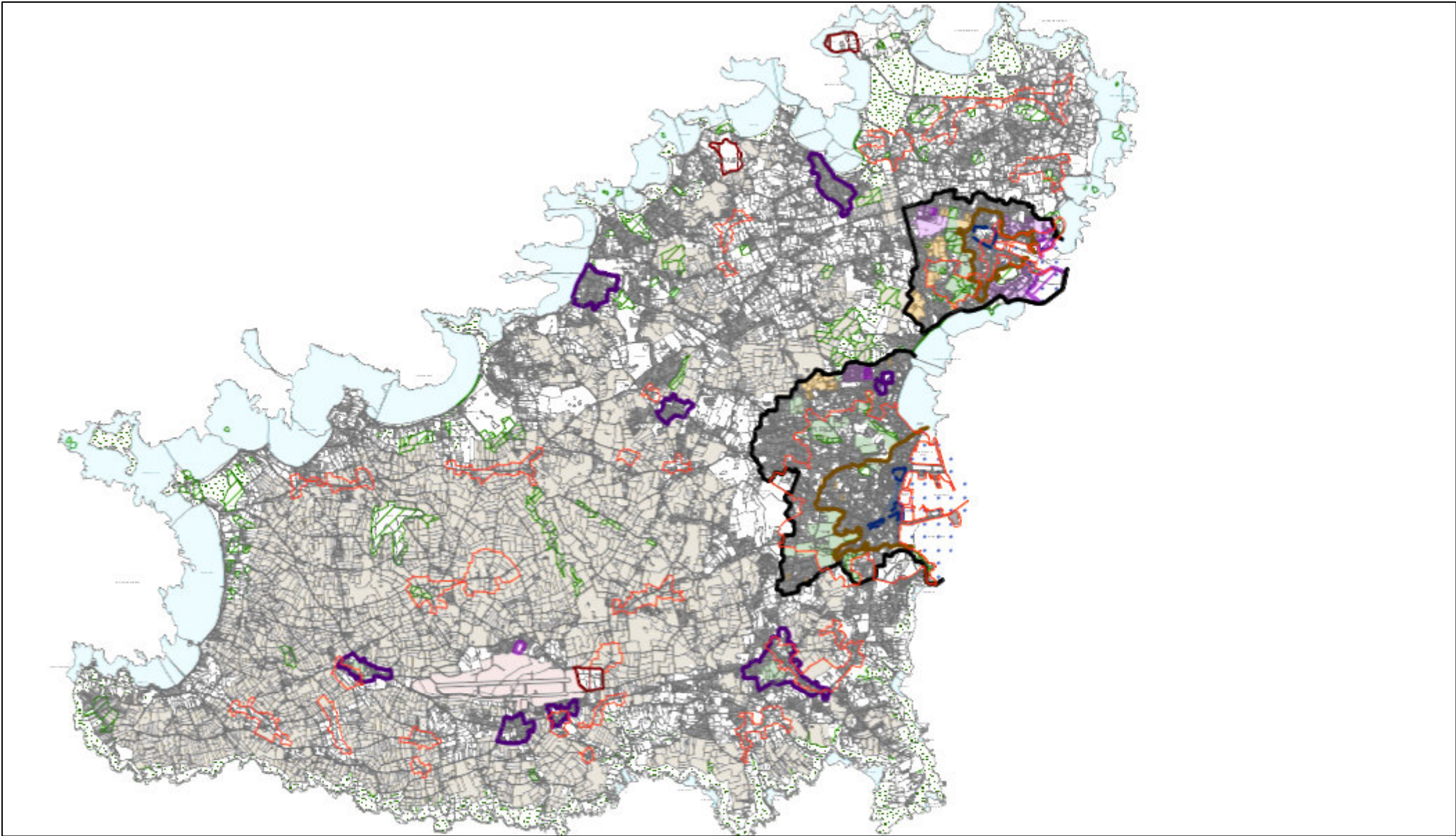


500m radius

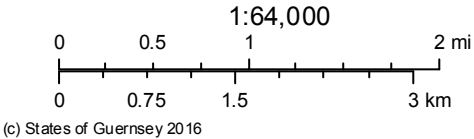


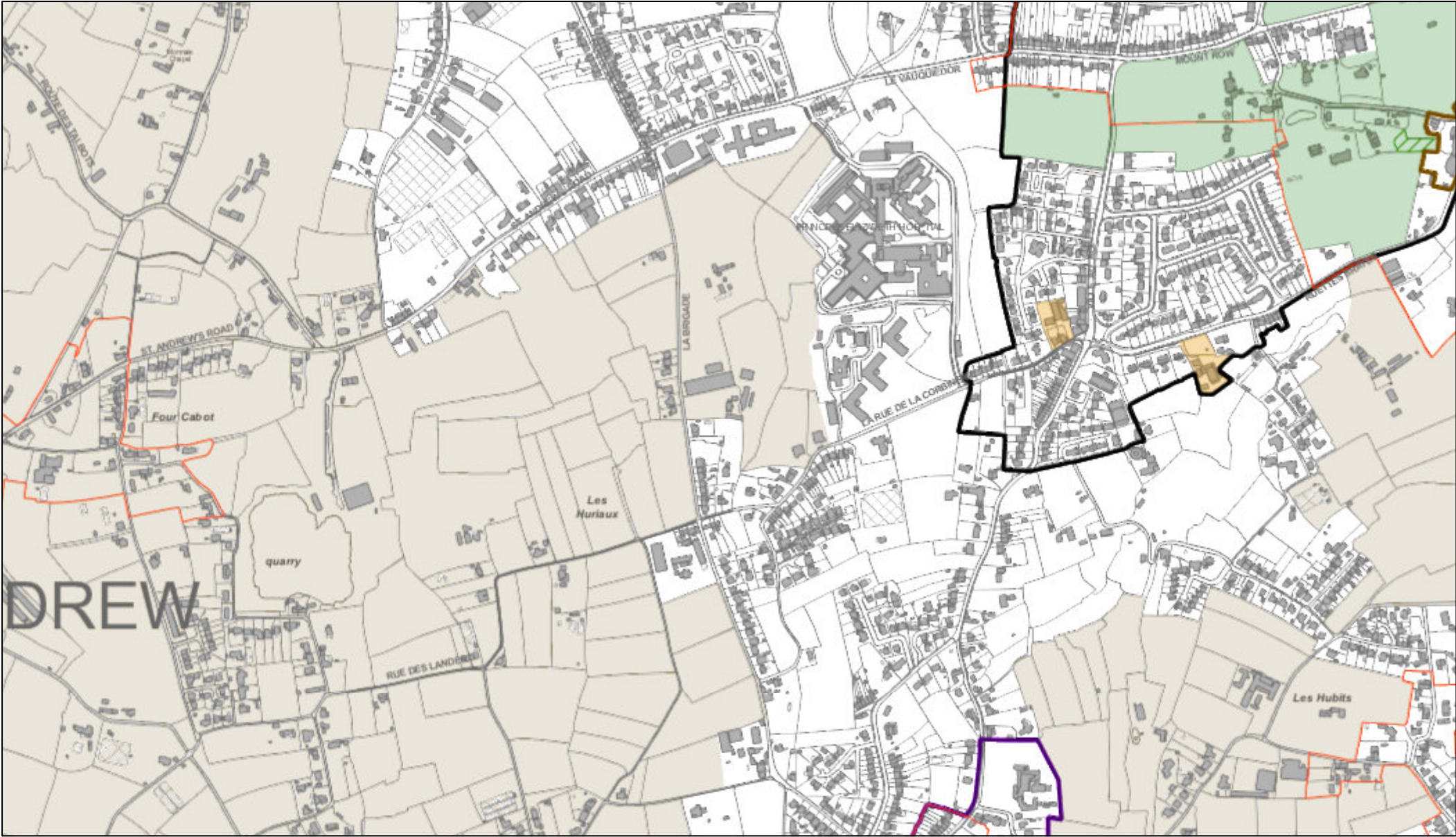
1Km radius

Site Details								HSC Requirements					Other Factors						
Site No.	Site Name	Ownership	Existing Use	Cadastre No.	Surface Area sqm	Green, brown, future brownfield	Planning designation in IDP	Can the site accommodate min 70 units and up to 140 units? <70= 0 70-100=3 >140=5	Comment	Approx distance from PEH 0-500m=5 500-1000=3 >1000=0	Can the site be delivered immediately i.e. within 2-3yrs? <3yrs=5 3-5yrs=3 >5yrs=0	SCORE	Neighbour Impact Low=5 Medium=3 High=1	Environmental Impact Low=5 Medium=3 High=1	Cost - High/Med/Low Low=5 Med=3 High=1	SCORE	Total	Rank	
1	Field opposite Oberlands entrance	Private (consider selling at development rates)	Agriculture	J005860000	11,180	Greenfield	Undesignated	3	Planning - bulk & massing constraints	5	3	11	2	3	2	7	18	7=	
2	Oberlands car park	States of Guernsey	Car park	J00579A000	1,605	Brownfield	Undesignated	0	Planning - bulk & massing constraints	5	5	10	2	5	5	12	22	N/A	
3	Field behind Chest & Heart	States of Guernsey	Agriculture	A404440000 & J005740000	11,591	Greenfield	Undesignated	3	Planning - bulk & massing constraints	5	5	13	2	3	4	9	22	2=	
4	Field behind mental health block	States of Guernsey	Agriculture	J00579A000	6,661	Greenfield	Agricultural Priority Area	1	New substation on site	5	1	7	5	2	4	11	18	7=	
5	Field opposite Bulstrode	Private (owner unwilling to sell)	Agriculture	J005770000	10,012	Greenfield	Agricultural Priority Area	5	Agricultural - Moderate quality	5	1	11	5	2	3	10	21	4	
6	DOK-PEH Valley field	States of Guernsey	Agriculture	J00577A000 & K00495D000	11,124	Greenfield	Agricultural Priority Area	5	Agricultural - Moderate quality	5	5	15	5	2	3	10	25	1	
7	Duchess of Kent & Vauquiedor	States of Guernsey	Admin & service provision	K00495B000	8,172	Future Brownfield	Undesignated	4	Built up land and structures in use	5	0	9	5	4	4	13	22	N/A	
8	Vauquiedor valley	States of Guernsey	Agriculture	A404070000 & J005740000	16,905	Greenfield	Undesignated	3	Bulk & massing constraints, agricultural-excellent	5	5	13	3	3	3	9	22	2=	
9	Vauquiedor valley 2	Private	Agriculture	A404080000	6,937	Greenfield	Undesignated	1	ACLMS - Agricultural - excellent	5	2	8	2	3	2	7	15	10	
10	Braye Lodge	Private	Car park	A40521A000 & J004350000	6,731	Brownfield	Housing Allocation	2	Built up land and structures in use	3	2	7	5	5	2	12	19	5=	
11	St Martin's Hotel	Private	Landbanked	J003770000	26,082	Brownfield	Undesignated - Inside Local Centre Boundary	5	Built up land and structures	2	1	8	5	5	1	11	19	5=	
12	Dairy	States of Guernsey	Dairy	K00495A000	5,389	Future brownfield	Undesignated	3	Built up land and structures in use	5	0	8	5	5	3	13	21	N/A	
13	Brickfield	States of Guernsey	Open storage	K00509A000	8,750	Brownfield	Agricultural Priority Area - but industrial site	3	Currently identified for future dairy	2	0	5	4	4	3	11	16	N/A	
14	Field opposite dairy	Private	Agriculture	K004410000	11,644	Greenfield	Undesignated	5	Agricultural - excellent	4	1	10	1	3	2	6	16	9	
								Deemed unsuitable	Unlikely	Possible	Probable								



June 16, 2022





June 20, 2022

