



PLANNING & ENVIRONMENT DEPARTMENT

Draft Island Plan – White Paper

Housing

Minister's Response to consultation

27th May 2010

Ref	Agent	Name	Org/bus.	No.	Title	Response	Suggested changes to the document:	Why you consider this to be necessary:	General Response	Detailed Officer Response	Minister's Recommendation
Housing											
DP12		Miss Lynda Firkins		6	Housing	Neither	I am now 44 years of age and have lived and worked in Jersey for 25years and still unable to afford a home. I have never in that time not worked and always earned my own money and even now having my own place to call home is unreachable. Earning £30,000 a year and lending 5 times my wage only comes to £150,000 all that is on offer are studio's for even more than £150,000. I lived in one room for 18yrs before I got my qualifications and so refuse to do so again. Why is my only option and awful spectrum apartment in town or small studio, can housing not build affordable places outside of town with outside areas to relax in after a hard days work, we do not all want to live in St.Helier but it is the only place we are getting squeezed into. A great example of architecture, thought and price was the Palms at Portelet and nice out of town location, roomy apartments with a small decked area and start off prices of £170,000. All new housing outside of St.Helier seems to be luxury?	Nicer affordable developments for single mature caring adults need to be considered, we are part of the life blood of this island the working class and shortly we are all entitled to have a place to call home. I even missed out on children because every place I have rented stipulated no children, no pets, no smoking etc. I have 4 sets of friends where the woman and child have moved to the U.K to place the child into nursery as they can't afford to do it here and the guy's have stayed on here to work and they just visit each other as and when, what type of society splits up families in this way and causes woman not to have children because they can't afford to keep themselves and the child. It really is a frustrating situation and not good for our future generations	Noted		Noted by the Minister
DP240		Dr Luke Shobbrook		6	Housing	Neither	We would like to take the opportunity to input into the Island Plan consultation. The Island Plan cannot be seen in isolation. It has been encouraging to see the debate on housing stimulated by Scrutiny. It is a major policy area where relentless free market economics impacts significantly on quality of life in a small island community. It appears that current population control and housing regulation are struggling to deal with the tension between the two. We have both worked at the sharp end of an increasingly deregulated and private ownership orientated housing system in the UK. General policies there have allowed the unprecedented transfer of wealth from the young to older property owners thanks to soaring house prices. Our experience has taught us that adequate housing is not only a fundamental human right, it also impacts on mental health, the strength and permanence of communities, quality of life, child development and a basic human need to belong. It is too important to be left to the unregulated free market. A well intentioned policy of increasing the housing supply in Jersey has in our experience translated into developments of mixed quality flats, often with little regard for families and the community needs of those living in them. Poor soundproofing is a big issue with Health Protection and building standards too weak to deal with the issue. The recent house price index indicated that two bed flats have stabilized in value		Comments noted	The Housing in Rural Centres is aimed at achieving many of the points raised in the comments above, in particular housing sites developed by the local communities to maintain local vitality.	Noted by the Minister

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							overall, further increasing the relative price of family houses and effectively trapping some families in unsuitable accommodation. We would like to suggest an alternative that puts control of development firmly in the hands of the local community and the States elected to serve them, away from property development companies legally obliged to maximise profit for their shareholders. The idea also works to minimise the environmental impact of increasing population. The Island Plan could allow for the rezoning of land (brownfield sites) in small pockets throughout the parishes exclusively for sustainable, self build development by local individuals and families with parish links. Food security is an increasing issue and the presumption must be that green field agricultural land must not be developed as seems to be acknowledged (even for 'horse stabling' which has appeared like a rash in St Martins and often lies unused presumably waiting to take advantage of planning creep). Rezoned brownfield sites could be sold only to the States or Parish at market price and then sold on to those individuals and families with the requirement that any development meet strict sustainability criteria and be achieved through close collaboration with the Planning and Building control departments, local trade's people and architects. Low cost approaches to sustainable development include passive solar gain, car sharing, grey water recycling and low embodied energy insulation. These small, human scale developments would incorporate two bed roomed cottages and three or four bed roomed family homes. They would be environmentally sensitive and sustainable in terms of water and energy use. They could be used to educate and inspire other environmentally sensitive building projects. These developments would also provide for families, older and young people who want to live in mixed communities not enclaves. In return for local sustainable building expertise co-opted by the States and States bulk purchasing power a sliding scale shared equity arrangement could be put in place, the amount of equity held by the States decreasing incrementally over time. The element of shared equity will help to encourage commitment to a community or provide funds to invest in housing provision for people who need help. Consideration needs to be given to mechanisms to ensure that family housing stock is not lost as will happen with right to buy. These could include selling on to first time house buyers only. A crucial element of the idea is that it would allow people to choose to be time rich				

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							but still be able to house themselves independently. They will not have to spend their time working to service a huge mortgage or rent liability but instead can invest their time in developing a home they can love living in that minimises resource use and carbon production and becomes an ongoing community resource. Happiness research, summarized by the economist Richard Layard in his recent book 'Happiness: Lessons from a New Science' (2005), has shown that sacrificing the majority of your time to accumulate more wealth after basic needs are met does not significantly increase happiness. This is different to wanting to progress and develop in work you love where motivation is intrinsic and the financial reward is often not as great. A desperately important part of giving families more choice in how to spend their time is the impact on the care of children. Recent reports show that women in Jersey often have to delay motherhood until their late 30s, past the optimum time. When the baby arrives there is often financial or contractual pressure on both parents to return to work as soon as possible. Investing time in children is beyond price. Research has shown that a quality one on one bond during the first three years of life has a profound effect on an infant's brain development and emotional well being that persists into adulthood. Poor quality, inconsistent care can severely impair development and leave the worst affected in a permanent state of anxiety and stress. This research is covered in detail in by S. Gerhardt in 'Why Love matters' (2004) ' the kind of brain that each baby develops is the brain that comes out of his or her particular experiences with people'p42 . This has huge implications for future social policy. Housing and planning policy has a fundamental part to play in happiness now and in the future.				
DP348		Mr Martin Whitley		6	Housing	Neither	The document should recognise development in progress.	It would seem inadvisable to agree policy and proposal for change in the middle of development that could have been adapted to match the new plan. The development of Field 605, St John is likely to be built at about the time the new island plan introduces common sense to development. Surely it would make sense to suspend major developments during the consultation period.	Noted	All planning applications are judged against the policies of the day and once approved, revised policies such as those contained in this plan, cannot be applied retrospectively, unless a substantial revision or change in the application is needed to be made through a new application.	Noted by the Minister
DP395		Vallois		6	Housing	Neither	To add in to H1 the area of Anne Court as per proposition agreed by the states from Deputy Martin with regards to Social Housing for that site therefore a designated area of Category A housing.		Reject	Ann Court is within States ownership and is the subject of development proposals as part of the North of Town Masterplan: there is thus no requirement to rezone the land for Category A	The Minister is not minded to amend the draft Plan as the issue raised is already adequately

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										housing as this will be material to the North of Town Masterplan.	addressed
DP396		Vallois		6	Housing	Objecting	To remove No 4 on policy H1 to not allow development on Longueville Nurseries	Longstanding issues with consistent building within districts of St Saviour whereby a large amount of development has gone up over the years and the traffic issues have not been taken properly into account. This area is largely populated, large amounts of traffic in particular with regards Rue Des Pres trading estate. Parking issues surrounding the area already and blind corner for accessibility.	Objection noted	The Plan highlighted a need for 1000 category A homes, the majority of which are planned to be developed within the existing built up areas. A small number of sites (7) were identified to provide around 200 family style Category A homes that could not easily be provided within the built up areas. These 7 sites were selected because they met with strict planning selection criteria including; that they fitted well within the existing built up area and met with the revised spatial strategy policies for the island, did not cause any significant visual or environmental harm, were near good transport network/bus routes/schools/shops and, where possible, were brownfield sites. This site met with all of these criteria and was also highlighted in the 2002 Island Plan as a future category A housing site. The removal of this site will reduce the supply of category A family homes and alternative provision will need to be found in order to ensure adequate overall supply of these types of homes on the Island is met. However, this site is not supported by the Parish of St. Saviour and the Minister for Planning & Environment has given an undertaking that any site not supported by the relevant Parish will be withdrawn from the draft Plan. Accordingly this site has been withdrawn and so the request to remove this site is therefore supported by the Minister.	Minister minded to support request to remove site from Plan.
DP662		Conneta ble Peter Hanning	Parish of St Saviour	6	Housing	Objecting	I would submit that this Parish has already contributed more than its fair proportion of all categories of housing. Indeed, we currently have large concentrations of (States) social rented flats and housing estates, and the prospect of a mixed tenure Retirement Village which will largely satisfy the		Objection Noted	The Plan highlighted a need for 1000 category A homes, the majority of which are planned to be developed within the existing built up areas. A small number of sites (7) were identified to	Minister minded to support request to remove site from Plan.

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							current life-long retirement needs of the Island. This project on re-zoned land at Chasse Brunet (George Carter) is expected to yield 98 open market and 80 social rent dwellings for the over 55's and a 75 bed residential care and dementia home. The redundant JMMB Dairy site will contribute a further 70+ dwellings. However, in respect of this application , any proposal to extend the development into the green zone southerly pasture must be firmly resisted as this will only encourage further applications to infill on open fields on either side. I take great issue with the inclusion of (BA) Longueville Nurseries in the Draft Housing Development Briefs. I must object in the strongest possible terms to rezoning this land for Category A Housing. To develop between 10 to 15 dwellings would cause significant traffic implications. The existing narrow by-road would struggle to service that many new homes as well as the existing properties therealong. The merger onto Longueville Road is also problematic to say the least, and would add further strain to the tailbacks that frequently occur outside of the Trading Estate. This is a 'field too far' and a line must be drawn to arrest further incursions into the countryside. I take comfort in your publicly expressed announcement that you would be minded not to entertain development proposals that were opposed by the Connetables and I earnestly hope you will honour that assurance in this particular case. As I have said, we have already contributed greatly over recent years in additional housing stock and there will still be further pocket re-developments that will continue to augment the supply chain. Given that certain Connetables in rural Parishes have expressed a desire to expand their village communities to encourage more vibrancy and first time buyer potential, I would say that, in the event, such aspirations would most certainly lessen the strain on the pressure points in this Parish. The 'built environment' must be supported by a sound infrastructure. It cannot, by any means, be said that this is the case in St. Saviour. I would hope therefore that this will be recognised and addressed in the 2009 Island Plan Review in order to safeguard the environmental and infrastructural well being of this Parish				
DP680		Mrs Sue Lissenden		6	Housing	Neither	Housing. Here I change gear and bring in some personal experience. We have to down-size after 43 years in one place. We have taken a year to look around available houses on the island. As a result we have seen for ourselves the huge amount of housing development since we first came to the island. At the same time, because the market is sluggish, there are		Noted	There is clear evidence of need for the provision of affordable homes over the Plan period and also evidence of need for specific types of housing accommodation and it is incumbent upon the Minister for Planning and	The Minister notes the comments made but is not minded to amend the draft Plan

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							very many houses static on the market. This mismatch cries out for some sort of re-think, though I cannot see the answer. That is not surprising and it does not mean there is no answer to be found. May I suggest a pause in the building programme, an inventory of both need and supply a cross the whole range, and a complete re-think? The need to keep the construction industry happy has been a sudden imperative in island thinking; is it valid? Everything, except hard-and-fast trade union thought, is changing fast. This is where those two sisters Prudence and Patience should be consulted.			Environment to ensure a provision of land and buildings to meet this demand, particularly when it will be some time before any homes to be procured under the auspices of the new Plan are developed and completed.	
DP683		Pauline Harewood		6	Housing	Objecting	We should under no circumstances build on green agricultural fields - or even undermine wild green areas with housing - or on greenhouse sites as this is still good agricultural land - even if it is uneconomical to heat these greenhouses alternative crops should be grown	To save our countryside and rural aspect both for locals and visitors.	Noted		Noted by the Minister
DP745		Paul Harding	The Association of Jersey Architects	6	Housing	Objecting	10.1 The 2009 Draft Plan recognises the Plan is unlikely to make proper provision for Islanders housing needs, warning in para 4.10 (bold type as used in the Plan) that " It needs to be clearly recognised, however, that unless land in the Built up Area is developed at higher and more land efficient densities than have previously been achieved, in accordance with the strategic policies of the Plan (Policy SP 2 'Efficient Use of Resources'), it will not be possible to meet all the Island's identified needs, particularly for housing, without reviewing the need to release greenfield sites for development during the Plan period. " This indicates the density of development within Built-Up areas will have to dramatically increase to satisfy the Plan policies, overcoming other policies within the 2009 Draft Island Plan such as building height, Green Backdrop and skyline. 10.2 The concentration and intensification of all development within St Helier risks further polarising serious social divides (the have's in country houses with have not's in dense urban areas) and causing harmful damage denying our younger locals the opportunity of ever owning their own home. This approach was tried out in the 1960's with the urban high-rise developments, resulting in social problems. 10.3 There are glyph maps incorporated into the 2009 Draft Plan for virtually all demarcated zones / areas, except one delineating the proposed Built-Up area extent. This is contained within the stakeholders presentation and the lessons we learn from it are so important we reproduce it (by permission from Planning and Environment Department) herein:? 10.4 It is apparent, although the principal Built-Up areas within		comments noted	The concentration of new development into existing built up areas and the protection of the countryside is a key component of the new draft plan and one that should not be watered down, unless through the monitoring regime proposed there is evidence that the policies are failing to provide the housing and other land use requirements identified in the Plan.	Noted by the Minister

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							<p>the Island extend across large parts of the south coast, they actually form a small proportion of the Island's land extent. By a large margin Jersey substantially retains its countryside and green, natural spaces. It is also equally apparent the Built-Up area is quite fragmented in places and in other locations rather irrational. 10.5 Although regenerating St Helier is an admirable objective it cannot be the only answer to stack up the housing in Town with increased density. This is not the answer to every built requirement. We know young Jersey persons aspire to a conventional home with garden and if this cannot be achieved on the Island they are prepared to leave Jersey for other shores. This is undoubtedly not good for our future. 9.6 In its current guise the policies concentrating and intensifying development in St Helier is too dogmatic. It risks creating a whole new set of demographic and sociological problems. We need to look harder at edges of the Built-Up area and brown-field sites. There has to be a more balanced approach. 10.7 The AJA submits there is potential for a Multi-Centric approach to the Built-Up Area, where distinct neighbourhoods are identified (within St Helier and elsewhere within the Built-Up Areas) and contain: a) Distinct neighbourhoods within the Built-Up areas are identified. b) Each would be 10/15 minutes walk in any direction, to give an accessible size on foot. c) Each would have at least one public Open Space. d) All will be connected with public transport links. e) Each will have a viable mix of uses including shops, offices, other employment uses and housing. f) Adequate public / private transport and parking provision including car-share and bicycles. g) Strategy for enhancing public realm space and character qualities. 10.8 We propose that serious consideration need to be given to : a) Rationalising the Built-Up area boundaries, and b) Consolidating the Built-Up area boundaries, and c) The benefits of appropriate reclamation. It is Jersey's tradition to reclaim land for our built environment requirements. 10.10 All this could be achieved without adversely impacting on our countryside or shoreline. Jersey's heartland countryside, green and natural spaces must be conserved and enhanced at all costs. The AJA believes the balance of Built-Up area and Green Zone needs reworking.</p>				
DP155		Mr Stephen de Gruchy			H: Introduction	Neither	Paragraph 6.6 appears to have the incorrect residential qualification period. A Housing Dept webpage says it is o 10 years aggregated residence for persons born locally, or o 11 years continuous residence for someone born outside the Island.		Agree	Paragraph 6.6 to be amended to reflect current Housing qualification period	Minister minded to amend plan

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DP791		Senator Terry Le Main	States of Jersey Housing Department		H: Introduction	Neither	Evidential Basis On a general point, the plan relies heavily on the findings of the 2007 Housing Needs Survey. That survey did not measure actual need or even what is reasonably achievable given an individual's financial means and the results must be treated with caution and not relied on as solely demonstrating the Housing needs of our population. It is also worth keeping in mind that the survey which was carried out late in 2007 pre-dates the current economic difficulties which have doubtless altered the realistic purchasing potential of many aspiring buyers. For others, particularly those renting in the private sector there may be a greater motivation now to look to the social rented sector for a better housing deal. This is a very important point and one which has significant relevance for the Plan, as drafted, in its approach to Category A Housing. Our population is changing in other ways; we are of course, as is now well established, getting older, but also as an Island we have a significant reliance on 'Key Workers' migrating to the Island to provide those services vital to our continued success. No more important is this than in our Health Service where issues of access to accommodation and relative affordability are having a significant impact on the recruitment and retention of nursing staff.		The Housing Minister's comments are noted.	The plan recognises these points. Currently the 2007 is the only statistically reliable source of evidence. Recent discussions with Duncan Gibaut from the States Statistics Office, confirms that the overall demand numbers are still relevant and with regard to need housing, even more so, given the current economic climate.	Noted by the Minister
DP156		Mr Stephen de Gruchy		Objective H 1	Housing Objectives	Supporting			support noted		Support is noted by the Minister
DP347		Mrs Penelope Lee		Objective H 1	Housing Objectives	Objecting	Currently there seems to be an oversupply of new property, both cheaper flats to expensive houses. Perhaps there could be a study of why these are not selling before building yet more		The current build rates on average are equitable to past rates and trends. The supply of homes has been estimated to match the estimated demand over the plan period.		Noted by the Minister

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									The supply of homes is not an instant on or off switch as it takes time to plan and build new homes. Therefore , although this Consultee perceives there to be a current over supply, (which could be down to the present financial difficulties caused by the Banks restricting lending to prospective purchasers), the demand levels will balance this supply over time.		
DP1056		Ray Shead	The Jersey Chamber of Commerce	Indicator s H 1	Housing Indicators	Objecting	The quality of environmental impact should be a fundamental part of the process. Some key sustainability parameters should be set.		Noted		Noted by the Minister
DP100		Mr John	Council		Demand	Objecting	In the section on housing individual members of the		A large		Noted by the

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9		Mesch	for the Protecti on of Jersey's Heritage		for Homes		Council have expressed concerns about the reliability of the figures used in predicting housing needs. The draft plan states at paragraph 6.25 that the findings of a survey based on the aspirations of the individuals done in 2007 "are still robust". The requirements for social housing should be based on an assessment of real need, not the unbounded aspiration of a small population sample. To illustrate this point, it has never been explained why predicted figures of social sheltered housing needs include 57 people who will still be under the present normal retirement age in more than ten years time, outside the stated planning period		sample of over 10,150 private households (including all States tenants) was randomly selected. Within this sample there were a number of ineligible addresses (e.g. businesses or unoccupied dwellings) meaning the total number of eligible addresses was 10,000. Of these eligible addresses some households refused or were unable to complete the survey. A total of 5,548 private households complete		Minister

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									d this voluntary postal survey, giving an overall excellent response rate of 56% and thereby providing a large and robust set of data for analysis.		
DP1185		Valerie Harding			Demand for Homes	Objecting	The plan sets out the need for 4000 new housing units in the island over the next ten years. Firstly this figure is estimated and perhaps further information should be given to the public as to how this was reached. Who is going to live/buy 4000 units of housing? The figure makes no sense - Jersey is only 45 square miles. Paragraph 6.20 mentions fertility and morbidity (the latter means diseased; sickty - are we going to have a plague? Surely it should read mortality (frequency or number of deaths). Allowing for immigration of 150 per year that is only 1150 individuals over ten years and if each has a new housing unit then there is only a need for 1150 (the size of t he individuals family is irrelevant for the purposes of estimating the number of units needed, t he size of the family is relevant to the size of the unit i.e. two children three bed roomed unit etc) . This is partly covered in 6.21. 6.26 mentions 1000 households have housing aspirations. We all have housing aspirations but if you cannot afford it you do not buy it . People who have aspirations in life usual work hard and earn to achieve their aspirations or part thereof . The type of housing going to be developed are not mansions. Families living in States rented accommodation whose income is above the threshold would have moved by now if they were "aspired" to do so. They are probably happy living where they do. Social housing is usually built to an inferior quality and standard - another UK development idea - smaller rooms i.e. rabbit hutches. 6.91 says "information on the numbers of households who are in need of affordable housing is not clear" so why all t he rush to build 4000 units over 10 years.		Reject	Population model: the Statistics Unit have used a population model, to provide estimates of the population and estimates of housing. This is set out in the draft Plan at 6.18-6.23. Housing aspirations: the Housing Needs Survey sought to take into account the extent to which people's housing aspirations were realistic.	The Minister notes the comments made but is not minded to amend the draft Plan as the issues raised are adequately addressed
DP394		Vallois			Demand	Objecting	To assess the real underlying issues of housing	Over many years in Jersey there has always been	Comment		Noted by the

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					for Homes		demand and affordability and identify how planning policies increase price of property within a small infrastructure such as Jersey	an apparent necessity to enable more people to purchase homes within the Island however, never addressing the real concerns and issues that economic activity has on the already resident population especially over the last 5 year period. Just by setting up new schemes every 5 / 10 years will not tackle the head on problem the Island are facing with respect to home owning aspirations. 6.14 states the difference between category A and category B housing needs however, on page 235 of the plan it states that Cat A (which is for over 55's) a requirement of only 550 and Category B would be 2000. How is this addressing the strategic plan policy of the ageing population?	s noted Cat A housing however consists of not just over 55's housing but rather: States, Parish and Housing Trust rental housing (which can include sheltered housing); lifelong homes (for people over 55) on sites specifically zoned for this purpose; homes for first time buyers; 'Jersey Homebuy ' housing, which is housing sold at a discounted price and allocated through the Affordable Housing Gateway based on		Minister

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									a financial means test. The total estimated requirement as evidenced through need is a total of 1000 CAT A homes over the Plan period. homes, which is 25% of the proposed new housing supply.		
DP577		Deputy John Le Fondre			Demand for Homes	Neither	Housing - Categories and affordability - the statistics quoted in the draft plan as to affordability of housing are unsurprising but equally quite shocking. A FTB house of £450k - £500k cannot be sustainable. I am also unclear as to whether Homebuy as presently constituted 'locks' people into that type of accommodation with little prospect of being able to move up the property ladder. That may well not be an immediate concern, however might be a longer term consideration. Equally, the designation of sheltered accommodation (e.g. for 'over 55's) does raise medium term considerations as to how it can be controlled, 2 or 3 owners from now. If someone dies and leaves their home to their children (or grandchildren) are we seriously stating that someone younger than 55 cannot stay in them ? In addition I continue to believe that we do still construct the wrong type of accommodation. The point was made many years ago in the Housing Forum that other jurisdictions had better mixes of accommodation. We used to have (and I believe still do have) too many studio and one bedroom units. Sheltered housing is now moving towards "1 ½" bedroom units. This does not lend itself to future medium term flexibility in the use of accommodation. If an elderly couple has 2 bedroom accommodation it means they can have grandchildren to stay, a carer to stay, more incentive to downsize to such a unit, the ability to sleep apart if		Noted	The cost of home ownership is indeed shocking and hence the development of policies aimed at providing more affordable homes through Jersey home buy for example. Both Jersey Home Buy and over 55's accommodation can only be sold to new owners who qualify for those categories in order to maintain this stock of housing. The new housing mix policy (H5) is aimed at delivering a more relevant mix of housing to the market, based upon needs.	Noted by the Minister

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							one or other is ill etc. When they eventually die, a 2 bedroom unit is of much more use (particularly if well designed, with good amenity space) to other potential users (e.g. young couple with first child), or to other types of family units. Yet we persist in allowing one bedroom accommodation to be constructed, which is surely an inefficient use of our valuable land.				
DP781		Senator Terry Le Main	States of Jersey Housing Department		Demand for Homes	Neither	<p>Category A - Need Housing Paragraph 6.14 There is evidence of a growing problem with the housing of key workers particularly at Health where there has been a significant shift in the housing needs of migrant nursing staff. This should perhaps be referenced here. Paragraph 6.17 This raises the question of the base data on which we make many of our planning and land use assumptions. In that respect it is of concern that we have less than optimal data on the size and make up of our population. We have had the benefit of a number of proportional Housing Needs Surveys which have been useful in estimating housing aspirations, they have though done little to define 'actual need'. An Island-Wide census, presently planned for 2011 is an essential step in defining the base line data necessary for long term robust land use policy. Beyond that it is the Affordable Housing Gateway which will need to be the single access point for all affordable housing applications, whether they are applications for States social housing, Jersey Homebuy, Housing Trust homes or Parish provided social housing. This gateway has been promoted by the Housing Department and set as a key activity under Aim 14 of the new States Strategic Plan. The gateway will bring together the application, means testing and waiting list processes from all of the disparate social housing providers. In this way there would at least be consistency across the piece regarding who can access social housing and could ensure that existing and future stock is targeted to deliver maximum benefit. As the gateway would be the single access point for all affordable housing (affordable housing to buy as well as to rent) there would be an up to date list of those requiring affordable housing, their circumstances and financial means that would allow planners and policy makers access to good robust data. For a jurisdiction such as ours this is a real prize. Paragraphs 6.32 - 6.36 We still have Category A sites from the 2002 Island Plan which have not been developed. That cannot be acceptable when they were by definition approved for Category A use in order to meet the needs of the population. This trend of delays in delivering Category A homes on approved sites has continued</p>		The comments of the Housing Minister are noted	6.14 This has emerged since the completion of the draft plan and will be updated to reflect the change in circumstances 6.17 the new census in 2011 and the formation of the gateway are essential components to having a fuller and more up to date understanding of housing needs. 6.32 noted	Noted by the Minister

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							with significant delays being experienced in the delivery of the vast majority of the 300 homes on the sites approved with P75.2008. Work has only commenced on 2 very small Parish sites. Whilst I know that proposals are now coming forward for some of the other sites, we are approaching 2 years on since zoning and it will be almost another 2 years before we will see any significant number of homes.				
DP101 1		Mr John Mesch	Council for the Protection of Jersey's Heritage		Supply of Homes	Objecting	12. The relentless release of agricultural land to new residential development is a constant source of great concern to the Council. The Council is disappointed that a previous recommendation of ours that a policy of relocating industrial sites to the new La Collette reclamation area has not received the consideration we believe it deserves. If industrial sites such as the Rue des Pres Trading Estate and Norman's site at Five Oaks were relocated to the harbour area not only would land be released for residential development in areas well served by roads, shops, bus routes and other public facilities but polluting and road damaging heavy lorry traffic through surrounding built up areas would be greatly reduced. This recommendation is in complete accordance with the draft Spatial Strategies SP 1 and SP 2..		Reject	There are very strong policies in this (NE5 (green zone), NE6 (Coastal National Park) ERE1 (Safeguarding Agricultural Land) and previous plans that seek to protect agricultural fields from development. There is not enough space or capacity to move all of the industrial sites identified by the Consultee to La Collette. In addition, the development of La Collette will be restricted by the findings of the Buncefield report which limits the development potential.	The Minister is not minded to amend the draft Plan
DP918		mr daniel wimberley			Supply of Homes	Neither		The Esplanade Quarter is still presented as a possibility, no, as a certainty or assumption. The Plan clearly should spell out its potential as a Housing site, or at the least make clear that there is a Plan B if the Esplanade Quarter does not proceed as 600,000 square feet of offices etc. as planned	The current approved master plan for esplanade quarter is predominantly for office accommodation with some residential units. A 'Plan B' is something that cannot be relied upon for purposes of estimating future housing supply at		Noted by the Minister

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									this time.		
DP578		Deputy John Le Fondre		Table 6.2	Supply of Homes 2009-18	Neither	Housing Stock Refurbishment - the plan talks about making better use of land, increased densities etc. Yet this part talks about a net reduction of 300 homes due to refurbishment of stock. Surely these sites should be reviewed independently to assess whether better use could be made of the land, perhaps by going higher or by a more efficient utilisation of the land? I am certainly aware of a couple of schemes where (in my view - as a layman) it would seem possible and desirable to increase the density being applied to the site.		Deputy le Fondre's comments are noted.	The reduction in numbers is primarily due to the Housing Department's proposals to merge substandard bedsits and 1 bedroom flats to provide better quality 1 and 2 bedroom flats	Noted by the Minister
DP579		Deputy John Le Fondre			Provision of Homes	Neither	Provision of Homes - the previous plan introduced the concept of the 45 / 55 split between (initially) social rented . FTB accommodation. My understanding is that these draft proposals include various variations on possible percentage splits. These need to be very carefully assessed. Even with a 45 / 55 split the sheer cost of producing social rented accommodation does challenge the viability of schemes at times. If this viability is further challenged the impact upon schemes may mean they just will not be constructed. This therefore needs careful appraisal, possibly in conjunction with Property Holdings who can give an objective assessment of the impact upon the viability of particular schemes. As regards social rented accommodation, it is unclear from the Whitehead report (commissioned by the Housing Department) as to what the present requirement is. That report expressly states that there must be concern about [an existing] policy that envisages a decline in the scale of the social sector and increasing emphasis on the provision of accommodation for older households. [Page 20 - summary of main report]. It also notes that various pieces of data are required to properly understand the market etc. Accordingly I believe that there is likely to be a requirement for good quality rental accommodation (both social and otherwise), and that this may need to be factored into the draft proposals.		Comments noted	The requirement for social rental accommodation is one that has only emerged since the release of the draft plan and on-going discussions are taking place with the Housing Department to bottom out the requirements as part of the evidence base.	Noted by the Minister
DP782		Senator Terry Le Main	States of Jersey Housing Department		Provision of Homes	Objecting	Affordable Housing Paragraph 6.64 The Island Plan 2002 was very successful in delivering affordable housing. The 45:55 arrangement that it introduced worked so well primarily because it focused on green field sites where the switch to residential (even Category A) use led to a material increase in land values. This made the requirement to produce generally 45% of the homes for social rented and the remainder restricted to first time buyers palatable for both developers and land owners alike. Evidence of this is in the very small number of those sites still left undeveloped. The new proposals are for 40% of		The Housing Minister's comments are noted	The plan allows for a viability assessment to be undertaken ensuring that the proportion of affordable housing delivered within the target figure does not render a development unviable.	The Minister is likely to reduce the proportion to 12.5% for the first year, rising to 20% by year 5 and the threshold site size to remain at 2 homes and above. For developments

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							homes on sites over 6 units to be affordable. Where this will apply to Green fields I do think that it is over generous as it represents a backward step from the 45% achieved hitherto. I would suggest that the ratio's be reversed for Green Field sites and 55% of the homes made affordable (either social rented, Jersey Homebuy or life-long homes or most likely a combination of the three) and 45% for first time buyers. Where I have real concerns for the affordable housing proposals is in respect of its application on brown field sites. Such land has an intrinsically higher value leaving developers much smaller margin for profit. I am concerned that maintaining the requirement at the suggested level will lead to sites not being developed because they are not financially viable and we will miss out on valuable opportunities for the regeneration of our existing urban centres, principally in St Helier. The policy adopted as drafted could see:- 1. Urban site values reducing, this would affect sites in States ownership too 2. A lack of financial viability could restrict developments 3. Development process could slow whilst complex financial modelling and negotiations take place on the viability of sites and the levels of commuted payments to be made if that is applicable 4. An increased administrative burden on the Planning Department or others together with increased costs at a time when our Public sector is under pressure to reduce its costs and staffing levels.				with a capacity of two-eight units of accommodation the affordable housing contribution may be made in the form of a commuted sum payment to enable the delivery of affordable homes off-site, elsewhere.
DP1057		Ray Shead	The Jersey Chamber of Commerce	Proposal 16	Provision of Homes	Neither	The release of land and density of development is essential to maintain Jersey's image and retain its rural/urban identity.		Support		Noted by the Minister
DP158		Mr Stephen de Gruchy		Proposal 16	Provision of Homes	Supporting					Noted by the Minister
DP783		Senator Terry Le Main	States of Jersey Housing Department	Proposal 16	Provision of Homes	Objecting	Proposal 16 The estimate of new Category A homes to be provided over the plan period seems to be inadequate on two fronts. 1. It assumes that all of the outstanding approved sites will be developed and as we already know there are still H2 sites which have not been brought forward and development of other approved sites is worryingly slow. 2. It does not take account of the inadequacies of significant proportions of the existing Category A stock, particularly in the social housing sector where significant proportions of the accommodation, which on size alone appear to meet the needs of older persons fail to do so because of issues such as access.		The comments of the Housing Minister are noted	1. Noted 2. The re-development of existing stock is included in the 300 outworn housing sites figure in table 6.2	Noted by the Minister

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DP421		Mr Marc Burton	Institute of Directors		Meeting Housing Needs	Neither	Further consideration needs to be given to defining other sites on the perimeter of St. Helier and, as we have said previously, in the country parishes. See attached letter	The plan almost assumes current and future generations require flats to live in but in reality we all aspire to have a house, garden and parking for cars with good areas for children. European style living may not suit everyone in Jersey and consideration must be given to 'families' by providing alternative development opportunities. Without the influx of young families into the country parishes, country areas may lose amenities and services and country schools may be at risk. In addition, the provision of a range of housing will be required to suit the economy and attract educated and skilled workers we will require in the future;	The comments are noted	The strategy for providing new homes is that they should be built within the Island's already built up areas. The designation of green field sites around St helier, specifically for affordable housing, has been kept to a minimum. The proposed designated sites are intended to deliver affordable housing in the short term, before Policy H3 becomes fully effective.	the Minister will only consider additional sites if the proposed sites are not designated for affordable housing.
DP545		Mr Paul Harding	The Association of Jersey Architects		Meeting Housing Needs	Objecting	Previous Island Plans have proposed specific Green Zone sites for rezoning, resulting with arguments about countryside erosion and value. This has been a 'pepper?pot' approach to providing our built area requirements, relying on accuracy of forecasts and anticipated site yields. As soon as land is proposed for rezoning it's value shoots skywards increasing end housing cost. The AJA submits an overview needs to be established with a new 'Consolidation Zone' being widely drawn around the Builtup area (based on the review of the Spatial Strategy proposed by the AJA) that does not count as rezoning but identifying areas within which Planning will identify specific sites that may be suitable for future housing. The States should then agree a site value with these owners more reflecting a slightly enhanced agricultural value than residential land. Where such an agreement has been reached Planning and the States can then, over a period of decades, bring them forward for including in the Built-Up area and tender the sites for housing provision.	All this could be achieved without adversely impacting on our countryside or shoreline. Jersey's heartland countryside, green and natural spaces must be conserved and enhanced at all costs. The AJA believes the balance of Built-Up area and Green Zone needs reworking.	Noted	This strategy is along the same lines as the Policies H3 & H4 in the 2002 plan, which identified sites for future category A housing. This was dropped for the current plan as it still leads to hope value being placed on sites and thus speculation from land owners and potential developers which results in increasing land values even before they have been re-zoned. The draft Plan has identified sufficient land for housing and provides greater certainty so by reducing the potential impact of speculation on land for future zoning.	The Minister is not minded to amend the draft Plan
DP656		Mr Mark Le Boutillier	GR Langlois		Meeting Housing Needs	Objecting	The removal of the majority of the H3 & H4 sites from the plan:- The majority of these sites were selected for their suitability for housing from an original list of some 280 sites proposed. They were selected because of their locations and suitability for development. There is still a demand for family homes and these sites having already gone through a thorough selection process by Planning must still be considered appropriate for development? We believe serious consideration should be given to include more of the H3 & H4 sites to be retained on the new Island Plan for rezoning.		The comments of GR Langlois are noted.	The States Strategic Plan charges the Minister to identify, in the Island Plan sufficient development opportunities without further rezoning of green areas. The draft Plan, for the most part achieves this. Additional zoning of land for affordable housing may only become necessary should any of the proposed H1 sites be withdrawn or fail to obtain States approval. As drafted there is no need to designate additional land for Category A homes.	Noted by the Minister
DP957		Deputy Philip	Parish of St John		Meeting Housing	Supporting	Housing (Consultation Reference Category A Housing Sites, 6.4 6 and Affordable Housing in Rural Centres is		Noted	Noted	Support is noted by the Minister

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		Rondel	Working Party		Needs		supported under section 6.64 and also 6.122 of the DJIP 2009) The question of any further building, whether residential or commercial within the 'Villages ' is an important issue. To meet the possible needs of the Parish and its parishioners over the next 10 to 25 years it is necessary to identify both the need from within the Parish and areas where residential development of Affordable Housing could take place without acting to the detriment of the 'Villages' and as and when required over the time period by Parish-led development. The need to build will be assessed on the basis of demand within the Parish. It is acknowledged that field 605 is already approved for category A housing (over , 55s). The DJIP 2009 refers to 100 homes being needed in the Northern Parishes in the next 10 years. Affordable Housing in Rural Centres is supported under section 6.64 and also 6.122 of the DJIP 2009. The Working Party have identified that plans have been approved for 19 new homes and that currently there are further plans pending for another 43 homes within the Parish - the total yield could be 62 should they all receive planning approval. See Appendix 4.				
DP253		Peter Searle			Category A Housing	Supporting	Housing Needs I fully support the development of the 7 sites identified I also support the current approach of restricting development in St. Martin The way I see the housing need for St. Martin over the next 10 years. 1) 100 New house across the 6 Northern Parishes St Ouen, St Mary, St John, St Lawrence, Trinity & St Martin. 2)St Martin allocation 17 Houses 3) Correctly 8 Houses plus are to be built on field 402 4) Leaving a requirement for 9 new houses to be built over the next 10 years 5) 1 house per year required	I Would like to see the Plemont site returned to nature and the land to be bought by the States. I would like to see as much agricultural land as possible stay in food production, as our children will need this in the future.	Support Noted	1. The States have rejected the proposal to purchase the Plemont site 2. There are policies in place to protect agricultural land	Support is noted by the Minister
DP537		Deputy John Le Fondre			Category A Housing Sites	Neither	Environment - within the Plan there are some proposals over the percentage of social rented housing / homebuy etc that should be included in any mix of a development. Reference is made to this being done by reference to the viability of the scheme and there is also reference to the payment of a commuted sum. I refer to this later, however in essence this is creating some form of tax, over and above planning gain. In my view this needs to be carefully considered, however it would seem to me that if designed correctly, such a tax could also include environmental incentives / disincentives towards designing 'greener' buildings. This has to be very carefully considered, given that if a project is not viable, it will normally not be built.		Noted. The impact of the policy on viability is understood. The recommendation for encouraging greener homes is not relevant to this particular		Noted by the Minister

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									policy		
DP580		Deputy John Le Fondre			Category A Housing Sites	Neither	Inconsistency - Cooke's Rose Farm - St Lawrence - Para 6.79 refers to a theoretical maximum density of 15 dwellings per acre. However Appendix B2 refers to 19 dwellings per acre for this site. Is this a typing error ?		Noted		Minister to amend error in Plan
DP1101		Mr Roy Smith		Policy H 1	Category A Housing Sites	Objecting	Because of these recent and current planning proceedings in relation to this site, I hope you will understand that at present I have no alternative but to strongly object to the proposed rezoning of the site for Category A housing . It goes without saying, that, in the event that we are unsuccessful with our revised application and/or the associated appeals to the Royal Court, we would then support the alternative development of the site for Category A housing. I sincerely hope that all concerned in the decision making process on this matter will understand my position having read this representation.	I wish to make this representation and explaining my position on this matter, it is important to set out the recent and current planning situation regarding this site. Closure of business I have worked on and managed Beauvoir Nurseries (also know as De La Mare Nurseries) for some 37 years and have owned the site for the last 24 year s. Due to changing economic circumstances it was with deep regret that I was forced to close the business down on a phased basis during the period July to December 2008. I was the last person in Jersey to solely grow flowers for a living on a commercial basis for the local trade. Partnership agreement with developer During the period of the running down of the business, I entered into a partnership agreement with a developer OK Ltd) to pursue a residential development on the site. It was and is our understanding that the principle of redeveloping the site for housing (and not Category A housing) complies with the existing Jersey Island Plan 2002. Existing Island Plan In referring to the existing Island Plan Policies. I quote below point's previously made by my architect and advocate. These are as follows: On the existing Island Plan the south east corner of the site lies within the e 'Built up Area ' boundary, but most of the site lies in the 'Countryside Zone' where, under Policy C6, there is a general presumption against new housing development being allowed. However, Island Plan Policy C20 deals specifically with redundant glasshouse sites in the countryside. In summary, Policy C20 presumes against redevelopment of redundant glasshouses for non-agricultural purposes throughout the countryside generally, but allows for such redevelopment, as an exception to the general presumption against development in the countryside, where such sites are located alongside defined urban settlements (as at De La Mare Nurseries) and subject also to the proposed development complying with other listed planning criteria under Policy C20. This policy fits in with other Island Plan policies aimed at countryside protection (Policy C6) and the broader Island Plan spatial strategy and sustainability policies (under Policy G1) which are aimed at directing	Mr Smith's comments are noted. The planning application process, and any subsequent appeal if refused, will determine whether development is acceptable under the 2002 Island Plan. The Draft Plan proposes part of the site for Category A development, and as Mr Smith states, it is a fallback position for him in the event that the application fails	The Minister may consider enlarging the site to increase the capacity for affordable housing in the early years of the Plan, in the light of his intention to recommend removal of Samares Nurseries, Cooke's Nurseries and Longueville Nurseries from Policy H1	The Minister is minded to increase the size of the site and carry out further consultation.

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								<p>development to defined built up areas with existing infrastructure and amenities. Under these existing policies and subject to showing compliance with the detailed requirements listed under Policy C20 we felt that we could reason able expect that permission would be granted for a housing development on the site. My architect and advocate have also previously pointed out that, under the existing Island Plan: (1) the site is not zoned for Category A housing (2) the site is not zoned as a 'safeguarded site' for future Category A housing, which is the case with two other glasshouse sites on the Island; Carrefour Selous and Gorey (3) there is no requirement under Policy C20 that redundant glasshouse sites alongside defined settlement areas should be redeveloped for Category A housing Recent and current planning circumstances (1) Refusal of permission On 12th November 2008, an application was submitted by JK Limited to redevelop the site to provide for 31 houses and 15 apartments. This application was refused on 12 November 09 for two reasons which are summarized as follows: (i) that the Minister does not accept that all the glasshouse complex is redundant or dilapidated and, because the proposed development also includes an area of polytunnels, the proposal is contrary to Island Plan Policy C20 (ii) that insufficient information has been submitted to demonstrate that the proposed development will not have an adverse impact on the ecological 551 to the north of the site We were and are most aggrieved that, after 12 months following the submission of the application, and without any reasonable explanation for the delay in dealing with the application, permission was refused for these particular reasons given that; (1) on the question of redundancy, I had been required by the Agriculture Department to advertise the more modern area of glass in the JEP for a 3 month period to demonstrate redundancy not only to myself but to the agriculture industry generally. This I did and no replies were received. The Agriculture Department confirmed the redundancy of the nursery on 1st May 2009 Also the new Draft Island Plan, which was published 10 months after submission of the application and 2 months before determination of the application, and which proposes the site for 'Category A' housing, itself refers to the glass houses as being redundant! (2) part of the refusal concern s the inclusion of the polytunnels area within the scheme and yet, given</p>			

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								<p>that this is such a basic simple issue to address, why did it take 12 months to refuse permission on the this basis. If we had been advised of this concern shortly after submission of the application, we would have considered amending the plans. I would also point out that the inclusion of the polytunnels area went hand in hand with the removal of a glass house on another more sensitive part of the site together r with other environmental improvement measures. (3) the other reason for refusal concerns insufficient information relative to any impact on the adjacent 551, and yet the Department's Planning Officers, in recommending refusal on this basis, had not advised my architect of this concern nor requested any further information to give us the opportunity to address the matter. (2) Royal Court Appeal On 15th December 2009, an amended Notice of Appeal to the Royal Court was made against the decision to refuse permission. An agreement has recently been reached to put a temporary 'hold' on the appeal proceedings pending a decision on a revised planning application which is referred to in following point (3) (3) Revised Planning Application On 18th January 2010, a revised 'outline' planning application was submitted to redevelop the site for housing. This application involves a reduced site area compared to the previous application, excluding the poly tunnels area on the north east part of the site. This application has not yet been determined but hopefully permission will be granted. If refused, it is intended that a further appeal to the Royal Court will be made, to be considered alongside the appeal against the first refusal. (4) Request for Complaints Board Hearing On 4th February 2010, my advocate submitted a request for a hearing by the States of Jersey Complaints Board, to review the unacceptable delay in the processing of the November 2008 planning application, an d in particular to investigate whether the application was deliberately delayed by the Planning Department and Minister pending the further progression of the Island Plan Review. (5) Offer of compromise proposal Just prior to the Planning Panel's consideration of the November 2008 application, my architect wrote to the Planning Department to explain that, despite our opinion that the redevelopment of the site for housing (and not 'Category A' housing) complies with the existing Island Plan policies, we would be willing to engage in discussions with the Department and Minister</p>			

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								regarding a possible compromise proposal. This would be on the basis that, if the November 2008 scheme was supported, we would be prepared to offer a percentage of the units to first-time buyers. This offer was not taken up. For more detailed information on the above, the following are attached. 1. Layout plan and perspective drawing submitted with November 08 applications 2. Planning and Design statements submitted with the November 08 application 3. Notice of refusal dated 13th November 09 4. Notice of amended Notice of Appeal to the Royal Court dated 15th December 09 5. Letter dated 4th February 10 from Advocate N.M. Santos-Costa requesting a Complaints Board hearing 6. Site plan for revised outline planning application January 10			
DP157		Mr Stephen de Gruchy		Policy H 1	Category A Housing Sites	Supporting			Noted		Noted by the Minister
DP24		Mr Charles Prouten		Policy H 1	Category A Housing Sites	Neither	I am writing in response to the proposed rezoning of field 785 in St Ouen for category A housing. Although we have no objection to the plan we feel we must try to protect our property La fontaine Farm which is directly adjoining to the east of Field 785.	Firstly, field 785 is 4 - 5 feet higher than our property, if 2 storey houses are built close to the boundary they will overlook our home and will be able to see directly into our kitchen window. The window is 8 feet wide and the kitchen is a room in which we spend much of our time. This will greatly infringe on our privacy and enjoyment of the property. I feel that a permanent physical barrier will be needed to prevent this, such as an earth mound, concrete walls or substantial fencing. You may say that trees and shrubs will be planted along the boundary but as with our experience of Clos de Vautier which was built next to our field 783 at the rear of our property this is not sufficient. Some trees died, many were trampled by children and some even cut down by the tenants/owners. They also do very little to stop noise pollution and trespassing all of which has affected the enjoyment of our space at the rear of our property where we used to spend a lot of our leisure time. I therefore ask that if houses have to be built in field 785 that they are not built too close to the boundary, not too high and that some sort of physical barrier is put between them and our property. Secondly, we have a large granite barn which faces west towards field 785 which we hope to develop in the near future. Will this barn be deemed as overlooking the proposed housing? Stopping us developing it even though the building was there long before the proposed properties which are likely to overlook us! Some sort of guarantee that this will not happen would be an	The comments are noted, but are essentially related to detailed planning and are not sufficient to delete the site from Policy H1		Noted by the Minister

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								advantage. I hope you will take notice of these points and although I realize building has to go on, surely it cannot at great cost to other properties which were there many years before and which we have put a lot of financial commitment into.			
DP242		Mr Peter John Le Suer		Policy H 1	Category A Housing Sites	Supporting	None - The new areas chosen for housing in St. Clements, St. Ouens, St. Saviour, St. Lawrence, St. Peter and Grouville appear ideal for re-developing for housing and in many cases old glasshouses no longer in use or old industrial areas now no longer required as such, will be used for housing, rather than using agricultural land.		Noted		Support is noted by the Minister
DP255		A Brown		Policy H 1	Category A Housing Sites	Objecting	No future large scale development in St. Clement. Future developments to be considered in Parishes such as St. Martin, St. John, St. Mary, St. Lawrence, Trinity and St. Ouen. The Constable of St. Martin has stated that more affordable housing is needed in his Parish. Such developments will lead to better transport links throughout the Island.	Better transport links throughout the Island. Parishes being able to retain young people ensuring a vibrant and strong parish lifestyle for the future. Relieve current over crowding in other Parishes. Provide potential new business opportunities in these Parishes.	Noted		Minister likely to recommend deletion of Samares Nursery from the Draft Plan given opposition of the Constable and a petition.
DP359		Mr Vincent Obbard		Policy H 1	Category A Housing Sites	Objecting	St Clement has provided more than its fair share of St Helier's housing overspill.	We have a specific concern relating to the proposed development of Samares Nurseries for housing. The main freshwater drain from the nurseries flows into the canal running through Samares Manor Gardens, a proposed site of Special Interest. If homes are built at the Nurseries, the existing drainage will be insufficient, causing flooding to the gardens, nearby housing, the Golf Course and Georgetown Park Estate.	Comments noted		Minister likely to recommend deletion of Samares Nursery from the Draft Plan given opposition of the Constable and a petition.
DP38		Mr Anthony Paintin	La Societe Jersiaise, Ornithology Section	Policy H 1	Category A Housing Sites	Objecting	Removal of the De La Mare Nurseries site, from the list of proposed cat A housing sites.	On Behalf of the Ornithology Section of La Societe Jersiaise, I wish to object to the re-zoning of the De La Mare Nurseries site, Grouville, for cat A housing. The development encroaches too closely upon the designated SSI Grouville Marsh, one of the most important marshland habitats in the Island. Over the past years there have been a number of developments adjacent to the marsh namely, Les Maltiers, La Motte Garage Site and there is also a proposed cycle track route along the southern boundary. Any development adjacent to Grouville Marsh will only increase disturbance and we consider the main threats to be:- Predation of birds and mammals by domestic cats. Danger to children entering the marsh, there are areas of deep water, immediately behind the nursery site. Possibility of water pollution. Fly tipping, this already occurs in other adjacent areas of the marsh. Noise and light pollution. Tony Paintin, Bird Recorder, Ornithology Section, La Societe Jersiaise.	The points are noted.	There should be a buffer strip between the proposed development and the marsh.	Noted by the Minister
DP385		Mr Paul Martin		Policy H 1	Category A Housing	Supporting	No changes are required. The stated objective of the Island Plan to ensure there is a sufficient supply of	It is vital that islanders and politicians are encouraged to view the Island Plan as a whole and	Comments noted		Minister likely to recommend

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					Sites		housing stock to meet projected demand.	to recognise that there is an overriding need to ensure that affordable housing is available for the local population. Similarly, it is abundantly clear that Jersey must aim to protect its areas of natural beauty, in particular its coastline and remaining countryside. Finding a compromise between these two competing objectives was never going to be easy. Those who reject any development are perhaps oblivious to (or in ignorance of) the difficulties faced by sections of the population who are unable to find affordable accommodation. This problem is particularly acute for young working families. On the other hand, although it might deliver the affordable housing that is acutely required, it is also clear that building on greenfield sites is also particularly undesirable. The only sensible approach to meeting competing demands seems to be that taken by the authors of the plan - focussing on developing brownfield sites and the regeneration of St Helier in preference to rezoning greenfield sites (which should only be considered when all other options have been exhausted). It has proved fortuitous that certain parishes have been 'spared' the urban-creep of development suffered by St Helier and its surrounding areas. Suggesting that some parishes have 'suffered too much' and that development should take place in 'rural' parishes misses the point entirely. History cannot be undone. Parishes close to St Helier have become relatively urbanised but this was, and is, inevitable given their location. Emphasis should be placed on brownfield sites within built-up areas, wherever they happen to be situated. This will ensure that Jersey's true countryside is safeguarded for the future. Having reviewed each of the Category A Housing sites, it appears that each has been carefully chosen. What concerns me is that the work of the authors in describing the appropriateness of each of the sites is very likely to be ignored by many objectors who are unable or unwilling to recognise that new development is necessary to meet the objectives of the plan or who will blindly stick to a NIMBY' point of view to the detriment of the community as a whole. In particular, the Samares Nursery site has received a number of critical responses and yet, based on the specifications in Appendix B to the Island Plan, this site appears particularly suitable: The site is already within a build-up area and is not a green field site. Due to existing concreted areas it is expressly recognised that in the Island Plan "reinstating the land to agricultural			deletion of Samares Nursery from the Draft Plan given opposition of the Constable and a petition

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								use is well nigh impossible". Samares Nursery is located within a popular area: it is close to St Helier, has good transport links and has several schools close by along with numerous facilities (sports, youth club, shops, beaches). From the perspective of those living nearby, the site is not visible from the main road and will have limited visual impact on the surrounding environment and would actually improve what is there already (redundant glasshouses and concrete). Most importantly of all, the Samares Nursery site is stated as being equivalent in size to all of the other Category A Housing Sites put together. Developing this particular site would therefore appear critical to deliver the required number of new houses - the other sites "chip in" but without development at Samares Nursery other sites will be required elsewhere.			
DP623		Deputy Ian Gorst		Policy H 1	Category A Housing Sites	Objecting	I want to put on record my complete support for the Connetables representations to remove the Samare Nursery site form the proposed re-zoning.	I have no doubt that the inclusion is not required, that the plan will deliver appropriate supply, and that its inclusion would result in the continued over development of St Clement. Which is totally unacceptable.	Noted		Minister likely to recommend deletion of Samares Nursery from the Draft Plan given opposition of the Constable and a petition
DP624		Conneta ble Deidre Mezbour ian		Policy H 1	Category A Housing Sites	Objecting	As Connétable of St Lawrence and with the support of the St Lawrence Parish Roads Committee, I submit the following comments for consideration. Planning policies and initiatives must not be permitted to disregard issues that affect specific areas within our Island. Where it is quite clear that it would be inappropriate to apply an Island wide policy, there can be no argument for enforcement. A case in point is the proposal to re-zone the Cookes Rose Farm site in St Lawrence for Category "A" housing (current planning zone is "Site safeguarded for Category "A" Homes"). I have been contacted by a number of Parishioners who consider the proposal to be inappropriate and ill advised; they support my view (and that of the Roads Committee) that it is a poor site for re-zoning for the purposes of Category "A" housing. Lack of Suitability The site has limited pedestrian access; the principle physical constraint is the narrow access road, already serving approximately forty dwellings; the area has limited capacity to accept new development. TTS has consistently opposed re-zoning because of the distance from facilities and amenities, as well as the limited bus service to the area. The local food store is within walking distance, however there are no		The Constable's comments are noted		Minister likely to recommend deletion of Cooke's Nursery from the Draft Plan given opposition of the Constable.

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							<p>pavements in the area for pedestrian safety. Should a topographical survey confirm that a pumping station was required for foul drainage (for more than six buildings), this could result in a cost to the public purse if TTS assumed responsibility for ongoing maintenance. Surface water costs could be considerable, there are no Public surface water sewers and the nearest watercourse is some distance away. It is unlikely that the Parish would support off-site sewers along Parish roads. Public Transport Routes 5 and 7 currently serve this site, however theses services are not "commuter friendly". It is highly unlikely that a frequent bus service will be provided that would be economically viable to the States of Jersey. Traffic Impact There is few alternatives for commuters; therefore the number of vehicles generated from the site would be high. With few employment opportunities in the area, most commuter journeys to the Island employment zone in St Helier would utilise the already busy Mont Felard road and the junction with La Route de St Aubin. The site has very poor links into the immediate road network. This road network is sub standard and in the middle of an existing piece meal development. The only access to the site is from La Grande Route de St Laurent, by way of turning into Le Passage, a narrow Parish owned road. The road is one way only from that direction, specifically because it is too narrow to be two way. Other nearby Parish roads have been made one way in an effort to mitigate road safety. The Parish is responsible not only for the upkeep and the maintenance of Le Passage, but also has responsibility for policing the one way systems. The Honorary Police and I already receive (regular) calls from nearby residents regarding drivers turning into Le Passage from the "No Entry" end adjoining La Rue Sara Henri, as well as by turning right from Le Clos de Devant and La Clos Sara. The roads nearby, through both Le Clos de Devant and La Clos Sara, leading directly into Le Passage, are private roads, owned and maintained by the residents. I reiterate that both roads are privately owned and should not be taken into account as access into Le Passage. Nearby residents are concerned that these private estates will be used as a short cut to any new development. This is already the case, in spite of the "Access to Premises Only" signs erected by the residents to prevent non residential vehicular access into Le Passage. There are already challenges in accessing the site, consideration must be given as to how these would be overcome for construction vehicles. I believe that there are obvious road safety</p>				

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							implications if this development is approved, particularly for: Pedestrians, Cyclists and Horse Riders The area is well used by pedestrians, by cyclists and by horse riders; Le Passage itself joins on to La Rue de Douet du Rue, which is a green lane; I understand that Le Passage and the surrounding lanes form part of Route 4 of the cycle routes set out by Jersey Tourism. Only the keenest cyclist would be likely to attempt the challenging commute into the main employment area within the town. There are few community facilities within reasonable walking distance. With few roadside footpaths, walking to the nearest shop or to the St Lawrence Primary School cannot be encouraged. The narrowness of existing roads does not allow for the construction of further pavements; had this been an option, the Roads Committee and I would have considered them as part of our commitment to improving pedestrian safety within the Parish. Traffic (both pedestrian and vehicular) has already increased considerably in the area following the development a few years ago of an estate of eleven properties in Rue de Douet du Rue. Schools The St Lawrence Primary School is more than a mile away (1600m) already most parents do not permit their children to walk or cycle there. Traffic congestion at the school is considerable during morning drop off and afternoon collection times, with La Rue de L'Eglise inaccessible at those times. The second Primary School in the Parish, Bel Royal, is 3,200m away, the only pavement on the route begins at the bottom of Le Mont Cambrai. Apart from these, the closest Primary Schools are St John (2,000m) and St Mary (2,200m). The distances to the State Secondary Schools are: Haute Vallee (4,000m) Grainville (5,500m) Les Quennevais (6,000m) Haute Vallee is the catchment area school for St Lawrence Primary School, the nearest school to the proposed re-zoning site. This Draft Island Plan places an emphasis upon a reduction on our car dependence and proposes that new developments should be located to reduce the need to travel, particularly by car. Notwithstanding this Draft Island Plan, the current Plan (2002) has similar policies. Policy H8: Housing Development Within the Built Up Area The site is in the designated built up area and while there is no "right" to develop, this policy states that development will normally be permitted provided the scheme accords with the criteria in the policy. One of those criteria is Article (v) which states that development will not lead to unacceptable problems of traffic generation, safety or parking. I believe that there will indeed be unacceptable problems of traffic				

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							generation and am concerned that pedestrian safety will also be compromised. I believe that the following sections of the current Island Plan must also be considered before deciding whether to re-zone: Strategic Policy Review Environmental Objectives (2.9) To reduce the detrimental impact of traffic upon peoples lives To limit the impact of noise and other nuisances Quality of Life Objectives (2.9) To limit the detrimental impact of traffic on the lives of Island residents To limit the impact of noise and other nuisances Built Environment (2.12) To integrate into the sustainable transport policy measures to address traffic related problems in the built environment Key Rural Settlements (3.24) Some are very restricted in capacity due to their local environment... and physical restraints such as access Accessibility (3.34) and (3.35) Reducing the need for motorised travel Ensuring that those who do not always have access to a car can gain access to facilities and services and are therefore able to participate in society Accessibility (3.34) and (3.35) The first priority of the strategy is for housing development to be located within walking distance of jobs, facilities and services The second priority is for development to be within walking distance of a bus route Other locations would need additional facilities such as a primary school within walking distance Environmental Impact (3.36) The environmental impact of development can be assessed in terms of habitats and biodiversity Avoiding Constraints and Ensuring Practicality (3.37) Site access and existing traffic problems Capacity of schools Transport Strategy (3.53) and (3.54) and (3.56) and (3.60) Reduce the detrimental impact of traffic upon peoples' lives Limit the impact of noise and other nuisances Develop transport and planning policies which encourage the use of public transport and minimise the use of other vehicles The policies will encourage cycling and walking Improve facilities for pedestrians with safe routes along roads Improve safety and security for transport users, giving priority to pedestrians and cyclists I have noted with interest that the Transport and Technical Services Department have consistently opposed this site for re-zoning . Amongst a number of comments submitted, they have asserted that it does not accord with the States of Jersey Strategic Plan 2009-2014, which clearly aims to "persuade people out of their cars" . Fundamental to achieving this States agreed policy is the location of new housing, which must of necessity give the option to persuade people out of their cars. As the local Highway Authority, I formally request that a Transport Statement be produced to				

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							assess the potential impact upon all nearby Parish roads at peak times, before the Draft Island Plan is approved. Transport and Technical Services Traffic Engineers made the following Highways Comment during the recent application process for another development in Le Passage: "It is noted that there may be an increase in frequency of use at peak times. Visibility at the La Rue Sara Henri/La Grande Route de St Laurent is below standard, and visibility at the Le Passage/La Rue junction is practically nil. The Department cannot support any increase in use of the Le Passage/La Rue junction". The St Lawrence Roads Committee and I endorse these comments. I trust that this submission has been of help and that it makes clear the strength of Parish opposition based upon sound policy objections.				
DP657		Mr Mark Le Boutillier	GR Langlois	Policy H 1	Category A Housing Sites	Objecting	Policy H1. The increase of the percentage of affordable homes from 45% to 75% on sites rezoned for Cat A housing:- We do not believe many landowners will be persuaded to sell their land at a price that will make developments viable with this revised percentage split.		GR Langlois's comments are noted but not accepted	The evidence base in the plan for housing needs is based upon the best available at this time so and amendments to this policy will only be made should new evidence emerge. If there were to be discussions on notional evidence then it could be argued that, given the recent economic downturn, the need for the Jersey home buy category of housing is actually higher than the stated 75%.	The Minister is minded not to amend the plan.
DP681		G V Gaudin		Policy H 1	Category A Housing Sites	Objecting	The Samares Nursery site should not be developed for housing but returned to agricultural use	Full support and consideration should be given to the submission of the National Trust for Jersey	Noted		The Minister is minded to amend the draft Plan to withdraw the Samares Nursery housing site
DP692		Mr Andrew Fleet	Style Group Ltd	Policy H 1	Category A Housing Sites	Objecting	Windfall developments - the estimation of 1700 dwellings coming forward on 'windfall sites' is far too optimistic. The basis of the assessment that from 1990 to mid 2006 such developments accounted for an average of 165 homes/annum is not relevant to the period of the draft Island Plan. This period did not have policy E1 or H3 preserving employment sites or introducing affordable housing. For the reasons raised else where in this paper, windfall sites producing 1700 dwellings is unrealistic. This figure will fall dramatically due to the impact of Policy E1 and H3, therefore creating the requirement to identify additional housing sites. These additional housing sites should be identified now on redundant glass house sites on the Island to replace the deficit on windfall sites. Delivery of new housing - it is admitted in the Draft Island Plan under item 6.85 that zoned		The comments are noted.	The Minister is likely to reduce the proportion to 20% and the threshold site size to 10 homes and above. He may also defer policy H3 for 12 months to allow sites on which values have already been agreed to clear the planning application system. This will make the requirement less onerous, and most developments will not need to meet the obligation. Accordingly, it is anticipated that we will be able to meet the anticipated requirement of 600-650 affordable homes through policy H3. Should any of the H1 sites be	If H1 sites are conceded or not approved, new sites will need to be found to displace them

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							sites may not be brought forward for development. In this event it is supported that there may be a need to effect their acquisition by the States to realize the provision of homes to help meet demand. Why are the States suggesting using tax payer's money to acquire sites for Category A housing when the private sector is prepared to offer derelict glass house sites for development at no cost to the tax payer? Alternative sites are available now and should be identified now as part of Policy H1			withdrawn, or not agreed by the States, it may be necessary to replace them with new sites.	
DP713		Mrs J Egre		Policy H 1	Category A Housing Sites	Objecting	Field 739 St Peter I am writing to you as the owner of the above field in light of the recent publication of the draft Island Plan. I note with some distress that one of the sites proposed for re-zoning is Samares Nurseries in St Clement. I live in St Clement and can confirm that it is without doubt completely unacceptable for St Clement to suffer any further large scale development such as the one proposed. However I do recognise that new homes are still required and would therefore ask that the above field be considered for re-zoning. I enclose a copy of the location plan which shows the site to be adjacent existing development. This field is without doubt far more suitable for development than the suggested St Clement site; it is close to the village and all the amenities which that afford. I would be prepared to consider a partnership with the Parish for either first time buyer or sheltered housing. Whilst this is currently within the countryside zone it is across the road from a recently approved development which was also within the countryside zone. The site could be developed almost as soon as any permission was granted. I ask that this request for consideration be presented to the independent inspector so that it can be considered alongside other sites during the examination in public. Thank you for reading this letter, I look forward to receiving your confirmation that my field will be considered as requested.		The comments are noted.	It is likely that the Minister will recommend removing Samares Nurseries from H1 given the opposition from the Constable and the petition to this effect that the Constable has lodged in the States. Field 738 St Peter is too remote from the village centre to fit with the Plan's Spatial Strategy	Not suitable for H1 site
DP777		Michael Paddock		Policy H 1	Category A Housing Sites	Objecting	I do not think this development should take place.	My mother who is 78 owns a property just down the road heading towards Route de Trodez her property floods now from the surface water a lot which comes from that site. TTS have tried to solve the problem but failed. I do not believe it is right that most of the traffic leading to this area should come down Route de Trodez and Route de Millais the noise, speed and volume on these roads has affected the resident's quality of life living in this area. If this development was to go ahead the parking arrangements on site would need to be well thought out lessons have to be learned from the Ville Vantrier site I suggest you talk to St Ouen Honorary Police about the subject. The location of	The comments are noted	Equally it is recognised that there is a sufficient supply of office accommodation and that outworn or poor quality sites could be a positive source for urban housing regeneration.	Noted by the Minister

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								this site is remote people will use cars, public transport does not carry many people I see the bus every day this development will put more pressure on traffic on the west of the Island. That is just a few comments I could go on with a lot more.			
DP784		Senator Terry Le Main	States of Jersey Housing Department	Policy H 1	Category A Housing Sites	Objecting	Policy H1 fails to make any provision for social rented homes. That would in my submission be a very grave mistake. The words 'Jersey Homebuy' should be replaced with 'Social rented or Jersey Homebuy in proportions to be defined by the Minister with reference to the prevailing need identified by reference to the Affordable Housing Gateway'. I would advocate keeping the site make up proportions as flexible as possible in order that we can take maximum advantage of market conditions and prevailing need as and when sites come forward. Undoubtedly the flexibility offered by the 2002 Island Plan and the subsequent amendment to Policy H1, which the States approved, allowed you to use the La Providence site to deliver upon your election manifesto to introduce Shared Equity (Jersey Homebuy). In her report on social housing provision in Jersey, Professor Christine Whitehead OBE raises significant concern about the potential unmet need for social housing in Jersey which we are only just managing to control by virtue of our extremely constrained and probably unsustainable allocations criteria. The point is that if we are too specific about the site use at the time of zoning we may end up with a development coming forward down the line with homes which do not properly address the needs of those needing homes at that time and little flexibility to adapt. Much better to keep it flexible and for you to decide on the appropriate proportion of the homes which will be used for the various Category A purposes at the time that firm development proposals are agreed. Such proportions must be based on the evidence that we will be able to produce from the Affordable Housing Gateway.		The comments of the Housing Minister are noted	Consideration will be given to this suggested change of wording to allow the Minister to apply the requirements in a more flexible manner - 'Social rented or Jersey Homebuy in proportions to be defined by the Minister with reference to the prevailing need identified by reference to the Affordable Housing Gateway'	The Minister notes the comments of the Housing Minister.
DP844		Mrs Susan Kerley		Policy H 1	Category A Housing Sites	Objecting	Field 114, Cookes Rose Farm, Le Passage, St. Lawrence. Appendix B2	Field 114, Cookes Rose Farm, Le Passage, St. Lawrence. Appendix B2 I wish to object to the rezoning of this land for the development of up to 30 units of accommodation. The reasons for my objection are that it is not commensurate with several of the major policies in the Draft island Plan. SUSTAINABILITY To develop this land would not be commensurate with a sustainable pattern of development for the Island and is in an inappropriate location. The farm is at least a mile from St. Lawrence Village, has very limited public transport and very few amenities. There is only one small paper shop within walking distance.	Objection noted	The Plan highlighted a need for 1000 category A homes, the majority of which are planned to be developed within the existing built up areas. A small number of sites (7) were identified to provide around 200 family style Category A homes that could not easily be provided within the built up areas. These 7 sites were selected because they met with strict planning selection criteria including; that they fitted well	Minister minded to support request to remove site from Plan.

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								<p>Because of the adjacent agricultural use the Health Protection Services have said that this site could pose a risk of developing into a statutory nuisance issue. POLICY SP6 REDUCING DEPENDENCY ON THE CAR. The roads in the whole of this area are narrow and almost all have no pavements. The nearest Primary School is in the village and because of the lack of pavements most parents deliver their children by car. This development would not therefore comply with Policy SP6 Reducing dependency on the car. Anybody who lives in this area will need at least one car to take children to school, to shop, to visit the Parish Hall, to go to Church and to go to work. The development is for up to 30 units of accommodation. If these are added to the present application for 17 luxury houses the number of vehicles in this area could be increased by 50 to 60 cars. Le Passage is a one way road at present because it is so narrow and it is surrounded by private estates. In addition the St. Lawrence Main Road narrows at the entrance to Le Passage. This is already a bottleneck. Passing is particularly difficult with heavy duty vehicles travelling to Ronez Quarry and the Thistlegrove industrial site (which there are plans to enlarge). There is also the weekly Maillards auction. TTS has recognised the seriousness of this problem and consistently not supported this application. ERE6/7 To develop land here does not comply with ERE 6/7 para 5.156 which states that redundant greenhouses are regarded as temporary structures and should be removed.</p>		<p>within the existing built up area and met with the revised spatial strategy policies for the island, did not cause any significant visual or environmental harm, were near good transport network/bus routes/schools/shops and, where possible, were brownfield sites. This site met with all of these criteria and was also highlighted in the 2002 Island Plan as a future category A housing site. The removal of this site will reduce the supply of category A family homes and alternative provision will need to be found in order to ensure adequate overall supply of these types of homes on the Island is met. However, this site is not supported by the Parish of St. Lawrence and the Minister for Planning & Environment has given an undertaking that any site not supported by the relevant Parish will be withdrawn from the draft Plan. Accordingly this site has been withdrawn and so the request to remove this site is therefore supported by the Minister.</p>	
DP887		Mr Robin Barthorp		Policy H 1	Category A Housing Sites	Objecting	<p>I was at the Parish Assembly last night which was, amongst other things, to discuss the rezoning of Field 622 off Rue de la Croute. Whilst I am not currently a resident of St. Ouen, I do have an interest in the outcome as I accompanied my elderly and partially sighted father, Major Michael Bathorp, who lives, as you may know, in Rue de la Croute. Also I spent my childhood years living on Route de Plemont, so I consider myself at least a little "St. Ouenais". Whilst I listened with great interest to the argument and counter-argument, which was both passionate and forceful on both sides, I feel compelled to protest that the outcome of the vote to re-zone was not altogether valid or fair. If I may explain my reasoning.... As the Procueurs counted the vote from the front to the rear of the Hall, the majority of people lowered their hands once their vote had been counted. I was sitting with my father about 3 rows from the front on the side nearest the village green.</p>		<p>Support for zoning Field 622, St Ouen Green zone noted</p>	<p>Field 622 St Ouen is not proposed for Category A development in the draft Island Plan. We have no comment to make on the procedures in the Parish Assembly</p>	<p>The Minister notes the support for zoning Field 622, St Ouen Green zone</p>

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							As the votes were counted for the vote against the proposal, I turned round after they had passed us to watch the proceedings, Imagine my surprise when the officer counting the votes on my side of the hall, indicated, as he approached the penultimate row that he had lost count and that he was starting again from the back row forwards. Many people ,including my father, had already lowered their hands, as in the first round of voting and were not therefore included in the recount, because they were not aware of what had happened behind them. Surely if a re-count had been necessary it should have been more publicly announced and started again formally from the front of the Hall? Whilst I have absolutely no doubt about the integrity of the official concerned, I felt that he was at the very least rushing due to the lateness of the hour and the fact that people were restless to get home. I cannot say how many votes were missed during this flawed count but find it hard to accept the some what farcical way in which it was carried out. I would be very grateful to hear your views on this important point.				
DP902		Conneta ble Len Norman		Policy H 1	Category A Housing Sites	Objecting	Further to our recent conversations I write to formally request you to remove Samares Nursery from the list of Category A Housing Sites on the grounds that it is not necessary.	Further to our recent conversations I write to formally request you to remove Samares Nursery from the list of Category A Housing Sites on the grounds that it is not necessary, it overburdens a Parish which has already contributed more than its fair share of housing provision for the Jersey population, that by doing so you renege on your promise not to allow major development without the approval of the relevant Connétable and that a more suitable use could be found for the site. It is not necessary. This is a simple matter of mathematics. Between now and 2018 you are expecting an overall demand for homes of 4,000 in number compared to an estimated supply of 4,575. The Plan is therefore proposing an oversupply by some 14% % and this before taking into account the additional homes that would be provided in the scheme to support Parish vitality in the northern and central Parishes. Under Policy H1 on page 250 of the draft plan you look to the seven sites mentioned to yield some 200 homes in total of which, I imagine, some 100 would be on Samares Nursery. By removing this site from the list the total anticipated oversupply of homes would reduce 475, plus, of course the vitality scheme homes. Overburdening of St Clement It is often not realised that St Clement is Jersey's smallest Parish with a land area of only 4.2 km2, some 50% less than, for example, St Mary, the second smallest, which covers some 6.5 km2. On	The Constable's comments are noted. He will be presented a petition to the States, which will be debated on 6 July 2010		The Minister is likely to recommend that this site is removed from the draft Island Plan given the Constable's opposition and the petition.

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								<p>the other hand, St Clement is home to 9% of Jersey's people with a population of 8,196 giving a density of 1,951 persons per km2 compared with St Mary, which has a population of 1,591 and a density of 245 persons per km2 From the following table, taken from the 2001 Census, it can be seen that despite being the smallest Parish by some margin, the density level in St Clement is second only to St Helier. This I think proves my assertion that this Parish has done more than its fair share in housing the local population and it is no wonder that St Clement wishes to resist any further significant development. During my election campaign last autumn it was reaffirmed to me that most Parishioners are opposed to further large scale development in St Clement, and this applies to resident from all parts of the Parish including our more urban areas. The Minister's Promise I have been reassured by your regularly made promise in public that you would not allow large scale development on sites unless you had the support of the relevant Parish Connétable, You can be in no doubt that on this occasion my support will not be forthcoming. It might be that you would wish to go above my head and attempt to persuade the St Clerntentais to support the development. To dissuade you from this course I enclose a copy of the minutes of a Parish Assembly held on February 8, 2005 when a proposal was put forward to provide something like 25 units of Parish sheltered housing on the site on the understanding that the Assembly would support the provision of 125 additional houses on Samares Nursery. I was at that meeting, which filled the Parish Hall almost to overflowing, and indeed the discussion was lively and the resulting vote was almost unanimously against the proposal. There has been no change in mood, and indeed the sheltered housing/retirement home scheme will now be going ahead on a site which you brought forward for rezoning a year or so ago. We are not ducking our responsibilities. Other Uses It is inevitable that despite the size of the site it will be claimed that it will never again be used for horticultural or agricultural purposes. And while there is "hope value" for housing development this might well be the case. But this depends on the economic situation at any given time. With food prices around the world rising it might be that in the not too distant future we will be looking for areas such as this to sustain our own population, and increased food prices may well make Samares</p>			

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								Nursery viable gain. The site is in private ownership and whatever happens there I respect is for the owner to decide provided it is consistent with States policies. Being situated where it is, close to Le Marais high rise, many flats and apartments without gardens and recent developments with postage stamp gardens, the demand for allotments in this area is bound to grow. It is recognised that some investment will be needed to create allotments on this site - as it will be for any site near the urban area - but I suggest that this would be a much more appropriate and acceptable use that creating a 100 homes, which by your own figures, we do not need. Indeed your own policy of (or lack of it) on garden grabbing is going to increase the demand for allotments as more and more gardens have concrete poured over this important private amenity and growing space. If you think it would be helpful to convince you of the strength of feeling of St Clement I would be quite happy to organise a major demonstration near the site and provide a significant petition. Please let me know if you would like me to do this. Finally, I believe the sentiments expressed in this letter are shared by the two Parish Deputies.			
DP934		Mr James Godfrey	Royal Jersey Agricultural & Horticultural Society	Policy H 1	Category A Housing Sites	Objecting	Compulsory purchase: The concept of compulsory purchase should be resisted as there is too much scope for its abuse; indeed the States has a poor track record in this regard.		Reject	The use of compulsory purchase powers will only be used where absolutely necessary and their use is strictly governed by law.	The Minister is not minded to amend the draft Plan
DP785		Senator Terry Le Main	States of Jersey Housing Department		Previously Zoned Category A Housing Sites	Neither	Paragraph 6.89 The delays in the delivery of sites zoned for Category A housing must be a very real concern for the Public. When land has been zoned specifically to meet defined and more often than not very urgent need, it cannot be acceptable for developers and landowners to simply sit on sites until it suits them to develop. For that reason we must consider putting a development timescale on sites when they are zoned. If work on site has not commenced substantively by the deadline then the site switches to Public ownership by way of compulsory purchase. This process and the timescales should be approved by the States as part of the zoning process. This would ensure timely development and might dovetail into comments that I will make later in this letter in respect of how commuted payments from developers can be utilised by the Public in the absence of land on which to develop.		The Housing Minister's comments are noted.	Policy H1 already provides for the use of compulsory purchase powers to ensure that sites are developed in a timely manner	Noted by the Minister

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DP159		Mr Stephen de Gruchy		Policy H 2	Other Category A Housing Sites	Supporting			Noted		Noted by the Minister
DP771		Mr Graham Bisson		Policy H 2	Other Category A Housing Sites	Objecting	Trinity - Field number 1404 - La Grande Route de St Jean This small field of exactly 1 acre in size is flat, level, well drained and has an existing access via a short lane leading to the main road to the west known as La Grande Route de St Jean. It is also at the heart of the relatively new Sion Village . The field is secluded and bordered on all sides by private dwellings, a garden centre and commercial premises being a filling station and general retail store. All mains services are available in La Grande Route de St Jean. This field was chosen by the Planning and Environment Department to be included as an H4 site in the current Island Plan. (Number 19 of 21 sites) H4 sites were those "safeguarded for future category A Housing needs" and would subject to public consultation be considered for rezoning, "depending upon housing demand and land availability" Under paragraph 8.1 12 (which followed immediately after the H4 statement in the current Island Plan) it was stated that ; "The Planning and Environment and Housing Committees are aiming to ensure that all Island residents, including those in need of affordable or special need housing, have the opportunity of a home." Etc In the proposed Draft Island Plan H4 sites no longer exist. This site could be easily developed to produce 16 first time buyer homes in the heart of an existing small village settlement. As a member of the family that owns this site, I wish to inform you that we are willing sellers and have reached agreement with a medium sized local developer who is keen to proceed. I would therefore ask that serious consideration be given to the rezoning of this site in order that it may be included in the proposed Draft Island Plan when it is approved.		Reject	Site does not comply with spatial strategy and does not meet with planning Minister's criteria for protecting green fields and open spaces. This includes the extension of the built-up area boundary, into the countryside, to allow for smaller-scale incremental development opportunities. There are, therefore, considered to be no grounds for the release of additional greenfield land.	The Minister is not minded to amend the draft Plan
DP980		Mr. Maurice DUBRAS		Policy H 2	Other Category A Housing Sites	Supporting	Policy H2, of Field 873 potentially as a sheltered housing site is positive. The community badly needs such a development in this area. However, I trust that this is the last 'new' area of lower St. Lawrence to remain designated for Housing; we have already had our share, some would say 'more than', of public or Category A housing.		Noted		Support is noted by the Minister
DP117 4		Mrs. Celia Scott Warren			Affordable Housing	Neither	I support consideration being given to new ways of building homes more cheaply in Jersey, to bring them within the financial means of young people and other aspiring home owners. This may mean bringing in builders from France or other parts of Europe. We need to think 'outside the box' regarding how we can deliver homes more cheaply in Jersey.	I feel we should do further work to consider the knowledge gained on the visit to see housing in France. We need to address the issues regarding how these homes can be built more cheaply than we are able to do in Jersey.	Noted		Noted by the Minister

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DP581		Deputy John Le Fondre			Affordable Housing	Neither	Ref: Paras 6.96- 6.116 Viability - I note the intention of the Minister and the principle appears extremely laudable. However some of these proposals have (in my view) the characteristics of being a tax, particularly as they impose a cost (including the possibility of a commuted sum), which is determined by an ability to pay (ie the viability of a project. To me this whole section needs very careful consideration, in conjunction with Treasury and perhaps Property Holdings and some other stake holders. In my view this section should be heavily simplified, to refer to proposals to be brought separately to the States, and that a small working group be established to consider this. I have previously looked at a form of levy based on the cost of a build (ie therefore it is an objective measure), and to me these particular proposals have the potential to be cumbersome. It may be the case that a combination of planning gain and some form of charge might be the way forward, and the latter could also potentially influence behaviour in other areas (e.g. more environmentally friendly buildings etc).		Noted		Noted by the Minister
DP698		Mr Andrew Fleet	Style Group Ltd		Affordable Housing	Objecting	The impact of the recession on the housebuilding industry will now be the key determinant on the delivery of new housing. The principal issues will be; firstly, the potential for several years of low housing completion causing a gap in the trajectory which will be difficult to cover later in the plan period. Secondly, the relationship between the development of Windfall and Brownfield land will require a re-evaluation to ensure both regeneration and housing targets are each given appropriate priority. Thirdly, despite UK government intervention bank lending remains restricted and finance for either housebuilding or purchasing will be the overriding constraint on delivery. Many sources predict what is called a 'W recovery where instead of a straight line to recovery there may well be a second recession. The implications of a second period of downturn are that trajectories which depend on sustained levels of housing delivery late in the plan period to compensate for a gap in 2010 - 2015, may turn out to be unsustainable. This possibility needs to be taken into account in new housing projections, together with the uncertain impact the proposed affordable housing policy will have on the rate and volume of future housing development. Whilst there are positive signs of the economy beginning to recover consumer spending will take time to return to pre 2008 levels. All these factors point to a slow recovery from recession for the property market with no 'boom time' housing completion levels to replenish		The impact of the current recession on both the demand for and delivery of new homes is recognised. We are assuming a 'normal' projection of demand and supply over the plan period which recognises that while there may be	The Minister is likely to reduce the proportion to 20% and the threshold site size to 10 homes and above. He may also defer policy H3 for 12 months to allow sites on which values have already been agreed to clear the planning application system. This will remove the 'disincentive effect' from over 80% of all applications.	Noted by the Minister

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							housing forecasts within the foreseeable future. There is a saying that the worst possible things happen at the worst possible moment. This is certainly true for the impact caused by the reduced viability of housing projects. This began before the recession, but had been masked by the successful boom years. If true, the 'austerity circumstances ' in which we now find ourselves combined with reduced viability and reduced sales value will act as a considerable disincentive for investment in housing projects. Project viability is predicted to be the post recessionary period's most important issue, and will undoubtedly be made more difficult by the introduction of a 'tax' on development. Even before the current recession, many developers were concerned that their sites would become unviable unless there was some relaxation or deferment in new building regulations, percentage for art and eco-standards. With the proposed introduction of affordable housing the cost of meeting many of these requirements relies on ever increasing house prices and static land values this will now render many housing projects unviable. The fear is that the increased burden on landowners and housing providers will mean that they have little or no incentive to release land or build new homes on the scale necessary resulting in a reduction of new homes to the Island. Conclusion It may take a long time before the market is able to deliver anything near the quantity of housing we need. The reasons for the market failure go beyond the reach of housebuilders, planning authorities and land owners. Other factors have played their part, and under-supply of development land with planning permission has been a fundamental obstacle, as has, more recently, a chronic shortage of mortgage availability. However, the uncomfortable truth is that levels of supply are falling, while demand and need are rising. The introduction of affordable housing at this difficult time in the economy is likely to reduce the number of new homes constructed , increasing the demand, increasing the price and reducing the affordability for the first time buyer. Therefore the proposed policy of affordable housing will have the immediate effect of reducing affordable housing to the Island and will not achieve its objective of increasing the level. A radical re-think to the entire proposition is required. The identification now of additional housing land is required to meet the demand and maintain the balance of supply to the Island. It is required to maintain the affordability to the Island and to prevent the lack of affordable housing reaching		economic 'highs' and 'lows', they will average out over the 10 years of the Plan.		

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							critical levels during the period of the Island Plan.				
DP1016		Ray Shead	The Jersey Chamber of Commerce	Policy H3	Affordable Housing	Objecting	<p>This is not workable. The percentage required for affordable housing is too high, and it is suggested that if this is to be implemented it should be phased but starting at say 10% with an agreed maximum. A connected payment if a developer cannot reach the required percentage is not accepted. This policy could stop most private residential developers. There is no doubt that something has to be done to encourage the provision of some social housing in the future but this is being sought by levying stealth tax measures on developers rather than being 'pump primed' by government by way of various financial initiatives. The contribution by Property Developers to social housing is too onerous. The thought of the "unknown" has already prevented developers from investing money in Jersey and the current proposals will probably have an even more adverse effect. Developers are already faced with an inefficient and costly planning process, not only in the ever increasing fees that are being charged but in the knock on effects of poor advice, leading to multiple applications, resulting in additional costs due to the additional time involved and additional architects' fees as a result of these multiple planning applications. Developers are quite often referred to as "speculative developers" but speculation is largely being removed and the Planning Department needs to encourage speculative development to help meet their housing quotas. In order to encourage speculative development, no affordable housing should be required on speculative or windfall sites. A social housing provision or requirement should only be insisted upon where sites are rezoned specifically for category A housing. This will have the result of, for example, a farmer turning a field from what is worth very little in agricultural value terms to something that gives an increase in value but not a feeling that he has "won the lottery". The Draft Island Plan calls for affordable housing to be delivered on all developments of two houses or more and set as a minimum 40% of housing to be affordable on developments of six houses or more. With regard to category A housing sites, the requirement is for 75% to be affordable housing and 25% to be first time buyer. These proposals are draconian in the extreme and will prevent any Developer having any reasonable expectation of profitability. This will result in one or both of the following: (a) Where the Developer wants to make a profit the land value would have to be reduced to a level at which the owner of the land would not sell;</p>		The comments of the Chamber of Commerce are noted.	<p>The comment effectively advocates the existing method of procuring affordable housing by designating low value land specifically for this purpose, which has proved a particularly effective under the 2002 Island Plan, as an alternative to Policy H3. This would necessitate identifying sufficient low value land (either green field or glasshouse sites) to accommodate the target number of homes to be delivered by Policy H3 (600-650). This would necessitate designating green-field and former glasshouse sites for development, which has proved unacceptable to the public at large, particularly in those Parishes which are best placed to provide it in accordance with the Plan's Spatial Strategy. The Minister has assured the Constables of the parishes that he will not propose the development of sites for affordable housing against the wishes of the relevant Constable. The potential loss of 3 of the sites proposed in Policy H1 will necessitate finding suitable new sites to replace them</p>	New sites need to be found to replace Samares Nursery, Cooke's Nursery and Longueville Nurseries.

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							and/or (b) The Developer knows he will not make a profit and will therefore invest his money elsewhere. Chamber is aware that this is beginning to happen with Jersey developers making inroads into the Guernsey, Alderney and UK markets. It is suggested that the Planning Department, in conjunction with some local developers, form a small working party to undertake desktop appraisals to consider how a development would stack up under the current Island Plan Regulations and under those that are proposed. This may convince the Planning Department that if it continues along the present route, the repercussions could be dire for the supply of new housing units into the market over the next decade.				
DP1117		Mr Ben Ludlam	C Le Masurier Ltd	Policy H 3	Affordable Housing	Objecting		This is probably the most significant proposal in the plan and which will have a negative effect on the provision of residential accommodation . It is unrealistic to apply the policy to developments of more than 2 units and this is far higher than the threshold in the UK, also the 40% provision for affordable housing is set too high. The potential provision of this sector of housing at these levels will render projects unviable, as the policy immediately reduces the existing land value significantly, for developers and thus no development will take place, further increasing the housing shortage. This policy will affect the land holdings of the States of Jersey very significantly and Property Holdings, for the Treasury Department, should provide detailed analysis of the affect on value and the potential impact on States finances. The private sector cannot be expected to effectively be providing housing, at no cost, for the States of Jersey on the proportions detailed and further work / research needs to be undertaken and the effects on the market.	The comments of C Le Masurier are noted.		The Minister is likely to reduce the proportion to 12.5% for the first year, rising to 20% by year 5 and the threshold site size to remain at 2 homes and above. For developments with a capacity of two-eight units of accommodation the affordable housing contribution may be made in the form of a commuted sum payment to enable the delivery of affordable homes off-site, elsewhere.
DP1180		Mr Roberto Lora		Policy H 3	Affordable Housing	Objecting	The Draft Island Plan White Paper proposes that the town of St Helier accommodates the bulk of new residential developments. However, this level of provision within town is considered to be unrealistic, and our reasons for reaching this conclusion are as follows:	Not all islanders have aspirations of living in flats in town, especially those originating from the country Parishes. The majority of category A housing sites to date have been on green field sites (including the most recent re-zoned in St Saviour and Trinity) and new local homeowners are not likely to want anything different, as they will have general expectations of owning homes with their own dedicated car parking, private gardens, and a safe environment. Realistically, St Helier is unable to deliver such accommodation or	Mr Loa's comments are noted.	Table 6.2 indicates that only a third of the planned new homes will be in St Helier (excluding the Waterfront), and it is not intended that they are all apartments. 1700 homes are anticipated to be achieved on windfall sites through the normal application process elsewhere in the Island.	Noted by the Minister

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								<p>homes. This distorted weighting in favour of flats (i.e. 40% requirement for affordable/social rental) is not likely to encourage young families who aspire to live in houses with gardens to stay in Jersey, and therefore encourage outward migration of these people (middle Jersey), which will be counterproductive to the Island's Strategic Policies in relation to an ageing population, payment of tax, social security, pensions, and therefore the long term interests of the economy as a whole. Residential land value will NOT outweigh the existing land values. Therefore, in our opinion, there will be no commercial incentive to develop or redevelop existing sites in town for residential purposes. Also, the concept of requiring windfall sites of two houses or more to provide 40% affordable housing, thereby further reducing the value of land by 40% (quote BNP Paribas real estate) will only exacerbate this lack of incentive, especially for the larger sites identified by PBS Planning such as the Randall's site Ann Street Brewery, Le Masurier's land and so on. This Policy has wider reaching implications in our opinion, that will de-value all land values! Therefore, like the prime hotel site policy introduced in the late 1990's, banks will be unwilling to invest in the existing commercial operations because their exit strategy will have been effectively removed. Therefore, the equity within these properties would be significantly reduced. During this extremely variable economic climate banks are less likely to take the risk of lending to clients in these less favourable in circumstances, be it for mortgages, second charges, or whatever. The wider economy will therefore suffer as a consequence of this Affordable Housing Policy. As soon as this effect was identified by the hotel industry previously, the Prime Site Policy was removed at the time. Less onerous affordable housing policies has caused the U.K. house building industry to stall, as local planning authorities are not willing to relax their policies in light of the credit crunch. We find it most strange therefore that a recently failed U.K. policy is now being seriously considered within this document, and the States of Jersey. We are mindful that the market is already ahead of the adoption of The Island Plan, this is beginning to produce a crisis of confidence in whether to purchase sites now, fearful that because the affordable policies have been flagged, these will be applied to their sites, making their developments unprofitable.</p>			

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								Consequently several of the islands larger HNW clients/developers are opting to turn their backs on Jersey, and are looking outside of the Island to invest money. We are deeply suspicious in respect of St Helier providing houses. Realistically St Helier can only really provide apartments, and if these also have to 'pepper pot' affordable units with non-affordable units, what tends to happen is that affordable housing is provided for the lower floors, with open market units on the upper floors. The affordable units then de-value the open market units, further compounding the lack of viability, and hindering the release of land until a new policy is proposed. Furthermore, the occupiers of the affordable units are unable to pay the service charges for these relatively expensive buildings, leading to their early deterioration or further financial problems. The requirement to mix Category B and affordable houses in developments of six houses or more will further only serve to de-value to Category B houses and will make development of windfall sites far less attractive to developers. The fragmented ownership of land (especially in St Helier) causes great difficulty in assembling small sites to enable comprehensive developments to proceed owing to the various expectations of the owners. The States of Jersey have also shown themselves to be very reluctant in using Compulsory Purchase powers, since these are considered to be too draconian in our culture, and therefore politically unacceptable. The States have also suffered very high legal costs when they last used these powers (Lesquende, St Brelade) which has been a disincentive for them to use these statutes in the recent past.			
DP160		Mr Stephen de Gruchy		Policy H 3	Affordable Housing	Supporting	Support with Caveat Regarding the penultimate paragraph I feel that the rounding up should only occur when the figure arrived at is more than 0.5 of one unit. Otherwise, developers of smaller areas are disadvantaged. For example in a 6 unit development, Policy H3 would actually impose an affordable homes figure of 50%, not the stated 40%. (i.e. 6 units x 40% = 2.4 units, which Policy H3 would require to be rounded up to 3 units.)		Noted		Support is noted by the Minister
DP239		Bill Sarre	CBRE	Policy H 3	Affordable Housing	Objecting	Ideal Scenario My opinion is that the ideal scenario is not to place affordable housing onto brown field sites, thereby maximizing the number of units that are constructed in the Island. The States would then become responsible either through the existing department or a new vehicle, to provide social housing in conjunction with the green field sites it has rezoned. This vehicle could benefit from existing sites	The plan seeks to transfer the burden of providing affordable homes purely from rezoned land to sites in "brown field" locations. This provides major problems and I would strongly request this is substantially revised or dropped. The policy worked with rezoned green field lands as there was still a material increase in land value in the rezoning so that the housing restrictions were pale	The comments are noted and understood, in particular		Minister is likely to recommend to the Inspectors that this proportion will be reduced to 20% and apply only to sites over 10

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							owned by the States, e.g. JCG perhaps together with some funding to kick start schemes. The development vehicle would then seek to provide housing either through development of sites or the purchase of existing units (e.g. houses, blocks of apartments) and utilise them to provide the housing required by the Island. Sources of Funding - Development Tax Any taxation on development has historically been seen to have a negative consequence and any consideration should be thoroughly tested and thought out. However, it is possible that a simple flat rate tax at a relatively low level, starting for larger schemes could have a reduced impact and yet raise funds for affordable homes. I am no expert, but I am led to believe that in the UK, frequently schemes of 10 units or above are treated separately and this maybe a sensible level, as you are dealing with more established developers and larger sites. Starting at 2 units is too low. The flat rate could either apply to the site value, end value on a square footage basis. As it would be simple and known in advance would have less of an affect, would not require additional bureaucracy and not have schemes designed around the policy. Any flat rate tax should still have the ability to be contested if schemes are unviable as it would be in the interest for the tax to be waived and new housing to be provided in the Island. Affordable Housing - Scheme Deferral Whatever is decided within the planning regime, I would strongly recommend that it is agreed and acknowledged that any new system will not take place for 12 months after the Island Plan is implemented. This will allow current sites and schemes to be considered providing necessary housing and also economic stimulation. If developers are concerned that they may be affected by a policy which they do not know in advance, they would inevitably take a cautious line until the policy is determined. Effectively, the market will stall and the pipeline of housing will stop from such schemes. In any event, we were informed at the meeting that it is envisaged that the affordable homes policy would take time to filter through and as such a referral of 12 months would seem to accord with this policy, but at the same time, give a signal to developers. I would also raise the concern of bankers who would be unwilling to lend on schemes with such risk having been flagged by values.	table to both the land owner and developer. In the absence of the States buying land, the provision of new housing requires willing developers (buyers). The migration of this policy to include brown filed sides will have the following consequences: i) It will reduce urban site values including the States owned portfolio. ii) It will reduce the number of infill development schemes (windfall sites). Frequently, existing site values are similar to a housing scheme, as such these restrictions would make some new schemes unviable. iii) It will complicate the planning system, increasing developer and States costs. It will increase bureaucracy and manpower requirements required to vet the financial viability of the schemes, the input costs and make recommendations. It will slow down the system. iv) It will increase the risk and general levels of concern in dealing with speculative sites reducing the incentives for developers to provide such windfall. v) It could potentially provide affordable housing in inappropriate prime locations which would be a poor use of resources. This could also affect the value of the open market housing within the scheme, further reducing the viability and site value. vi) It could affect the design of scheme as plans are drawn to reduce the impact of the policy rather than maximize the site's potential. vii) It could complicate schemes as specifications, layouts and facilities are tailored between the different types of accommodation (e.g. reduce specification of kitchens, bathrooms etc, reducing economies of scale and increasing costs of building). viii) It requires a new process to be created and monitored analysing the cost and viability of schemes. ix) As the policy could start from as low as two units, it could provide a particularly heavy burden on small developers and existing owners. Effective Affordable Homes on Site Values I have undertaken a basic analysis of the reduction in site values due to the request for 40% affordable homes. Each site will vary as would the type of affordable home, but it maybe worth noting that on our estimates a site value reduction of a minimum of 30%, probably much more, is easily possible. Accordingly, it is clear to see why some sites would no longer be viable with this provision and whilst the incentive to convert sites would be materially reduced.	the impact on viability and the consequential danger that landowners will withhold sites from development. The States may well need to consider using part of its own property portfolio to provide affordable housing, should the existing proposed measures fail to deliver the required numbers		homes. The Minister may also defer implementation of Policy H3 for 12 months to allow sites on which where there are existing agreed values to clear the planning application system
DP262		Mr Mike Waddington		Policy H 3	Affordable Housing	Objecting	Affordable Homes However, the Draft Island Plan is contradictory aswell dogmatic. If the concept is to redevelop St Helier for homes rather than the		The comments		The Minister is likely to reduce the proportion to

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							countryside, why apply the equally onerous requirements for a 40% component of affordable homes to new developments to each? We need a more constructive approach to the provision of affordable homes, particularly in town where land values are at their highest. Our politicians need to encourage regeneration St Helier, rather than put legislation in place to force developers to provide it which, if as demanding as currently proposed, will simply stop it happening. More "carrot" and less "stick". Lifting the burden for suitable residential homes in St Helier could include: a. tax breaks for developers b. a lighter touch to listed building protection c. less red tape in planning- fast tracking the right types of projects d. more height and density to compensate for high land values and better quality homes e. selling shell-only homes to first-time buyers to save money f. teaming up with Highlands College trainees to help finish off the shells with grants from the States g. subsidizing developers to create double-height living spaces. European apartments are often described by volume rather than floor area?		regarding differentiation in Policy H3 between the countryside and the built-up areas are noted, and given the higher existing land values in the latter (particularly St Helier) could prevent the regeneration of St Helier.		12.5% for the first year, rising to 20% by year 5 and the threshold site size to remain at 2 homes and above.
DP415		Mr Marc Burton	Institute of Directors	Policy H 3	Affordable Housing	Objecting	Affordable homes - whilst we would support some requirement for the provision of affordable homes, the current intent of 40% of every development is far too high and unworkable as: The trigger level of 2 units or more is far too low and needs to be increased, particularly as the majority of sites can fall onto the 5 units or less category; The requirement to provide a viability assessment with the planning application will be too late in the process or more sites will have to be purchased on a 'conditional' basis as developers will not take the risk in buying sites on predetermined values when the requirements could change significantly at the planning stage; Further consultation and agreement will be required with the construction industry and developers concerning the 'commuted sum' and calculations used to determine the value of affordable homes particularly as the document states that the Minister will determine the tenure of all proposed affordable homes; Consideration needs to be given on the timing of the introduction of the affordable homes percentage relative to sites currently in the process of either being purchased or with a pending planning application. An introductory period would be	Unless a lower figure is agreed, 40% will effectively stop all development and thus increase demand and further accelerate the value of the current housing stock making property even less affordable for first time buyers etc; Lessons should be learnt from the mistakes in the UK where mixing social classes does not always work and the targets set have not been met; 40% will stop development overnight and land values will drop considerably meaning owners will not sell; There is no back up or evidence on how 40% has been calculated and this figure does not appear to be supported from the numbers stated as the future requirements for the island; At 40%, effectively the private sector is being asked to subsidise the public sector to provide the shortfall in affordable housing; See attached letter	The comments are noted, particularly the impact on viability and the disincentive for landowners to make land available for development. The Minister is likely to reduce the proportion		The Minister is minded to reduce the proportion to 12.5% for the first year, rising to 20% by year 5 and the threshold site size to remain at 2 homes and above.

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							advisable; Consideration should therefore be given to providing possible incentives to developers etc. to ensure development does continue and is not stagnated. On the basis that the percentage is reduced to a more reasonable level, less incentives will be required however at 40% serious thought will be required i.e. tax breaks, quicker planning process for these sites etc; See attached letter		n to 12.5% for the first year, rising to 20% by year 5 and the threshold site size to remain at 2 homes and above.		
DP546		Mr Paul Harding	The Association of Jersey Architects	Policy H 3	Affordable Housing	Objecting	We submit the States should be seeking to control release of land (other than 'Windfall' sites in the Built-Up area in private ownership) into private housing development by reaching agreements with landowners as outlined in para. 9.3 (see AJA submission), funding and implementing servicing of the land, then selling on the sites for affordable housing to developers who will build on them.	The AJA is of the common opinion that the requirement to provide social housing from private developments will, quite simply, bring all private housing developments over 2 or more units to a complete stop. It is simply unrealistic to expect private housing purchasers, through the developer, to pay for 40% of the development being subsidised - whether this is by way of a commuted payment or actual homes makes no difference. For example a small development of 3 houses will require the developer to make a commuted payment equating to allocating 2 of those houses as low cost homes. To pick on just one aspect of the policy as drafted ? in all other parts of the world it is an accepted economic fact of life that affordable housing is located in less exclusive locations, but if it were to become a planning requirement that a redevelopment of, say, an exclusive sea-front site in Jersey had to contain at least 40% of affordable housing that seems just plain daft and against all intuitive logic. The 'opt-out' clause ? basically a stealth development tax ? could kill all development stone-dead and seems fraught with difficulties (eg: who is to decide whether a development is 'economically viable' and what criteria will be used?). Has a proper in-depth study been carried out into the economic realities of this policy? If so, we need to see the evidence and results. There can only be three possible outcomes from this Policy: ? a) Private housing development stops ? result 2009 Draft Plan housing projections fails and demand outstrips supply of existing homes, therefore pushing up prices. b) Housing land prices are pushed down - result landowners don't sell for housing and/or makes regeneration unviable, with the same end impact upon housing market. c) The	Noted	The comments are noted, particularly the impact on viability and the disincentive for landowners to make land available for development. Although this method of procuring affordable homes has worked before, notably at Belle Vue, the likelihood of the States acquiring land to pass-on to developers to build affordable houses is limited as there is insufficient capital funding in place for acquisition. However, it may be necessary to use already acquired States land to provide affordable housing should the proposed policies fail. The Minister is likely to reduce the proportion to 12.5% for the first year, rising to 20% by year 5 and the threshold site size to remain at 2 homes and above.	The Minister is likely to reduce the proportion to 12.5% for the first year, rising to 20% by year 5 and the threshold site size to remain at 2 homes and above. For developments with a capacity of two-eight units of accommodation the affordable housing contribution may be made in the form of a commuted sum payment to enable the delivery of affordable homes off-site, elsewhere.

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								cost of the affordable housing commuted payment pushes up housing prices in excess of other influences making housing even more un-affordable than at present. This Policy is hostile to the regeneration of St Helier, where it is more expensive to redevelop sites. Many private house purchasers will also be put off buying a house where 40% of the homes comprise social housing as the mixing of social and private housing is known to be problematic. The AJA would like to point out this Policy is seeking to place a levy on expensive land, rather than controlling the value enhancement of cheaper land.			
DP582		Deputy John Le Fondre		Policy H 3	Affordable Housing	Objecting	Affordable Housing - to impose a percentage of a 40% requirement on a small development seems an extremely considerable burden, and I would suggest that the financial impact of such a proposal should be carefully considered as to its potential consequences.		The comment is noted.		The Minister is minded to reduce the proportion to 12.5% for the first year, rising to 20% by year 5 and the threshold site size to remain at 2 homes and above.
DP610		Mr Bruce Willing		Policy H 3	Affordable Housing	Objecting	The policy of providing 'Affordable homes' is admirable, but naïve. As in the UK, the cost of housing is directly related to the contemporary difference between supply and demand. Only if the States wants to become its own 'developer' can this change significantly. Artificially imposing a ration of 'affordable homes' on each development is a real inhibitor to achieving the number of homes required. This policy needs urgently to be reviewed and revised.	When considering the development of affordable homes, the DIP is contradictory as well dogmatic, particularly in setting out a fixed, mandatory component of 40% affordable homes in any new development. If the concept is to redevelop in St Helier, rather than in the countryside, placing this restriction on the higher value urban land will inhibit developers, rather than encourage them. If St Helier is the chosen place for redevelopment (and if the States can be persuaded to include the Quennevais/St Aubin/Airport conurbation as an alternative or an additional development area) the following needs to be considered as a means of assisting urban regeneration within the DIP: a. Tax breaks for developers b. A lighter touch to listed building protection c. Less red tape in planning - fast tracking the right types of projects d. More height and density to compensate for high land values and better quality homes e. Selling shell-only homes to first-time buyers to save money f. Teaming up with Highlands College trainees to help finish off the shells with grants from the States g. Subsidising developers to create double-height living spaces. (European apartments are often described by volume rather than floor area.) In short the policy of providing 'Affordable homes' is admirable, but naïve. As in the UK, the cost of housing is directly related to the contemporary difference between supply and	It is recognised that this policy may be a disincentive to landowners to release sites, as the obligation placed on developers will force down the land value. The bulleted suggestions for enabling the provision of affordabl	The effect of supply and demand on the sale price of housing is understood. Providing a proportion of affordable housing as part of 'market' developments works elsewhere, and the current Island Plan has been successful in achieving the provision of social rented and discounted price first-time buyer housing on sites zoned for the purpose. The 40% target on sites over 6 dwellings is 'worst case', and the likelihood is that the Minister will recommend to the Inspectors that reduce this proportion will reduced to reduce the proportion to 12.5% for the first year, rising to 20% by year 5 and the threshold site size to remain at 2 homes and above. The policy needs to be firm and prescriptive to ensure consistency, but there will be a viability test to assess whether each development is viable. Where not, a lower target for affordable provision will be agreed. In order achieve the required numbers of affordable	The Minister is likely to reduce the proportion to 12.5% for the first year, rising to 20% by year 5 and the threshold site size to remain at 2 homes and above.

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								demand. It is a market. Only if the States wants to become its own 'developer' can this change significantly. Artificially imposing a ration of 'affordable homes' on each development is a real inhibitor to achieving the number of homes required. This policy needs urgently to be reviewed and revised.	e housing are noted.	homes over the plan period 2010-2019, it will be necessary to zone, or otherwise identify, sites for approximately 350 homes. See policy H1	
DP619		Mr Paul Bradbury	States of Jersey	Policy H 3	Affordable Housing	Neither		I respond on behalf of the Migration Advisory Group, and with specific reference to the Laws administered by the Population Office on behalf of those Ministers. Our primary objectives under the Laws we administer, and in relation to the Migration Policy, are to manage migration in line with the Population and Economic Growth Policies, and in a manner that seeks to minimise aggravation on our housing stock, and more generally manages demand on other Island resources. Accordingly, our comments are confined to these specific responsibilities. With this in mind, we would seek to be assured that the provisions around affordable housing - such as the requirement to produce 40% affordable housing on developments over 6 units where this is viable - do not adversely effect incentives to develop, especially on brown field sites, such that sufficient supply of housing is not forthcoming to meet population objectives. Should this occur we would be concerned about the impact on the general affordability of housing , notwithstanding any shortfalls in affordable housing. In a similar vein, we would want to be assured that the levels of affordable housing through the affordable housing gateways does not adversely effect the provision of sufficient housing outside these gateways, again, with reference to the level of supply needed to meet the population objectives and bearing in mind the finite and limited land resources of Jersey. Ultimately, this reflects our general concerns as to the need for housing to be affordable across the board. All the above is said appreciating the other needs that need to be reconciled in the plan, in particular, the need to preserve our environment and to promote economic growth, in which we also take a keen interest, and the need to provide affordable paths to home ownership and suitable housing for all sections of society, including those less advantaged. I should finally add that the other specific housing policies do not present us with any particular concerns in so far as the Laws administered by us on behalf of MAG are concerned.	Noted. The comment on viability is understood, and the policy will in all likelihood be amended to make it less onerous.		Amend the policy so that it is less onerous as far as viability is concerned

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DP658		Mr Mark Le Boutillier	GR Langlois	Policy H 3	Affordable Housing	Objecting	Policy H3, The introduction of 40% of affordable homes across all Cat B sites:- We believe that this policy will dissuade landowners and developers from developing houses in the much needed mid to lower end of the market. Developers are more likely to plan schemes with properties at the higher end of the market as the financial contribution towards affordable housing would not seem to differ greatly between mid and higher priced homes.		The comments are noted		The Minister is minded to reduce the proportion to 12.5% for the first year, rising to 20% by year 5 and the threshold site size to remain at 2 homes and above.
DP663		Mr Martin Clancy	Dandara	Policy H 3	Affordable Housing	Objecting	I write to register my dissatisfaction with the current proposed affordable housing policies contained in the current draft Island Plan. I previously made my views known during meetings with Kelvin MacDonald as to affordable policy and nothing was taken on board. We are at the very front of developing in Jersey and an introduction of a policy of this kind will result in huge house price inflation due to lack of supply in the housing market.	In out line terms the effect of this policy would mean: A reduction of at least 400/0 in land values of brown field land, resulting in land owners not willing to sell for residential as the current use as alternative uses, commercial, retail etc would give them a better return . Sites where say a dozen apartments could be planned would be reduced to say 2 or 3 houses in order to reduce the affordable housing liability. Development finance is not available in the market place as it once was, imposing the 400/0 contribution will make the proposals even less attractive. Any affordable policy will impact as out lined above, but I agree that it has to be delivered in some manner, as the Islands negative view of supplying homes in the countryside is well documented and I believe that there will be little or no zoned land in the new Island Plan. The policy should be amended to introduce a level between 5% to 10% affordable homes on new sites coming forward for planning. This percentage depending on how the supply line is met, the market performing etc could be increased and kept under constant review by the Minister. The only element in the development process which pays for this contribution is the land price, so the policy has to be introduced only on new sites which are not under contract to purchase or which have planning or going through the planning process. If there is a policy of affordable homes implemented the following issues must be considered and where appropriate amendments put in place to ensure that the policy works. The introduction of share equity is relevant to this as the policy came in but the mortgages, legal structure etc was not considered and this led to delays in its implement at ion. Items that will need consideration prior to introducing a policy: 1. Is there a demand for the affordable properties. 2. Who will take on the properties and where will the finance come from. 3. Are Housing Trusts an acceptable social housing provider any longer, or does the Housing Department want to control	The comments are noted, and in particular those on viability and the disincentive to landowners.	A 5%-10% proportion of affordable housing on market sites will not, of itself, deliver sufficient affordable homes to meet the 10 year target	The Minister is minded to reduce the proportion to 12.5% for the first year, rising to 20% by year 5 and the threshold site size to remain at 2 homes and above.

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								<p>everything. 4. At what price levels are the affordable sold at. 5. A feasibility mechanism in place to justify a reduction in the amount of affordability on a site, i.e. there maybe a site that the States Planning Department may wish to see developed for housing, a feasibility would be required to show its current use value makes it undevelopable under the current percentage requirement, and thus the percentage maybe reduced of affordable percentage maybe considered appropriate to allow the scheme to commence. 6. A valuation mechanism to allow the transfer of "social units" from one site to another or indeed a payment to wards a "social fund" if little or no social units are planned on a site. 7. In order to protect the countryside consider housing higher levels of affordable housing in the rural areas. 8. Maybe consider a reduction in Percentage for Art costs and Planning and Building fees which have risen considerably in recent years. 9. Stop the implementation of the new environment code for sustainable homes policy which will increase the build costs substantially. 10. Consider a 1 year holiday after the introduction to allow for a valuation in the residential land market to "allow" for the affordable content. 11. All rezoned green/glasshouses land to have 100% social content, or 50% social and 50% shared equity. I do hope you find my comments useful, please contact me if you wish to discuss these issues further.</p>			
DP684		Dr Stephen Izatt	Waterfront Enterprise Board Limited	Policy H3	Affordable Housing	Objecting	<p>I write following our recent meeting and your request for a written response from the Waterfront Enterprise Board Limited ("WEB") in respect of the White Paper Draft Island Plan ("the Plan") Policy H3 Affordable housing. Under the Plan, development is to be concentrated on brownfield sites in accordance with the objective of the States of Jersey Strategic Plan to "identify sufficient appropriate development sites for housing - without further rezoning of green areas". The Plan further states that "the provision of new homes during the Plan period will provide the mechanism to lead urban regeneration, particularly in St Helier" (paragraph 6.5). WEB is concerned that as a result of the significant proportion of affordable housing that will be required in new housing schemes under the mechanism proposed; limited development on brownfield sites will take place. As a result, not only will the delivery of affordable housing be impacted but the supply of category B homes will be significantly reduced. Background It is appreciated that Category A Housing includes Social,</p>		<p>The comments of WEB are well argued and are noted.</p>	<p>1) There are concerns that Policy H3 could discourage landowners bringing their sites into development. The Minister is likely to reduce the proportion to 20% and the threshold site size to 10 homes and above. He may also defer policy H3 for 12 months to allow sites on which values have already been agreed to clear the planning application system. 2) The mix of Category A units provided in the affordable housing provision will be included in Supplementary Planning Guidance - probably updated on a bi-annual basis. 3) The reduction in units will arise predominantly from re-vamping of Housing Dept. sites - in particular improving housing quality by</p>	<p>The Minister is likely to reduce the proportion to 12.5% for the first year, rising to 20% by year 5 and the threshold site size to remain at 2 homes and above. For developments with a capacity of two-eight units of accommodation the affordable housing contribution may be made in the form of a commuted sum payment to</p>

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							First Time Buyer, Shared Equity and Over 55's housing and there will be different land values associated with each. As a rule of thumb, for example, the rental income from social housing can only service the construction costs of a unit of housing and therefore the land upon which social housing is built has a zero value. As over 55 housing can be sold on the open market to any person over the age of 55, the land value for a 2/3 bedroom house could be circa £200,000. The Plan however does not state the proportion of Social, First Time Buyer, Shared Equity and Over 55's housing within the Category A Housing bracket and it is therefore not possible to accurately assess the average land residual value for Category A development. Without detailing out the proportion in the Plan, landowners and developers will focus on First Time Buyer and Over 55 housing as these deliver the highest returns; this may not however match the need. I enclose a spreadsheet that illustrates the significant differences in land values within the Category A housing class. The 2002 Island Plan rezoned a number of sites for Category A Housing and I believe that it was Senator Ozouf who recommended the introduction of the 45:55 split whereby 45% of a site would be used for the provision of social housing and 55% for first time buyers. It was made clear to developers that the government would not be purchasing any of the social housing units and that the Housing Trusts could only afford a purchase price equivalent to the capitalised social rents and not at the first time buyer prices that the developers wanted. There was to be no government subsidy for the provision of new social housing stock. This policy worked on these sites as they were green fields which, prior to the 2002 Island Plan, only had an agricultural value. The land value for the first time buyer plots, albeit only 55% of the total site, was still higher than the agricultural value and therefore development proceeded. WEB questions supply The need for affordable housing to be developed is recognised and the fact that there will be no government funding is acknowledged. In terms of demand, paragraph 6.92 identifies, albeit at a high level, 600 affordable units are needed in the first five years of the Plan. Paragraph 6.92 identifies that a detailed demand study will be required to more accurately assess the need. The Plan sets out that 550 units can be delivered in the first 5 years of the Plan (Table 6.2). However, there is delivery of 850 new units less 300 "outworn sites". Outworn sites are described in paragraph 6.50 as follows:- "It is estimated that during the Plan period there is likely			merging bedsits into one bedroom flats, and small one bedroom flats into two bedroom flats. 4) the supply side of affordable housing units indicates that there is 10-year requirement for about 1000 units- approximately 25% of total demand. Table 6.2 indicates that policy H3 will deliver 200 units in years 1-5 and 400 units in years 6-10 (from Windfall and Town of St Helier)	enable the delivery of affordable homes off-site, elsewhere.

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							<p>to be a loss of the total number of housing units associated with the planned re-development and upgrading of old outworn housing estates: these are generally owned and managed by the States of Jersey Housing Department. It is estimated that this will result in a net reduction of 300 homes." WEB questions the above description as to why there will be a reduction in the number of Category A units unless the sites that are owned by the States of Jersey are to be developed for Category B units or are to be left undeveloped. The recent phased redevelopment of Les Squez housing estate for example did not result in a reduction of the category A stock as no refurbished units were converted to Category B housing and the site was not to be left undeveloped in perpetuity. Assuming WEB is correct in its above assumption, the Plan therefore proposes 850 new units of Category A Housing are provided in the first 5 years of the Plan against an assessed demand for 600 units. Of the 850 new units a total of 650 affordable homes are to be provided on greenfield sites (225 on new greenfield sites set out in the Plan, 125 from the 2002 Island Plan H2 sites and 300 from the amended 2002 Island Plan). It is considered that as these developments are to take place on greenfield sites, these 650 units will be capable of delivery without any financial assistance from government and therefore should be delivered. Table 6.2 illustrated that in the first 5 years of the Plan 200 units are required to be provided on brownfield sites via the affordable housing mechanism and 400 units in the second 5 years of the Plan. However, assuming the 40% affordable housing mechanism, and assuming this mechanism worked, a total of 880 additional affordable units would be provided in the first 5 years of the Plan ((2000+200)x40%) and 800 in the second 5 years of the Plan ((1,600+400)x40%). These delivery figures significantly exceed the demand (total affordable demand =1,200 units: total affordable supply =2,405 units). WEB questions this significant over supply of affordable units. WEB concerns with mechanism Ultimately, developers will not be prepared to fund affordable housing out of their developer's profit and, as a result, it will be the land value that will have to be reduced in order for development to proceed. The 40% proportion of affordable housing proposed on all developments will dramatically reduce the value of all land on the Island. This carries two main issues:- 1) The Plan proposes that the majority of new residential development should take place on brownfield sites. Brownfield is defined as land that</p>				

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							<p>has a previous use. A landowner will therefore only be prepared to sell his land to a developer where the residual land value that the developer is prepared to pay is greater than the value of the current activity taking place on that site. 2) The States of Jersey is the single largest landowner on Jersey and under its current proposals to form States of Jersey Development Company is considering developing its land assets that are not required for the provision of public services. The proposed mechanism will dramatically reduce the value of the States of Jersey land holdings and may result in sites that require significant infrastructure having a negative site value and therefore only being capable of development with a States subsidy. It is considered that the 40% requirement for affordable housing will have a significant negative impact on end values which will filter down to significant reductions in land values. The overall effect will undoubtedly be that a number of brownfield development sites that are needed to be developed in order to deliver category B homes will be impacted by this proposal as the site residual values will be lower than existing use values. The result will be these brownfield sites will not be sold for development and there will be a significant reduction in the supply of Category B properties. The risk that this mechanism may have a negative impact in bringing forward development has been identified in paragraph 6.109 of the Plan which states "it will be necessary to agree a realistic proportion within the target percentage". The practicalities of negotiating a reduced contribution between Planning and Environment, Property Holdings, a Developer and a Landowner will without doubt frustrate and seriously delay the development process. A developer will also be unlikely to finance the considerable pre-development costs with the uncertainty surrounding this significant expense. WEB also questions why the development of a single unit of housing should escape from contributing towards affordable housing. Most single unit developments are on windfall sites that could contribute financially towards affordable housing. WEB suggestion It is WEB's view that there is an alternative mechanism which should be applied to all new residential development regardless of the number of units. The proposal is for a commuted affordable housing sum to be paid to the States of Jersey on completion of construction and before any occupation based on the sales value of the development. Attached is an appraisal of the WEB proposal illustrating the impact on land value</p>				

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							together with a comparison against the Plan proposed mechanism. The WEB proposal has the benefits of being equitable, easily calculated, provides certainty for Developers and Landowners, and should be financially afforded by development on brownfield sites that do not require significant public infrastructure. WEB considers that the policy as proposed under the Plan carries the risk of deferring the much needed and relied upon development of brownfield sites. Any significant reduction in the delivery of new housing units will once again fuel large increases in property prices as it did in 1998 and will have the negative effect of resulting in the widening of the financial and economic divide between home owners and non-home owners.				
DP693		Mr Andrew Fleet	Style Group Ltd	Policy H 3	Affordable Housing	Objecting	I. Item 6.92, referring to the Macdonald report states that the latent demand demonstrated in the 2007 Housing Needs Survey and taking into account anticipated sources of supply of other Category A homes to arrive at an interim indicator of need for affordable homes, of 600 units of accommodation over a five year period. This represents 15% of the overall housing requirement, why therefore has the proposed requirement been set at 40%? 2. The UK requirement is set at 35% with a trigger level of sites of 15 units or more, why is Jersey requiring 40% and a trigger level of sites of 2 units or more? 3. Item 6.96 requires the viability of any policy for affordable housing not to deter land owners from placing sites on the market or developers from developing market housing; any requirement for affordable housing on sites of below 5 units will significantly affect the viability of the site, thus creating a natural reluctance for new sites coming to the market place. Evidence shows that this reluctance happened to a number of H2 sites from the 2002 Island Plan. 4. Due to the character and size of the Island, many new sites , particularly windfall sites are likely to be 5 units or less. This reduction of sites coming to the market place as referred to in item 3 above will reduce the volume of house building, causing a reduction in housing supply. 5. This potential reduction in housing supply will create the corresponding increase in demand, consequently creating an increase in house price. This increase in house price will inevitably increase the gap of affordability for Islanders accentuating the problem of the lack of affordable housing in Jersey . The proposed policy potentially has the effect of accentuating the problem, not easing the problem. 6. Item 6.97 proposes the introduction of the submission of a viability assessment with the planning application; this will		The Style Group's comments are noted	Most of the Category A houses provided in the first 5 years will come from sites already designated, or proposed for that purpose. It is anticipated that the policy H3 will need to deliver between 600-650 homes over the ten year plan period - i.e.. about 65 a year. The Minister is likely to reduce the proportion to 12.5% and the threshold site size to 8 homes and above. He may also defer policy H3 for 12 months to allow sites on which values have already been agreed to clear the planning application system	The Minister is likely to reduce the proportion to 12.5% and the threshold site size to 8 homes and above. He may also defer policy H3 for 12 months to allow sites on which values have already been agreed to clear the planning application system. Supplementary Planning Guidance will need to be issued, probably bi-annually, to determine the mix of Category A Homes

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							not work; to submit a financial viability assessment with the planning application is too late as the site would have already been acquired at a pre-determined value. It can not be the role of the Planning Authority to dictate the viability of a project. 7. Item 6.97 also states the viability assessment model is being developed by the Minister in consultation with the development industry operating in Jersey. We question which parts of the development industry are being consulted on the viability assessment as we have not been consulted? 8. Item 6.98 suggests that the decision on viability can be discretionary and subject to negotiation - this is at risk of being abused and bringing a policy into disrepute. 9. Item 6.99 states the viability assessment model will be adopted and issued as supplementary planning guidance. Surely it must form part of this consultation process to be considered correctly in conjunction with the Policy on affordable housing. 10. Items 6.100 and 6.101 state that the value of a commuted sum will equate to the difference in value between an affordable home and a market home of the same type. How is the value of both the affordable home and a market home established in the many varied locations on the Island? What happens in the inevitable dispute on market values? I I . The requirement to mix Category B and affordable houses on developments of 6 units or more, will only serve to devalue the Category B houses and will make the development of windfall sites less attractive to developers. In addition, it will create a two tier system of housing developments, whereby privately owned homes will subsidize the adjacent affordable homes. 12. Item 6.106 places a reliance on private sector 'windfall' development, both within St. Helier and in other parts of the Built-up Area. It also states that there is no reason why, apart from developments of one housing unit, these developments should not make a contribution towards the provision of affordable housing. Item 6.109 recognizes by definition that 'windfall' developments are previously developed sites that currently hold a residual value. The requirement to now provide 40% of this previously developed site as affordable housing, or as a commuted sum, can never be viable on small sites as the residual value cannot be reduced. It is likely to result in the 'windfall' sites remaining unsold and undeveloped . 13. Within the Draft Island Plan, Policy EI provides for the protection of employment land; it requires that evidence must be provided to support any change of use including proper marketing of the site for 12 months to				

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							demonstrate that the use, no longer exists. This policy as drafted will prevent many employment sites (brown field sites) coming forward as windfall sites, further exacerbating the problem. 14. Item 6.107 states that a commuted sum can be applied for sites of less than 5 units; if the policy is adopted any commuted sum can only be made where the end use of the sum is identified for a specific affordable housing site. It can not be allowed to disappear into States funds as a form of development land tax. 15. Item 6.1 12 describes the varied tenure of affordable housing that will be applied to developments; this is unworkable as the values of social rented, Jersey homebuy, first time buyer or life long homes will vary and therefore the viability of each site will vary. Therefore to state that the tenure of all proposed affordable housing shall be determined by the Minister, based on current housing need is unworkable when a site has been acquired at a pre-determined land value, it is impossible to factor in uncertainty. 16. The proposed policy is likely to have a far reaching effect on the ability of first time buyers to acquire the first home on the Island created by an increase in the price of all new open market homes to subsidize all affordable homes in an effort to provide a viable development site. 17. We do not believe that derived targets are the answer to delivering affordable housing that the Island needs. The failure of the current target led system in the UK is completely illustrated by the fact that the delivery of new affordable housing has halved under the Labour Government in the UK.				
DP711		Caroline Harrington	The Jersey Construction Council	Policy H 3	Affordable Housing	Objecting	The Jersey Construction Council object to the proposed Draft Island Plan Policy H3 Affordable Housing and raise the following important questions and issues regarding the proposal. Whilst there are positive signs of the economy beginning to recover consumer spending will take time to return to pre 2008 levels. All these factors point to a slow recovery from recession for the property market with no 'boom time' housing completion levels to replenish housing forecasts within the foreseeable future. There is a saying that the worst possible things happen at the worst possible moment. This is certainly true for the impact caused by the reduced viability of housing projects. This began before the recession, but had been masked by the successful boom years. If true, the 'austerity circumstances' in which we now find ourselves combined with reduced viability and reduced sales value will act as a considerable disincentive for investment in housing projects. Project viability is predicted to be the post		The comments of the Jersey Construction Council are valued and noted	1) Most of the Category A houses provided in the first 5 years will come from sites already designated, or proposed for that purpose. It is anticipated that the policy H3 will need to deliver between 600-650 homes over the ten year plan period - i.e.. about 65 a year. The Minister is likely to reduce the proportion of affordable housing to 20% and the threshold site size to 10 homes and above. He may also defer policy H3 for 12 months to allow sites on which values have already been agreed to clear the planning application system. 2) The plan allows for a viability assessment to be undertaken to ensure that the proportion of	The Minister is likely to reduce the proportion to 12.5% for the first year, rising to 20% by year 5 and the threshold site size to remain at 2 homes and above. For developments with a capacity of two-eight units of accommodation the affordable housing contribution may be made in the form of a commuted sum

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							<p>recessionary period's most important issue, and will undoubtedly be made more difficult by the introduction of a 'tax' on development. Even before the current recession, many developers were concerned that their sites would become unviable unless there was some relaxation or deferment in new building regulations, percentage for art and eco-standards. With the proposed introduction of affordable housing the cost of meeting many of these requirements relies on ever increasing house prices and static land values this will now render many housing projects unviable. The fear is that the increased burden on landowners and housing providers will mean that they have little or no incentive to release land or build new homes on the scale necessary resulting in a reduction of new homes to the Island. The following specific issues relating to the proposed Affordable Housing Policy require debate and further detailed consideration:-</p> <p>1. Item 6.92, referring to the Macdonald report states that the latent demand demonstrated in the 2007 Housing Needs Survey and taking into account anticipated sources of supply of other Category A homes to arrive at an interim indicator of need for affordable homes, of 600 units of accommodation over a five year period. This represents 15% of the overall housing requirement, why therefore has the proposed requirement been set at 40%?</p> <p>2. The UK requirement is set at 35% with a trigger level of sites of 15 units or more, why is Jersey requiring 40% and a trigger level of sites of 2 units or more?</p> <p>3. Item 6.96 requires the viability of any policy for affordable housing not to deter land owners from placing sites on the market or developers from developing market housing; any requirement for affordable housing on sites of below 5 units will significantly affect the viability of the site, thus creating a natural reluctance for new sites coming to the market place. Evidence shows that this reluctance happened to a number of H2 sites from the 2002 Island Plan.</p> <p>4. Due to the character and size of the Island, many new sites, particularly windfall sites are likely to be 5 units or less. This reduction of sites coming to the market place as referred to in item 3 above will reduce the volume of house building, causing a reduction in housing supply.</p> <p>5. This potential reduction in housing supply will create the corresponding increase in demand, consequently creating an increase in house price. This increase in house prices will inevitably increase the gap of affordability for Islanders accentuating the problem of the lack of affordable housing in Jersey. The proposed policy potentially has the effect of</p>			<p>affordable housing delivered within the target figure does not render a development unviable 3) The Department recognises the potential for landowners to withhold sites if Policy H3 is not operated sensitively.</p>	<p>payment to enable the delivery of affordable homes off-site, elsewhere.</p>

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							accentuating the problem, not easing the problem. 6. Item 6.97 proposes the introduction of the submission of a viability assessment with the planning application; this will not work; to submit a financial viability assessment with the planning application is too late as the site would have already been acquired at a pre-determined value. It can not be the role of the Planning Authority to dictate the viability of a project. 7. Item 6.97 also states the viability assessment model is being developed by the Minister in consultation with the development industry operating in Jersey. We question which parts of the development industry are being consulted on the viability assessment as we have not been consulted? 8. Item 6.98 suggests that the decision on viability can be discretionary and subject to negotiation - this is at risk of being abused and bringing a policy into disrepute. 9. Item 6.99 states the viability assessment model will be adopted and issued as supplementary planning guidance. Surely it must form part of this consultation process to be considered correctly in conjunction with the Policy on affordable housing. 10. Items 6.100 and 6.101 state that the value of a commuted sum will equate to the difference in value between an affordable home and a market home of the same type. How is the value of both the affordable home and a market home established in the many varied locations on the Island? What happens in the inevitable dispute on market values? 11. The requirement to mix Category B and affordable houses on developments of 6 units or more, will only serve to devalue the Category B houses and will make the development of windfall sites less attractive to developers. In addition, it will create a two tier system of housing developments, whereby privately owned homes will subsidize the adjacent affordable homes. 12. Item 6.106 places a reliance on private sector 'windfall' development, both within St. Helier and in other parts of the Built-up Area. It also states that there is no reason why, apart from developments of one housing unit, these developments should not make a contribution towards the provision of affordable housing. Item 6.109 recognizes by definition that 'windfall' developments are previously developed sites that currently hold a residual value. The requirement to now provide 40% of this previously developed site as affordable housing, or as a commuted sum, can never be viable on small sites as the residual value cannot be reduced. It is likely to result in the 'windfall' sites remaining unsold and undeveloped. 13. Within the Draft Island Plan, Policy E1 provides for the				

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							protection of employment land; it requires that evidence must be provided to support any change of use including proper marketing of the site for 12 months to demonstrate that the use, no longer exists. This policy as drafted will prevent many employment sites (brown field sites) coming forward as windfall sites, further exacerbating the problem. 14. Item 6.107 states that a commuted sum can be applied for sites of less than 5 units; if the policy is adopted any commuted sum can only be made where the end use of the sum is identified for a specific affordable housing site. It can not be allowed to disappear into States funds as a form of development land tax. 15. Item 6.112 describes the varied tenure of affordable housing that will be applied to developments; this is unworkable as the values of social rented, Jersey homebuy, first time buyer or life long homes will vary and therefore the viability of each site will vary. Therefore to state that the tenure of all proposed affordable housing shall be determined by the Minister, based on current housing need is unworkable when a site has been acquired at a pre-determined land value, it is impossible to factor in uncertainty. 16. The proposed policy is likely to have a far reaching effect on the ability of first time buyers to acquire their first home on the Island created by an increase in the price of all new open market homes to subsidize all affordable homes in an effort to provide a viable development site. 17. We do not believe that derived targets are the answer to delivering affordable housing that the Island needs. The failure of the current target led system in the UK is completely illustrated by the fact that the delivery of new affordable housing has halved under the Labour Government in the UK. 18. In any affordable housing policy, it must maintain some degree of flexibility to ensure that it remains workable; therefore we suggest that the policy contains a mechanism to allow the affordable housing provision to be transferred to an alternative development. In addition the policy must contain a period of transition to allow the land market to adjust to make allowances for the imposed affordable content and to allow land acquired at full value prior to the introduction of the policy to be developed without affordable housing. Conclusion The introduction of affordable housing at this difficult time in the economy is likely to reduce the number of new homes constructed, increasing the demand, increasing the price and reducing the affordability for the first time buyer. Therefore the proposed policy of affordable housing will have the immediate effect of				

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							reducing affordable housing to the Island and will not achieve its objective of increasing the level. A radical re-think to the entire proposition is required.				
DP746		Paul Harding	The Association of Jersey Architects	Policy H 3	Affordable Housing	Objecting	<p>10.11 The AJA is of the common opinion that the requirement to provide social housing from private developments will, quite simply, bring all private housing developments over 2 or more units to a complete stop. It is simply unrealistic to expect private housing purchasers, through the developer, to pay for 40% of the development being subsidised - whether this is by way of a commuted payment or actual homes makes no difference. For example a small development of 3 houses will require the developer to make a commuted payment equating to allocating 2 of those houses as low cost homes. 10.12 To pick on just one aspect of the policy as drafted ? in all other parts of the world it is an accepted economic fact of life that affordable housing is located in less exclusive locations, but if it were to become a planning requirement that a redevelopment of, say, an exclusive sea-front site in Jersey had to contain at least 40% of affordable housing that seems just plain daft and against all intuitive logic. The 'opt-out' clause ? basically a stealth development tax ? could kill all development stone-dead and seems fraught with difficulties (eg: who is to decide whether a development is 'economically viable' and what criteria will be used?). Has a proper in-depth study been carried out into the economic realities of this policy? If so, we need to see the evidence and results. 10.13 There can only be three possible outcomes from this Policy: ? a) Private housing development stops ? result 2009 Draft Plan housing projections fails and demand outstrips supply of existing homes, therefore pushing up prices. b) Housing land prices are pushed down - result landowners don't sell for housing and/or makes regeneration unviable, with the same end impact upon housing market. c) The cost of the affordable housing commuted payment pushes up housing prices in excess of other influences making housing even more un-affordable than at present. 10.14 This Policy is hostile to the regeneration of St Helier, where it is more expensive to redevelop sites. Many private house purchasers will also be put off buying a house where 40% of the homes comprise social housing as the mixing of social and private housing is known to be problematic. 10.15 The AJA would like to point out this Policy is seeking to place a levy on expensive land, rather than controlling the value enhancement of cheaper land. We submit the States should be seeking to control release of land (other than 'Windfall' sites in the</p>		The comments of the AJA are noted	<p>The comments are noted, particularly the impact on viability and the disincentive for landowners to make land available for development. Although this method of procuring affordable homes has worked before, notably at Belle Vue, the likelihood of the States acquiring land to pass-on to developers to build affordable houses is limited as there is insufficient capital funding in place for acquisition. However, it may be necessary to use already acquired States land to provide affordable housing should the proposed policies fail.</p>	<p>The Minister is likely to reduce the proportion to 12.5% for the first year, rising to 20% by year 5 and the threshold site size to remain at 2 homes and above. For developments with a capacity of two-eight units of accommodation the affordable housing contribution may be made in the form of a commuted sum payment to enable the delivery of affordable homes off-site, elsewhere.</p>

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							Built-Up area in private ownership) into private housing development by reaching agreements with landowners as outlined in para. 9.3 above, funding and implementing servicing of the land, then selling on the sites for affordable housing to developers who will build on them.				
DP774	Mr Michael Stein	Mr Michael Stein	MSPlanning Ltd	Policy H 3	Affordable Housing	Objecting	Please find enclosed a report prepared by Pioneer, a specialist UK 'Housing and Development' consultancy with expertise in the subject of affordable housing and housing market analysis. The report was commissioned by this practice to seek an objective view on the matter of affordable housing, as proposed by Policy H3 in the White Paper relating to the Review of the Island Plan. The report's findings reinforce our concerns for the community of the island for the following reasons: Housing sites on brownfield sites will be less likely to be released for any housing (let alone affordable housing). Insufficient land has been re-zoned to enable affordable housing (glasshouse sites represent a limited opportunity to provide affordable housing - but apart from De La Mare Nurseries, Grouville and Samares Nurseries, St Clement, none have been re-zoned). Because of the quantum of affordable housing required for Cat A sites and windfall sites, landowners will be considerably less willing to release the land. The thresholds need to be reduced The conditions local to Jersey make the notion of delivering affordable housing on windfall sites even more difficult (ie small size of sites, landowner's expectation of value, the number of historic buildings, conservation areas and archaeological sites in town, the recent emphasis on the need for "spacious" development. This lack of supply will simply push up existing house prices even more, therefore out of the range of local people forcing locals, and in particular young families, out of the island. This is in direct conflict with the strategic aim of encouraging young people and families to reside on the island to help address the ageing population issue. Of equal concern is the finding that the basis on which the housing policies have been framed (specifically the basis on which housing need has been calculated) has been inadequately researched and this therefore requires further work before any of the housing policies can be adopted. We trust that you agree that the report is constructive in that it recommends modifications, albeit these do involve wholesale changes to the policies. I can confirm that we are very keen these matters are robustly considered at the forthcoming Inquiry and it is our intention that Mr Parker will attend to contribute to		The comments of MSP and the report of Pioneer, are both useful and noted. It is informative to know how housing requirements are calculated in the UK, but not necessarily relevant in Jersey, which is a single market area.	The comment effectively advocates the existing method of procuring affordable housing by designating low value land specifically for this purpose, which has proved a particularly effective under the 2002 Island Plan, as an alternative to Policy H3. This would necessitate identifying sufficient low value land (either green field or glasshouse sites) to accommodate the target number of homes to be delivered by Policy H3 (600-650). This would necessitate designating green-field and former glasshouse sites for development, which has proved unacceptable to the public at large, particularly in those Parishes which are best placed to provide it in accordance with the Plan's Spatial Strategy. The Minister has assured the Constables of the parishes that he will not propose the development of sites for affordable housing against the wishes of the relevant Constable. The potential loss of 3 of the sites proposed in Policy H1 will necessitate finding suitable new sites to replace them	The potential loss of 3 of the sites proposed in Policy H1 will necessitate finding suitable new sites to replace them

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							the debate. However, should you wish to discuss any of these matters in advance of the public examination, please do not hesitate to contact me.				
DP786		Senator Terry Le Main	States of Jersey Housing Department	Policy H 3	Affordable Housing	Neither	Paragraph 6.107 Commuted Sums The arrangements around the option to commute affordable housing requirements on a site by site basis are unclear. Carrying out site assessments and calculating the level of commuted payments will inevitably create a resource issue and will lead to some increased bureaucracy. Such issues are likely to be contentious and so the process of assessment must be both credible and robust. I would be concerned that such assessments and negotiations might delay developments further than they are already. It is not clear who will be carrying out that work, however, if the work is to fall upon a States Department then it needs careful thought, particularly at a time when our Departments are under pressure to cut costs Where will commuted payments go? Presumably they will be ring-fenced for 'affordable housing use' in the same way as we ring fenced any income from the bonds held against Jersey Homebuy properties. That could imply that the commuted sum payments should be added to the same pot and administered by the Housing Department and utilised to provide new affordable housing. That in itself is fine, provided that there is sufficient land available to create that new affordable housing. In the absence of available land in a developable state the outcome of developers making commuted payments would simply be a growing financial surplus with no means of utilising it whilst waiting lists for affordable housing continue to grow.		The Housing Minister's comments are noted.	Arrangements for commuted payments, and the level at which they are set will be included in supplementary planning guidance as stated in the draft Island Plan.	Noted by the Minister
DP859		Gerald Fletcher	Jersey Hospitality Association	Policy H 3	Affordable Housing	Objecting	Sites and buildings that are used for tourism-related purposes will also be exempt from the provisions of this policy.	The other damaging policy is Policy H3 requiring the provision of affordable housing from all residential development sites of two houses or more. Because, the tourism industry needs to be responsive to constantly changing circumstances it is essential that it is able to call on this funding when the market's expectations require it, otherwise the product will rapidly become out of date and, equally rapidly, become economically unviable. In relation to Policy H3, it is recommended that an exception be made in relation to sites that are used for tourism-related purposes, in order that the underlying land values that are critical to investment in the industry are not eroded. An addition would be made at the end of the Policy as follows, indicated in Bold text: Permission will not be granted for any development involving the provision of two or more housing units, whether or not this forms part	The comment is noted, but the policy is intended to operate across all sectors		The Minister is not prepared to recommend this change to Policy H3

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								<p>of a mixed-use scheme, unless and until the Minister for Planning and Environment is satisfied that the development has maximized the opportunity for the provision of affordable housing, in accord with the parameters of this policy. The Minister will require a proportion of 40% affordable housing to be provided on sites with the capacity of six or more housing units. Where this applies, affordable housing shall be provided on the site for which permission is sought unless one or more of the following circumstances apply: 1. that the provision of affordable housing on the site would make that development unviable; 2. that the site is of such a size or nature that the contribution to affordable housing would be maximized by allowing high-quality market housing to occupy that site and for the contribution to affordable housing to be in the form of a commuted payment, to support the delivery and/or procurement of affordable housing elsewhere; 3. affordable housing is best provided through the mechanism of a site-swap using sites within the ownership and control of the applicant; 4. the housing units provided in a mixed-use scheme are directly related to and necessary for the operation of that development. On sites with a capacity of two - five housing units, the Minister will require a proportion of 40% affordable housing to be provided through a commuted payment, to support the delivery and/or procurement of affordable housing elsewhere. Alternatively, the affordable housing provision may be made on the site for which permission is sought. The percentage of affordable housing shall be rounded up if the figure thus arrived at contains a proportion of one unit. The provision of housing to meet special requirements; registered lodging accommodation; and staff and key agricultural worker accommodation shall be exempt from the requirements of this policy. Sites and buildings that are used for tourism-related purposes will also be exempt from the provisions of this policy.</p>			
DP947		Mr James Godfrey	Royal Jersey Agricultural & Horticultural Society	Policy H 3	Affordable Housing	Neither	First time buyers: This issue is a complex one which is heavily influenced by factors other than planning and it is suggested that studies should be published on the record of first time buyer provision in Jersey before a 'predict & provide' solution is adopted. The principle of informed decision making should not be put aside when it comes to this issue, the notion that simply increasing supply will improve affordability does not necessarily apply.		The comments of the RJA&HS are noted.	It is intended that the establishment of the Affordable Housing Gateway will enable the quantum and mix of affordable housing to be established more accurately.	Noted by the Minister
DP583		Deputy			Housing	Neither	Ref para 6.118 Housing Mix - whilst very much a		Noted		Noted by the

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		John Le Fondre			Mix		personal view, provided there are good internal spatial standards, and good amenity space, should we distinguish between 3 bed houses and 3 bed flats ? Everyone would like a house with a garden in the countryside. That is not realistic and should not be identified as 'need' if land can be utilised in a more efficient manner.		and agreed		Minister
DP161		Mr Stephen de Gruchy		Policy H 4	Housing Mix	Supporting			Noted		Noted by the Minister
DP889		Bill Sarre	CBRE	Policy H 4	Housing Mix	Neither	One of the common areas of shortage is family homes whereas the general pressures on land suggests more use of apartments. To partially accommodate this, I have two proposals on housing types which maybe worth consideration: i) Within blocks of apartments, it maybe worth considering two storey duplexes at ground floor level which would act as quasi houses with ground floor gardens and first floor bedrooms. Additional apartments could be built above, but in terms of the mix of the scheme, more family accommodation would be provided. ii) Three bedroom flats are generally not popular with developers, but a provision of more of these would assist with families seeking a second bedroom for children. I would recommend that a provision of three bedroom apartment is general an area as close to facilities, but a blend within schemes could be considered.		Mr Sarre's comments are noted and supported		Noted by the Minister
DP13		Mr Howard		Policy H 5	Housing in Rural Centres	Objecting	I view this proposal with some disquiet - either the new Green Zone is protected by the Island Plan or it is not. The inference here is that local needs will be allowed to override the new protections. Parish "democracy" is at times somewhat tenuous and votes at Parish assemblies notoriously passed with a handful of attendees. Just because the Parish wants a development (probably on the cheap on the nearest handy piece of rough grazing) doesn't mean it should necessarily be allowed. This proposal seems to imply that the Planning Minister can abrogate his responsibilities to the Green Zone because the Parish wants a new development. The recent over 55 re-zoning was supposedly "parish-led" but was voted through by the whole States assembly. This proposal appears to remove that overriding protection and leaves an opportunity for a determined Parish and a compliant Planning Minister to drive a fairly large coach and horses through the new Green Zone protections. There is also the likelihood of creeping urbanisation into the Green Zone from pre-existing village developments which really should be resisted. I would require, at the very least, the whole States		Mr Howard's comments are noted	There is a need for housing development in the rural parishes, for young families and for the elderly, principally to maintain the schools, shops and services in the village centres. The Minister has offered to the Parishes the ability to be involved significantly in the preparation of local plans, but ultimately the responsibility will remain with the Minister to approve those plans.	Noted by the Minister

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							Assembly to vote this kind of proposal through on a case-by-case basis.				
DP162		Mr Stephen de Gruchy		Policy H 5	Housing in Rural Centres	Supporting			Support Noted		Support is noted by the Minister
DP23		Valerie Harding		Policy H 5	Housing in Rural Centres	Objecting	<p>The first paragraph (6.1) of the draft Housing plan states "The home is central to life, providing fundamental human need of shelter. In addition to meeting human desires for comfort, security, privacy, independence and personal identity". This statement can also be applied to existing residential developments particular security and privacy. Any additional large build in any part of the island negates these reasons. Paragraph 6.5 states " t he Plan needs to ensure that homes are provided in the right location to help achieve a more sustainable form and pattern of development in Jersey" . Brownfield sites are not necessarily the right location particularly those in the countryside in small villages such as Carrefour Selous. The words "pattern of development" sounds like a design for a patchwork. quilt. I cannot see how the building of up to 150+ units can "sustain the viability of rural parish communities (Housing objectives item 3). I also do not agree with Housing Indicators item 3 -Amount of new ressidential development in rural parish communities considered necessary to support viability and vitality"" . We live where we live as we like a quiet life. Such words smack of "New" Labour wanting to concrete over the south of England. Have parts of the plan been cribbed from elsewhere? However 6.122 seems to contradict the above re rural development as it states "There is recognition that there is a need to protect the viability and vita laity of Jersey's small rural settlements". Rural parish life is unique and important to those living there. More development will not protect rural parishes. The plan sets out the need for 4000 new housing units in the island over the next ten years. Firstly this figure is estimated and perhaps further information should be given to the public as to how this was reached. Who is going to live/buy 4000 units of housing? The figure makes no sense - Jersey is only 4S square miles. Paragraph 6.20 mentions fertility and morbidity (the latter means diseased; sickty - are we going to have a plague? Surely it should read mortality (frequency or number of deaths). Allowing for immigration of 150 per year that is only 1150 individuals over ten years and if each has a new housing unit then there is only a need for 1150 (the size of t he individuals family is irrelevant for the</p>		Reject	<p>The potential to allow small-scale development in support of some rural parish communities to ensure that the amenities and services provided in those parishes, such as the schools, remain viable, would be permitted under the auspices of this policy.</p>	<p>The Minister notes the comments made but is not minded to amend the draft Plan</p>

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							<p>purposes of estimating the number of units needed, the size of the family is relevant to the size of the unit i.e. two children three bed roomed unit etc) . This is partly covered in 6.21. 6.26 mentions 1000 households have housing aspirations. We all have housing aspirations but if you cannot afford it you do not buy it . People who have aspirations in life usual work hard and earn to achieve their aspirations or part thereof . The type of housing going to be developed are not mansions. Families living in States rented accommodation whose income is above the threshold would have moved by now if they were "aspired" to do so. They are probably happy living where they do. Social housing is usually built to an inferior quality and standard - another UK development idea - smaller rooms i.e. rabbit hutches. 6.91 says "information on the numbers of households who are in need of affordable housing is not clear" so why all the rush to build 4000 units over 10 years. 6.59 " ..Land is developed at more efficient and higher densities of development than previously achieved" . The words efficient and higher densities are a contradiction. If the States plan to use the UK density of development then all brownfield sites will eventually have 200+ units of housing which is far to dense anywhere in the island. This is " sink estate" size and could lead to social and neighbourhood problems in a few years. Nothing efficient in this type of build. The current maps of brownfield sites in the Island Plan show one field designated and numbered for initial development but other fields coloured in along side which implies larger development hence the figure of 200+ per site. The development at Goose Green Marsh (to which many Parishioners objected) has 102 units and is like a rabbit warren and a blot on the landscape and this is a private development not a States one. Have the following been taken into account: when reaching a 4000 figure:- local youngsters who attend university in the UK rarely return to live in the island so these should not be included in the estimate. Several people are currently living in the island that are working under a contract and in due course will leave Jersey. More people are living at home with their parents than at any time in the past 30 years. Many local younger couples live in France and commute to work in Jersey. Itinerant immigrants will not stay in the island and could not afford to buy anyway. Many Maderians have homes in their own island and will not be buying property in Jersey. There are a large number of empty properties unsold in the island perhaps the States should ensure these are sold/rented first</p>				

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							before developing further into the countryside. Restraint on non-residents being able to buy properties in Jersey as an investment . The mind-set that everyone should own their own home is purely a British concept . Thousands of Europeans live in rented flats . Major problems with waste disposal if large scale developments go ahead in the countryside . The only saving grace is that the re will be a five year check on development - hopefully.				
DP435		John Le Maistre	Jersey Farmers Union	Policy H 5	Housing in Rural Centres	Objecting	For the same reasons as our comments on "Proposal 14 - Parish Villages", we regard this as highly dangerous for the Industry. See attached letter		Reject	There has to be a balance between safeguarding agricultural land and providing for the needs of rural villages	Noted by the Minister
DP443		Mr Charles Alluto	The National Trust for Jersey	Policy H 5	Housing in Rural Centres	Neither	It is assumed within the draft plan that allowing small scale development on green field land could be justifiable as a means of helping to sustain Parish life. Before such a policy is adopted it is crucial that such assumptions are subject to rigorous examination and consultation. Jersey is an extremely small Island with a very fluid community and buoyant housing market. One therefore has to question whether the demise of rural parish communities is solely due to a lack of appropriate housing or rather reflective of a changing socio-economic structure.		Noted and supported		Noted and supported
DP45		Mr David Killip		Policy H 5	Housing in Rural Centres	Supporting	Further to discussions with Mr R Buchholz we support the proposed plan and in particular the proposal that our field No. 236 and the adjacent field No. 237 could be used for housing development if supported by the Parish of St John. David & Glenda Killip	Fields 236 & 237 are close to the village amenities with all mains services available. Development of these two very small fields would not detract from the surrounding area.	Note comment to support plan but reject inclusion of fields for housing.	The proposed sites do not comply with spatial strategy and does not meet with planning Minister's criteria for protecting green fields and open spaces. This includes the extension of the built-up area boundary, into the countryside, to allow for incremental development opportunities. There are, therefore, considered to be no grounds to identify other sources of supply to meet housing needs, including the release of additional greenfield land. Policy H5 (housing in rural areas) supports the provision of new housing as part of village plan proposals put forward by the constable and this is the policy where such housing sites may be considered in the future, provided they are required to support the vitality of the village.	Noted by the Minister
DP653		Conneta ble Silva Yates		Policy H 5	Housing in Rural Centres	Supporting		I write concerning the Draft Island Plan 2009 and confirm my support of this most important document. This plan will not only provide a basis for land-use planning decisions over the next ten years but will crucially set the direction for the	The Constable's comments are		Support is noted by the Minister

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								sustainable development of the island balancing social, environmental and economic considerations for the long term future beyond the year 2020. The question of social balance in the island is of paramount importance in this plan and I will be supporting in particular Policy H5 "Housing in Rural Centres" and Proposal 14 "Village Plans in order to sustain the viability and vitality of our Rural Communities. We must recognise and react to current trend where because of very high property prices in our rural settlements, our young people have to leave our community in order to find affordable accommodation. The Parish of St Martin is particularly vulnerable in this respect. You will no doubt recall that in July 2009 I circulated a study document entitled "St Martin Village Regeneration, Community Regeneration, 2010 and Beyond. This was very much a personal view of our progress within the 2002 Island Plan to date, with ideas and possibilities for consideration over a 30 year future time span. In November 2009 I presented a Parishioner Consultation Event where the study document was considered in conjunction with the recently released Draft Island Plan 2009. We had excellent parishioner participation and received over 150 written responses. See Attached letter from Dep J Reed - Minister for Education, Sport & Culture.	noted and supported		
DP695		Mr Andrew Fleet	Style Group Ltd	Policy H 5	Housing in Rural Centres	Objecting	In support of the objective of sustaining the viability of rural parish communities, new housing should be developed in suitable locations which offer a range of community facilities providing good access to jobs, key services and infrastructure. This should be achieved by making effective use of land, existing infrastructure and available public and private investment with the priority for development on all previously developed sites in particular vacant and derelict sites and buildings including employment and agricultural buildings. Additional housing must be identified now from the shortfall predicted on windfall sites to support the viability of the rural parish communities.		Reject	The Department is already working with parishes to identify additional housing sites as part of village plans.	The Minister is not minded to amend the draft Plan
DP834		Mrs Susan Kerley		Policy H 5	Housing in Rural Centres	Neither	I endorse the suggestions and comments made by the National Trust for Jersey on these policies and proposals		Noted		Noted by the Minister
DP946		Mr James Godfrey	Royal Jersey Agricultural & Horticultural	Policy H 5	Housing in Rural Centres	Objecting	Settlement plans: There should be no need for settlement plans as the principle should be not to develop new settlements and only develop existing ones within their current area. There are various 'red herrings' put forward to justify settlement development including supporting 'parish life'		Reject		Noted by the Minister

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			Society				although there is no evidence that it would or that somehow ' parish life' has remained unchanged to date.				
DP142		Mrs T Syvret			Housing Developm ent within the Built-up Area	Objecting	<p>The proposed re-zoning of the land at Samares Nursery is totally inappropriate to the stated objectives of providing Housing Trust and Social Rented accommodation as detailed within the draft plan. Given that the original Island plan stated the land as category H4 as a site to be "safeguarded for future development" - Together with a requirement for full public consultation, and a presumption against the development that will prevent the future use of the site for future housing development. I do not believe that consultation within the scope of a revised Island plan will give the detail of discussion that should be afforded to this site, and any consultation should be run as an independent topic. The Planning Minister has already turned down a proposed development on a H3 site on the original plan stating that the H2 sites should be exhausted first, and a further review undertaken at that point to assess any continuing need. Why then is an area of land originally zoned as H4 & in need of public consultation prior to any rezoning being considered over and above existing H2 and H3 sites? The land is sited within what is already a substantially built up area, with the high-rise flats of Le Marais, and surrounding lower rise flats, together with the redeveloped Le Squez estate. Placing additional Social Rented and Housing Trust properties in this area will only add strain to not only an inadequate drainage system, but cause significant over-density of what is likely to be tenants with children, who are likely to find insufficient entertainment within the immediate area. A survey of the issues encountered by the Police (Honorary & States) should be reviewed from when Le Squez was fully populated to give an idea of the issues large numbers of social rented properties in one area can bring. It would appear that access to the site is proposed through only one entrance and exit. La Grande Route de St Clement has insufficient capacity for rush hour traffic at the present time, with the road in a poor state of repair, a very narrow pavement, and poor drainage which results in any pedestrian being soaked by passing cars. The proposed entrance is actually on a slight bend in the road which would be of sufficient significance to produce a hazard to all road users, and insufficient for the volume of traffic that will be channelled through the route. The properties bordering the proposed site include bungalows, the privacy of the occupants of which would be severely</p>	See above	Objection noted	<p>The Plan highlighted a need for 1000 category A homes, the majority of which are planned to be developed within the existing built up areas. A small number of sites (7) were identified to provide around 200 family style Category A homes that could not easily be provided within the built up areas. These 7 sites were selected because they met with strict planning selection criteria including; that they fitted well within the existing built up area and met with the revised spatial strategy policies for the island, did not cause any significant visual or environmental harm, were near good transport network/bus routes/schools/shops and, where possible, were brownfield sites. This site met with all of these criteria and was also highlighted in the 2002 Island Plan as a future category A housing site. The removal of this site will reduce the supply of category A family homes and alternative sites will need to be found in order to ensure adequate overall supply of these types of homes on the Island is met. However, this site is not supported by the Parish of St. clement and the Minister for Planning & Environment has given an undertaking that any site not supported by the relevant Parish will be withdrawn from the draft Plan. Accordingly this site has been withdrawn and so the request to remove this site is therefore supported by the Minister.</p>	Minister minded to support request to remove site from Plan.

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							compromised if the development were permitted. Most properties in the row bordering the development are of single block construction, which could be at significant risk with the heavy machinery and depth of foundation required to build the proposed dwellings. St Clement is the smallest parish within Jersey, and yet, over the past few years appears to have borne the brunt of larger scale development. Should not the proposal of rezoning of land be proportionate to the size of the overall size of the parish? Has any survey been undertaken to assess the number of dwellings lying empty within the Island. The issue always seems to be one of providing "affordable" housing. Why then do properties stay empty rather than market forces being permitted to allow prices to fall to a level at which prospective buyers are both willing and able to pay. The press is continually running adverts for properties available within the Goose Green development and the Spectrum and Waterfront developments - Why? - They are too expensive for what they are! I therefore propose that the Samares Nursery site is at worst, set back as category H4 housing, and subject to full public consultation to rezone should the need arise once existing category H2 AND H3 sites be exhausted. However, given the housing density within the parish of St Clement, and the strain on the infrastructure of any further development, I propose that the site be returned to green field site to be used potentially as recreational space possibly as an extension to FB fields.				
DP163		Mr Stephen de Gruchy		Policy H 6	Housing Developm ent within the Built-up Area	Supporting					Noted by the Minister
DP164		Mr Stephen de Gruchy		Policy H 7	Housing to meet Special Requirem ents	Supporting					Noted by the Minister
DP165		Mr Stephen de Gruchy		Policy H 8	Registered Lodging Accommo dation	Supporting					Noted by the Minister
DP166		Mr Stephen de Gruchy		Policy H 9	Staff and Key Agricultur al Worker Accommo dation	Supporting					Noted by the Minister
DP429		John Le	Jersey	Policy H	Staff and	Supporting	We regard this Policy as positive for the Industry.	Our Industry does require on-farm			Support is noted

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		Maistre	Farmers Union	9	Key Agricultural Worker Accommodation			accommodation for our staff and we agree that permission for its provision should be allowed within the new Island Plan.			by the Minister
DP477		Mr Charles Alluto	The National Trust for Jersey	Policy H 9	Staff and Key Agricultural Worker Accommodation	Objecting	The Trust would like to express reservations regarding the policy for new dwellings in the countryside to house bona fide agriculturalists.	It is unclear as to how this policy will relate to hobby farmers and with further consolidation in the agricultural industry highly likely in the future, the Trust has yet to be convinced of the need for such dwellings. It is also crucial that the occupation restriction applies to those actively and currently involved in the industry, so as to avoid the system being potentially exploited upon the basis of early retirement.	Noted	The National Trust for Jersey's comments are noted. The restriction allows retired farmers to remain in occupation in their homes (usually owned by them).	The Minister notes the comments made but is not minded to amend the draft Plan
DP835		Mrs Susan Kerley		Policy H 9	Staff and Key Agricultural Worker Accommodation	Objecting	I endorse the suggestions and comments made by the National Trust for Jersey on these policies and proposals		Noted		The Minister notes the objection to this policy
DP896		Mr Iain Norris		Policy H 9	Staff and Key Agricultural Worker Accommodation	Objecting	Disagree that key agricultural workers should be housed in the Built-up area, these should be on the holding for management and social issues. In addition this would also tie in with Objective TT1 Travel and Transport Objectives: 1) to reduce the need to travel 2) to reduce pollution through travel and lead to improved farm efficiencies.		Policy H9 does not require agricultural workers to reside in the built-up areas, but qualifies the conditions that must be met before allowing such accommodation to be built in the countryside.		Noted by the Minister
DP938		Mr James Godfrey	Royal Jersey Agricultural & Horticultural Society	Policy H 9	Staff and Key Agricultural Worker Accommodation	Neither	Farm accommodation: There should be a differentiation between the need for accommodation for key staff, e.g. farm managers and permanent employees, as opposed to seasonal contract staff as one is making a full time home whilst the other is more itinerant in nature. This does not necessarily mean that quality is different, simply scale		The comments are noted	The issues raised in the comment are considered when a planning application is made for agricultural accommodation	Noted by the Minister

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							and is particularly acute on livestock farms where accommodation needs to be adjacent to the unit and retaining suitable key staff is challenging.				
DP167		Mr Stephen de Gruchy		Policy H 10	Conversion to Flats	Supporting					Noted by the Minister
DP478		Mr Charles Alluto	The National Trust for Jersey	Policy H 10	Conversion to Flats	Objecting	The Trust would request that where relevant this policy also accords with Policy HE1.		Accepted. Policy HE1 applies in all cases where relevant		Noted by the Minister
DP836		Mrs Susan Kerley		Policy H 10	Conversion to Flats	Objecting	I endorse the suggestions and comments made by the National Trust for Jersey on these policies and proposals		Noted		The Minister notes the objection to this policy
DP168		Mr Stephen de Gruchy		Policy H 11	Loss of Housing Units	Supporting					Noted by the Minister