



**The Draft 2011 Island  
Plan Interim Review July  
2013 Examination in  
Public**

**Written Statement in  
Response to the Final  
List of Topics: Housing  
Policies H1 to H6  
Issued 27<sup>th</sup> November  
2013**

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**On behalf of:**

**MS Planning Ltd**

**6<sup>th</sup> December 2013**

**Written Statement Topic: Housing (Day 1, Tuesday 14<sup>th</sup> January 2014)**

**1.0 Housing - General**

**Question 1:**

***“Are the proposals consistent with the strategic policies in the Island Plan, especially SP1, 2, 4, and 6?”***

**Response (63 words):**

1.1 Where the level of housing proposed is insufficient to support the workforce necessary to enable the economic aspirations for Jersey (as set out in Strategic Policy 5) to be realised then the proposals in respect of housing will not be consistent with the Strategic objectives of the Island Plan. This matter is reviewed in more detail in response to Question 2 below.

**2.0 Demand / Need**

**Question 2:**

***“Are the forecasts in the section on “Demand for Homes” (paras 6.15-37 and summarised in Table 6.2) reasonable? Do they under-estimate, or over-estimate, the demand (or perhaps the “need”) for housing development during the Plan period? Is there sufficient flexibility to respond to any changes arising from the Long Term Plan mentioned in para 6.20?”***

**Response (1,244 words):**

2.1 The key concern in respect of the forecasts set out within paragraphs 6.15 to 6.37 and Table 6.2 of the 2011 Island Plan Interim Review (“Interim IP”) remains the lack of transparency in terms of how the figures are calculated (please see section 3 of the representations to the Interim IP prepared by Pioneer on behalf of MS Planning Ltd (dated 18<sup>th</sup> of September 2013 – “Pioneer Representations” – **ATT1**).

2.2 Whilst further 2013 Core Documents now appear to have been made available, these do not identify on a step by step basis (with clear reference to the specific source data tables within the actual documents) how the housing requirement figures are calculated.

- 2.3 Interim IP Table 6.1 housing requirements assume capped net in-migration of +150 households per annum (suggested to equate to 325 people per annum<sup>1</sup>). There are significant concerns regarding this approach, and whether this level of in-migration reflects past trends.<sup>2</sup> Will this level of in-migration enable the realisation of Jersey's aspirations for economic growth (a key factor of Policy SP5)? It is unclear from the Core Documents that an economic impact assessment has been undertaken by the States on this matter.
- 2.4 The Jersey Population 2013 Release report ("JPR" **CDBT5** - which appears to have been published on the 19<sup>th</sup> of September 2013<sup>3</sup> the day after the Pioneer Representations dated 18<sup>th</sup> September) models population scenarios including different levels of net migration. The closest scenario to the Interim IP net +150 in-migrant households is based on a net in-migration of +350 people.<sup>4</sup> This level of net in-migration is suggested to increase the dependency ratio (i.e. the ratio of non-working age to working age individuals) significantly from 46% in 2010 to 68% in 2035 and to 74% by 2065.<sup>5</sup>
- 2.5 Whilst increases in the dependency ratio to the end of the Plan period (2020) appear similar across all of the scenarios,<sup>6</sup> in the medium term (2035) the 'Increase Registered Inward 20% per year for a decade' scenario ("20% Scenario") emerges as the scenario most able to keep dependency levels at a lower level (i.e. at 62%),<sup>7</sup> and by 2065 this scenario is clearly the most successful approach at maintaining lower dependency levels (i.e. at 67%).<sup>8</sup>
- 2.6 The 20% Scenario requires an increase in the inward migration of Registered persons of 20% for the first decade (i.e. throughout the current Jersey Plan period);<sup>9</sup> the JPR states that this equates to the net in-migration of 1,100 people per year for the first 10 years, falling to 800 per year thereafter. This should be reflected in the current Plan housing targets, as opposed to in a future Plan period.
- 2.7 Unfortunately, this population scenario is not a modelled household projection within the 'Jersey Household Projections 2013 Release' report ("JHR" – **CDBT5a**), but based on the Interim IP contention that 325 people equate to broadly 150 households<sup>10</sup> (i.e. 2.17 people per household on average) going forwards this crudely suggests an annual requirement for

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<sup>1</sup> paragraph 6.20, Interim IP

<sup>2</sup> Pioneer Representations paragraphs 3.14 / 3.18

<sup>3</sup> based on the document properties of the published Core Document version - <http://www.gov.je/Government/Pages/StatesReports.aspx?ReportID=968>

<sup>4</sup> page 8, JPR

<sup>5</sup> page 8, JPR

<sup>6</sup> page 24, JPR

<sup>7</sup> page 25, JPR

<sup>8</sup> page 26, JPR

<sup>9</sup> page 20, JPR

<sup>10</sup> paragraph 6.20, Interim IP

507 households for 10 years (i.e. to beyond 2020) followed by 369 households thereafter. However, this may be an under-estimate given that the +700 migration scenario (which is suggested to be the second most effective population scenario at keeping the dependency ratio low) suggests, based on the JHR modelling,<sup>11</sup> an average of 541 new households annually for the period 2013 to 2020 (4330 over 8 years).

- 2.8 This is significantly more than the 2,450 households suggested within Table 6.1 of the Interim IP, even before any 'latent' requirement (which the Minister's response to Pioneer's September 2013 Representations<sup>12</sup> (**ATT2**) suggests is addressed by the inclusion of the findings of the 2012 Housing Needs Survey) has been taken into consideration.
- 2.9 Whilst there may be some restricted positive impact from short term working visitors (who are not reflected in JPR modelling although will still require accommodation for their stay) it remains questionable whether the States selected approach to in-migration will support Jersey's economic aspirations, ensuring a sufficient proportion of the population remains of working age.
- 2.10 The States' appears to acknowledge that the estimated additional dwelling requirements in Table 6.1 are too low, proceeding to draw on the 2012 Housing Needs Survey data (as analysed within the 2013 to 2015 Jersey Housing Assessment – "JHA" – **CDBT3**) and adding in additional dwelling numbers for 'affordable housing' within Table 6.2.
- 2.11 This is confusing; whilst the 2013 population and household projections should be capable of informing the overall housing net shortfall (including all tenures), an unreasonably low level of additional housing requirements has been included at Table 6.1 resulting in a conflict with the numerical shortfall outputs of the JHA baseline modelling (which includes higher in-migration assumptions of 1000 households between 2013 and 2015 / 333 per annum based on 'current trends' thus concluding a 3 year housing shortfall of 1470, of which 420 are affordable housing).
- 2.12 The overall housing targets in Table 6.2 are apparently guided by the notion that inward migration should be restricted to half of the current trend levels (i.e. hence Table 6.2 draws on the JHA scenario of 500 net inward migrant households over 3 years / 167 per annum instead of 1000 over 3 years / 333 per annum). In so doing a net shortfall of 1080 owner occupier dwellings and 410 social homes is suggested by the JHA<sup>13</sup> 2013 to 2015 – this broadly equates to the housing targets in Table 6.2 of the Interim IP, which also broadly

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<sup>11</sup> the JHR modelling already takes households living in communal establishments into account.

<sup>12</sup> Volume 1, November 2013, page 166

<sup>13</sup> page 16, JHA

equate to the outputs of the net +350 migration / +150 in-migrant households per annum JHR scenario (which suggests an increase of 1260 households 2013 to 2015 and 3190 2013 to 2020), but the economic impact of this reduced inward migration approach upon Jersey is not assessed.

2.13 As noted in paragraph 2.4 above restricting net inward migration to +350 people a year will not assist with maintaining the working age / non-working age dependency ratio at a relatively low level. This is of significant concern, particularly in the absence of an economic impact assessment. Where inward migration occurs at current or higher levels this will result in a significant shortfall in housing supply under the proposed targets. The ability of the Interim IP to flex in response to issues arising out of the 'Long Term Plan' is unclear as this is yet to be prepared / published for consideration.

2.14 In conclusion, the housing targets in Table 6.2 are unreasonable as these:

- i) are calculated in a way which remains unclear - the process leading to the figures is not set out step by step for comment and review within either a supporting document or the Interim IP,
- ii) underestimate the level of housing required on the basis that the housing levels proposed are suggested by the States modelling as being likely to result in a significant escalation in the dependency ratio of non-working households to working households,
- iii) assume / require a restriction of net inward migration of half of the acknowledged current trend levels apparently without testing the impact of such an approach upon economic growth / aspirations in Jersey, and,
- iv) are not sufficiently flexible to enable increased housing in the next decade – this is suggested in the JPR / JHR modelling to be necessary if appropriate levels of inward migration are to take place to ensure that dependency ratios are prevented from spiralling out of control. An ability to respond to the Long Term Plan is therefore also unlikely, although the full impact cannot be known until this published.

### 3.0 Supply of Homes

#### Question 3:

*“Leaving aside specific sites for later debate, is the supply of homes (paras 6.38-6.85 and summarised in Table 6.3 and Proposal 20) reasonable?”*

#### Response (419 words):

- 3.1 This matter is already addressed in detail in the Pioneer Representations dated 18<sup>th</sup> September 2013, section 4 (ATT1).
- 3.2 It is of continued concern that the assumptions in respect of the redevelopment of States owned housing land has been turned around from a 300 dwelling deduction from the net overall housing land supply within the 2011 Island Plan to become an assumed supply of +400 adding to the net overall housing land supply in the Interim IP.
- 3.3 Much of this supply is referred to in the Residential Land Availability report (“RLA” CDBT6 - January 2013 – although document properties suggest that the RLA was published in PDF file format on the 23<sup>rd</sup> of September 2013) as being based on ‘anticipated yields’ from the redevelopment of the States’ sites, and as such it is unclear how deliverable this supply source will prove to be. The discrepancy between the 2011 Island Plan and the Interim IP assumptions remains unexplained.
- 3.4 The RLA suggests that a net supply of 352 homes per annum has been achieved in the last 5 years. If this trend continues to 2020 a shortfall of 634 dwellings will accrue by the end of the Plan period even on the basis of the reduced inward migration housing targets proposed in the Interim IP (and extends to a shortfall of up to 1514 against the increased net housing requirement suggested by States modelling to be necessary to prevent dependency ratios deteriorating significantly - see paragraphs 2.5 to 2.7 of the Written Statement at Section 2.0 above). Where economic growth is restricted as a result of insufficient inward migration / insufficient housing provision this may have an on-going negative impact on the ability of the States to meet its housing targets, particularly through private development.
- 3.5 In any event, even if the supply of 3670 dwellings summarised within Tables 6.3 and 6.4 of the Interim IP is taken at face value, this will only be sufficient where the proposed housing targets in Table 6.2 (which rely on a significant restriction upon inward migration despite the unknown consequences for economic growth / sustainability) are accepted. If it is accepted

that these housing targets are unreasonably low, and an increased level of housing delivery of up to 541 net new homes per annum are deemed necessary to 2020 – i.e. 4330 over 8 years (see paragraphs 2.5 to 2.7 of the Written Statement at Section 2.0 above) - it is apparent that the 3670 supply would be 660 dwellings short by 2020.

**Question 4:**

***“In particular are the figures for the redevelopment of States-owned sites, and the two figures for windfall sites, reasonable?”***

**Response (51 words):**

3.6 Please see the concerns raised in paragraph 5.9 of the Pioneer Representations (ATT1) and re-confirmed at paragraphs 3.2 and 3.3 above. Based on past net delivery trends it is unlikely that the build rate assumed in Table 6.4 of the Interim IP will be achievable – please see paragraph 3.4 above.

**Question 5:**

***“Are the States-owned sites (in Policy H1) likely to come forward in the timescale proposed? Might other States-owned sites come forward?”***

**Response (85 words):**

3.7 Based on past net delivery trends it is unlikely that the build rate (including from States-owned sites) assumed in Table 6.4 of the Interim IP will be achievable – please see paragraph 3.4 above. The ability for the States to finance the development of States-owned land may be compromised where economic growth is stifled as a result of insufficient inward migration / a lack of sufficient zoned housing land to enable inward migration in addition to meeting the housing requirements of the existing resident population.

**Question 6:**

***“Under what circumstances would the use of CPO powers be appropriate?”***

**Response (100 words):**

3.8 Given that the States relies upon the majority of the housing supply coming from private development (as opposed to through public sector organisations as a result of the development of land already owned by the States) it is unclear that increased CPO powers would enable the viable delivery of housing. In a free market and in the interest of encouraging sustained economic growth to the benefit of the Island inhabitants, such

draconian measures should be avoided, particularly as in the absence of private investment these provide no guarantee that housing delivery on CPO land will be viable / achievable.

#### **4.0 Affordable Housing**

##### **Question 7:**

***“Is it right to set aside the previous Policy H3?”***

##### **Response (200 words):**

- 4.1 It is entirely appropriate for Policy H3 to be set aside. The reasoning for this is set out in detail within the representations prepared by Pioneer on behalf of MS Planning and submitted during the 2011 Island Plan Examination (dated 17<sup>th</sup> March 2010 – Section 3.5 – **ATT3**) and a further response submitted as a Written Statement in response to the examining Inspector’s ‘Housing Topic Session 3’ question 1 (prepared by Pioneer on behalf of MS Planning and dated 31<sup>st</sup> August 2010 – **ATT4**).
- 4.2 In summary, it is likely that the application of a policy such as Policy H3 would result in the provision of a level of affordable housing over the plan period that exceeds the overall delivery target for ‘Category A housing’ and would, inevitably, reduce the number of Category B dwellings that can be delivered.
- 4.3 Windfall sites would be unlikely to be released for housing development if Policy H3 is in operation. This would seem to be an unnecessary and unjustifiable risk when it is considered that with the appropriate zoning of sites through the existing Island Plan mechanism it is possible over the life of the plan to deliver sufficient Category A dwellings to meet need.

##### **Question 8:**

***“The approach taken in the proposed revisions is to deliver more affordable homes on States-owned land and to allocate private sites specifically for Cat A housing. Is this revised approach more appropriate and workable?”***

##### **Response (91 words):**

- 4.4 As stated at paragraph 4.3 above, with the appropriate zoning of sites the existing Island Plan mechanism should deliver sufficient Category A dwellings. However, the success of this approach relies upon the objective assessment of affordable housing need in the first place (i.e. with unnecessary artificial inflation of annual shortfalls avoided) and the



acceptance by the States that a sufficient amount of land must be allocated to address the objectively assessed affordable housing shortfall. However, please see paragraph 3.8 above in respect of concerns regarding increasing powers to make CPO.

**Question 9:**

***“Are there other measures which should be adopted to address the problem of affordability, including the capture of value from the development of land?”***

**Response (768 words):**

- 4.5 The key measure to address the problem of affordability will be to ensure a sufficient supply of housing land (for both market and affordable housing) to address objectively assessed housing requirements. Where overall housing provision is restricted below that which will be necessary to address housing requirements this will act to worsen affordability.
- 4.6 It was previously the proposed approach in the 2011 Island Plan (unimplemented) Policy H3 to seek to capture the value from the development of land through site by site viability testing in the absence of robust plan level testing. Concerns regarding this approach are set out in detail within the representations prepared by Pioneer on behalf of MS Planning and submitted during the 2011 Island Plan Examination (dated 17<sup>th</sup> March 2010 – Section 3.5 – **ATT3**) and in a further response submitted as a Written Statement in response to the examining Inspector’s ‘Housing Topic Session 3’ question 1 (prepared by Pioneer on behalf of MS Planning and dated 31<sup>st</sup> August 2010).
- 4.7 As stated in Pioneer’s Written Statement in response to the examining Inspector’s ‘Housing Topic Session 3’ question 1 (31<sup>st</sup> August 2010 – **ATT4**), unless land owners are able to obtain what they consider to be a reasonable share in any uplift in land value<sup>14</sup> sites are unlikely to come forward – particularly if it involves a change of use. If this share is unreasonably reduced as a result of inflexible affordable housing and / or other obligation contributions sites will not proceed.
- 4.8 Any other alternative measures would similarly need to be tested to ensure that these can function in tandem with the existing land zoning approach, and to ensure that the release of housing land in line with planned targets is facilitated and remains viable.
- 4.9 As is recognised in the reformed planning system in the UK through the National Planning Policy Framework (“NPPF” – **ATT5** - 27<sup>th</sup> March 2012), the economic impact of policy

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<sup>14</sup> prior to the deduction of affordable housing or other contributions

requirements upon housing land should be viability tested at the Plan making stage<sup>15</sup> to ensure that the housing supply planned to address housing delivery targets remains deliverable.

4.10 The approach applied within the NPPF requires that:

*“...sites and scale of development identified in the plan should not to be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened.”*

The impact of costs associated with ‘any requirements’ including affordable housing, standards and infrastructure, are required to be assessed to ensure that these do not preclude the provision of:

*“...competitive returns to a willing land owner and willing developer to enable the development to be deliverable.”*

(paragraph 173, page 41)

The cumulative impact on development in a Local Authority area of both proposed local standards and any existing Supplementary Planning Document (“SPD”) or policies ‘that support the development plan’ are required to be assessed so as not to put the

*“...implementation of the plan at serious risk, and should facilitate development throughout the economic cycle.”*

(paragraph 174, page 42)

4.11 The NPPF approach sets out that where possible both affordable housing and local standards requirements that will be applied to development should be ‘assessed’ at the Plan making stage and kept under review.<sup>16</sup> On this basis affordable housing and local standards requirements are sought by the NPPF to be assessed on the basis of costs current at the Plan making stage with Plans being reviewed as and when appropriate to reflect changing circumstances.<sup>17</sup>

4.12 A robust assessment of viability of the cumulative impact of policy requirements is not understood to have been undertaken by the States, and, in any event, it is clear that the UK

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<sup>15</sup> paragraph 174 and 177, NPPF

<sup>16</sup> Paragraph 177, page 42, NPPF

<sup>17</sup> Paragraph 153, page 37, NPPF

mechanisms for ensuring housing land supply / affordable housing delivery differ substantially from the Jersey Category A / B housing land zoning approach.

- 4.13 As set out in representations to the 2011 Island Plan<sup>18</sup> the UK policy approach stifles development activity and proves extremely problematic during recessionary cycles, further reducing viability and stifling overall housing supply. Any attempt to impose a 'tax' on land through the capture of land value uplift, untested in terms of Plan level viability, will not facilitate housing delivery in Jersey. However, the existing land zoning system in Jersey ensures that land is identified and zoned specifically for Category A housing, thus guaranteeing the availability of a set amount of affordable housing land supply, and without acting to stifle non-Category A housing delivery.
- 4.14 Coupled with the allocation of category A and B housing sites sufficient to address the objectively assessed overall housing requirement (and which enables economic growth), the existing Jersey system does not require to be complimented by UK approaches.

**Question 10:**

***“Leaving aside the mechanism for delivering affordable housing, is the definition set out in paragraph 6.13 reasonable?”***

**Response (378 words):**

- 4.15 Care should be taken to ensure that the introduction of a definition of affordable housing does not introduce restrictions / complications to the detriment of the State's ability to provide such housing.
- 4.16 Paragraph 1 of the definition should refer to 'rent and purchase' as opposed to limiting rented affordable housing options to a 'social rent' as follows: *'Affordable (i.e. Category A) housing includes homes provided for rent and purchase to specified eligible households whose needs are not met by the commercial housing market.'*
- 4.17 Paragraph 3 sets out that affordable housing 'may be owned and managed' by a housing trust or association. Whilst it may be appropriate to restrict the management of affordable housing to housing trusts or associations, the wording precludes the ability to allow private investment in the ownership of affordable homes. The wording will remove the opportunity to encourage the delivery of affordable housing with the input of private investment (i.e. whereby ownership is retained by a private organisation). There seems little to gain from a

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<sup>18</sup> see paragraph 4.6 above

restriction that may have a negative impact on the ability of the States to ensure that target levels of affordable housing are delivered.

- 4.18 Given that the affordable housing will be provided on land zoned for Category A housing the third paragraph also appears to include unnecessary detail in respect of the retention of housing as affordable housing for future eligible households – presumably under the zoning approach if the ‘zone’ categorisation is made to ‘run with the land’ the only way the dwelling can be lost is if the covenant (or other such mechanism) is removed from a dwelling’s deeds with the permission of the States themselves.
- 4.19 Paragraph four should be moved to under paragraph one.
- 4.20 Paragraph five suggests that standards in excess of normal building standards may be sought for affordable housing through Supplementary Planning Guidance. Increased standards will have financial implications and it is unclear whether the cost of such standards has been tested by the States in terms of its impact upon the potential supply of Category A housing land. Where such impacts are not assessed at the Plan making stage the planned supply of housing land may be rendered undeliverable. Additional development costs should not be introduced or imposed via SPG.

## **5.0 Written Statement: Tenure Split**

### **Question 11:**

***“Is the proposed tenure split (80/20) the most suitable (bearing in mind that the States can adjust this figure in the light of further evidence – 6.100)?”***

### **Response (350 words):**

- 5.1 Explanatory text preceding Question 11 above sets out that the affordable housing tenure split of 80% Social Rent and 20% affordable housing for sale is based on the 2012 Housing Needs Survey (i.e. this is the ‘Jersey Housing Assessment 2013 – 2015’ – “JHA” – **CDBT3**).
- 5.2 However, a review of the conclusions and analysis within the JHA (**CDBT5a**) fails to reveal exactly how the 80/20 affordable housing tenure split has been arrived at. All of the JHA modelling of net tenure requirements refers to: ‘Owner Occupier’, ‘Social Housing’, ‘Private

Rental' and 'Non-Qualified' housing. The 'Social Housing' element is described in a footnote as including 'rental tenure categories'.<sup>19</sup>

- 5.3 If affordable housing for sale is included within the 'Owner Occupier' element of housing, a breakdown of net requirements for the affordable home ownership part of this is not provided. It is therefore unclear how a robust net rented / sale affordable housing tenure split requirement can have been derived, and it cannot be confirmed on the basis of the States' housing needs evidence that the proposed 80/20 tenure split is the most suitable.
- 5.4 Given the likely impact of affordable housing tenure requirements upon the viability of Category A sites, and the need to ensure that future affordable housing supply addresses tenure specific shortfalls as opposed to increasing them, it is important for such matters to be robustly evidenced and set at the Plan making stage.
- 5.5 It is noted from the Ministers Response to the 2011 Interim Island Plan Review (November 2013 – **ATT2**) that there are significant objection by respondents to the 80/20 tenure split proposed by the Minister.<sup>20</sup> This, in combination with the lack of a robust evidential basis for the proposals, suggests that this matter needs to be re-visited by the States. A clear objective analysis of affordable housing requirements should be presented by the States as a Core Document for consideration and comment demonstrating what would represent an appropriate affordable housing tenure split before this approach is imposed, and wording should enable a target tenure split to flex within parameters in response to local and site specific circumstances.

**Question 11a:**

***“Does the Plan deal adequately with the need for lifetime homes/housing for the over 55s? Is the role of the Parishes and that of the States clear in this respect?”***

**Response (109 words)**

- 5.6 Any proposal to amend the Interim IP to impose additional standards such as Lifetime Homes / housing for people over 55s (which incurs significant additional costs as a result of increased specifications and land take) should be founded upon an objective assessment for the level of need of such accommodation and of the impact on the viability of the planned housing land supply. Without such assessments having been undertaken it is not possible to draw robust conclusions on the adequacy of the Plan approach. It is unclear

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<sup>19</sup> page 9, JHA

<sup>20</sup> pages 46 to 47, Ministers Response to the 2011 Interim Island Plan Review, Volume 1 (November 2013)

that any such assessments have been undertaken. As such, the application of the Lifetime Homes standard should remain a voluntary matter.

**Question 12:**

***“Leaving aside the tenure split and the specific sites proposed in H5, are there any comments on the changes proposed to policies H4 5 or 6?”***

**Response (351 words)**

5.7 Policy H4:

- i) The 2013-15 Jersey Housing Needs Assessment (“JHA” – **CDBT3**) to which supporting text (paragraph 6.113) to the draft amended Policy H4 refers reviews future surpluses and shortfalls in housing but does not assess backlog housing requirements.
- ii) The JHA (**CDBT5a**) relies on the assessed mover ‘intentions’ of households over the three years 2013 to 2015 and affordability assumptions – there does not appear to be any triangulation through a review of past mover trends to ensure that the conclusions of the JHA reflect a balanced view of what choices households are likely to make in practice. The approach does not reflect that a proportion of households may choose to spend more on their housing costs than the levels set within the JHA where this enables them to access non-States housing options.
- iii) The lack of clarity in the JHA assessment of affordable housing tenure will impact upon the reliability of the housing mix conclusions, and how these apply to specific tenures.
- iv) Having regard to the above concerns when housing mix proposals are considered these should be determined through a process of negotiation with developers – imposing inflexible housing mix requirements upon open market housing proposals that developers consider they will have difficulty marketing will prevent housing land being developed. This will stifle overall housing delivery and worsen affordability and overall backlog requirements. The wording should make it clear that housing mix proposals will be agreed subject to negotiation in the light of an up to date and objective assessment of housing requirements.

5.8 Policy H5:

- i) The proposal to enable additional affordable housing to be brought forwards through Village Plans will need to be subject to careful scrutiny to ensure that these are used to facilitate as opposed to restrict housing provision, thus reducing the States' ability to address overall housing requirements.
- ii) It is unclear why the policy restricts housing provision to solely affordable housing; additional affordable housing to address objectively assessed housing requirements may be more forthcoming in rural centres where this is accompanied by a small element of market (Category B) housing thus encouraging private investment.