

STATES OF JERSEY



SUPPLY OF HOUSING (S.R.5/2015): JOINT RESPONSE OF THE MINISTER FOR HOUSING AND THE MINISTER FOR PLANNING AND ENVIRONMENT

**Presented to the States on 27th October 2015
by the Minister for Housing**

STATES GREFFE

**Supply of housing (S.R.5/2015): joint response of the Minister for Housing and
the Minister for Planning and Environment**

Ministerial Response to:	S.R.5/2015
Review title:	Supply of housing
Scrutiny Panel:	Environment, Housing and Technical Services

INTRODUCTION

The Ministers for Housing and Planning and Environment welcome the Report of the Environment, Housing and Technical Services Scrutiny Panel (the “EHTS Panel”) on housing supply, and generally support their recommendations.

The Ministers have a close working relationship on housing matters, working with other Ministers on the Strategic Housing Group, and consider it helpful to make a joint response to these findings to reflect their close and joint working on these challenging issues.

The publication of this report is timely, as the Strategic Housing Unit has recently formulated and published a cohesive strategy for housing in Jersey, and is grateful for the support given to their work from the EHTS Panel. It is also noted that both the strategy and the EHTS Panel’s Report recognise that housing is a multi-faceted issue which impacts upon social, economic and environmental factors. This complexity highlights that there is never going to be a “*silver bullet*” or “*one size fits all*” policy that will bring about the delivery of housing.

The recommendations in the EHTS Panel’s Report therefore generally align with the thinking of the Ministers, as realised in the Housing Strategy, which focus on 4 main themes – delivering housing **supply, efficient use of resources, improved standards, and better neighbourhoods**. This last objective, focused on better community engagement, is an area which has perhaps not been focussed on in the past, and is not specifically highlighted in the EHTS Panel’s Report.

The role of community engagement in the delivery of housing is important – ensuring the views of the “*silent majority*” are heard, including people who need better housing. The Island Plan is the strategic document that sets out the vision for housing delivery for the next 10 years up to 2020 and it has been subject to extensive scrutiny, review and approval by the States. There can, however, be a public disconnect between this well-evidenced strategy document and the actual delivery of new housing supply. The recent case of the La Collette low-rise development proposal is a case in point. To address this, there perhaps needs to be more localised engagement to promote the benefits that that new housing can bring, including support for local services such as schools, public transport, shops and post offices, as part of a vibrant and inclusive neighbourhood.

**Deputy A.E. Pryke of Trinity, Minister for Housing
Deputy S.G. Luce of St. Martin, Minister for Planning and Environment**

FINDINGS

No.	Findings	Comments
1	The Strategic Housing Unit's commitment to producing an annual Strategic Housing Market Assessment Report is welcomed. Consistent and effective monitoring of housing supply and demand is essential for identifying shortfalls in delivery and planning correctly for the future.	Agreed.
2	At present, there is a significant leakage of the housing component of Income Support into the private rented sector. Currently, it is hard to measure how much of this rent is subsequently reinvested back into the current or future housing stock.	Noted. The forthcoming rental standards legislation will ensure that private rental housing is of an acceptable minimum standard, which will ensure investment is provided, where appropriate. The Housing Strategy will also reflect on the role of the social housing sector, promoting and enhancing the sector as source of high quality, secure housing.
3	The Affordable Housing Gateway does not reflect the true extent of the affordable housing need in Jersey.	The eligibility criteria of the housing gateway are restricted to those in most need, and given the availability of supply, widening these criteria would increase the waiting list and offer false hope to those in less need. Delivering housing supply and supporting the efficient use of resources is one of the objectives of the Housing Strategy, and by doing this, and then there may be an opportunity to widen the gateway criteria.
4	It is imperative that consideration is given to the type of property that is being sought by individuals on the Affordable Housing Gateway when planning for future supply.	Agreed. The evidence of the housing gateway was used in formulating the tenure breakdown for the rezoned affordable housing sites, and will be used as the primary evidence base for future needs on other sites.
5	A system, equivalent to the Choice Based Lettings System that exists in the UK, would allow individuals on the Affordable Housing Gateway in Jersey to make their own decisions about where they live and to exercise an element of choice. It would also provide a more effective way of utilising the limited housing stock available.	The choice based lettings system has already been employed by Andium in 2 trials which proved successful. Andium are currently upgrading their CRM systems, and a Choice Based Lettings module is included, which will allow for a more efficient process to be used in the future allocation process.
6	One of the biggest problems we currently face in Jersey is the volatile completion rates of new builds.	This is a reflection of a number of factors which need to be understood in more detail, although the current market conditions will always be a significant factor. The Island

No.	Findings	Comments
		Plan is a 10 year plan and the annual housing supply report will provide a good snapshot of our progress – at the same time, the period of time build rates need to be at an acceptable level that meets the expected demand over the life of the plan.
7	It is unlikely that the Summerland and Ambulance sites will be ready for development until 2023. Consequently, 150 affordable homes will not be delivered in the anticipated timeframe that was set out in the Island Plan.	Recent discussions have taken place which offer a reasonable prospect of seeing Summerland developed prior to 2020, but more work needs to be done before this can be definitively confirmed.
8	There are currently no funds earmarked for development of the Summerland site and Ambulance site.	See above.
9	The Council of Ministers has not provided Andium Homes with a population figure to work to in order to assist in the forward planning of the future supply of affordable homes.	The population target of 325 persons (150 households) is used as the basis for assessing demand, which has been published and approved by the States Assembly and is the basis for provision in the Island Plan. There is a legitimate issue in that net migration is higher than 325 – in the immediate term this is more of a concern for the overall housing market than for social housing, which has a 10 year qualification requirement – and this will be considered further alongside the Housing Supply Report.
10	Due to the delay in commencing development on former States sites and the rezoned sites, there is a strong possibility that the Island Plan target to deliver 1,000 affordable homes by 2020 will not be met.	There is no current evidence that the target of developing 1,000 affordable homes by 2020 will not be met. We need to await the Housing Supply Report, following which, conclusions can be drawn and any solutions required developed.
11	In order to facilitate the further delivery of much-needed social housing, it is imperative that the role of Housing Trusts is understood and supported by the Minister for Housing, the Council of Ministers and the Strategic Housing Unit.	Agreed. The SHU and Minister for Housing have a very close and effective working relationship with the affordable housing providers, working closely with them, and their role is clearly understood and highly valued, supporting the overall strategic priorities of the Council of Ministers. The SHU and Minister for Housing in particular are working closely with the trusts on the provision of new housing, ensuring that each trust has active development in the pipeline.

No.	Findings	Comments
12	A reduction in Jersey's property vacancy rate by 2% would bring 900 homes back into the market. This would count for over 2 years' target for supply through development in the Island Plan.	In 2011 there were 3,103 vacant homes, being 7% of all homes. A 2% reduction in this to 5% would provide 900 extra homes. However, many homes are vacant for legitimate reason; for example, 900 are between tenants; 700 are second or holiday homes; 550 are being built or renovated. The Housing Strategy commits to undertake a review of policy options to reduce the levels of vacant homes, but it is important to recognise that many homes are vacant for legitimate reasons, and that a reduction from 3,100 to 2,200, as suggested, is a very significant one.
13	The Island Plan policy requirements for an 80:20 tenure split on rezoned sites may have an adverse effect of discouraging landowners and developers from supplying any form of housing on the land.	It is anticipated that the sites will be delivered in the prescribed format in Policy H1 of the Island Plan as approved by the States of Jersey. These policies are designed to ensure that sites are viable – with the value of the 20% for affordable sale (based on supporting people with at or average earnings into home ownership) and the 80% for social rent (based on rents pegged to 90% of market rent) comparable and sufficient to ensure that profits can be made by landowners, without those profits being so high as to make the homes on these sites unaffordable.
14	Current planning policies conflict with the objectives underpinning the regeneration of St. Helier and act as a barrier to new urban housing projects.	There is no evidence to suggest that this is the case; recent experience has shown that a number of commercial and historical buildings are coming forward for residential development in the town of St. Helier.
15	Policy H3 could undermine the delivery of affordable homes if it is too onerous. In order for it to be a workable policy, it must be applied in a sensitive and pragmatic manner.	Policy H3 is not an active policy and is under review. Any revised policy will need to be applied sensitively and pragmatically, ensuring that sites are viable for development.
16	There is not a 'one size fits all' solution to the current problems we are facing with 'land hoarding'.	Agreed, as stated in Finding 6 on the new build rates, there are a number of factors at play which will need to be understood before any possible solutions are considered.

No.	Findings	Comments
17	The current planning policies that set requirements for parking spaces, density levels and Lifelong Homes standards may hamper the delivery of affordable housing.	The revised standards are under review and are to be published for consultation in the near future. These standards will need to be in line with the current strategic policies of the Island Plan, which seek to encourage and support development in the existing built-up areas. It is not anticipated that they will hamper the delivery of affordable housing.
18	It is unclear what impact the new 90% market rental policy will have on new and existing tenants and the overall rental housing market.	The 90% market rental policy was a decision of the Assembly to support the delivery of affordable housing, and bring existing stock up to a proper standard of repair and maintenance. Any tenants on income support will be supported to pay this level, where it is in place, and for those households there will be very little impact. The overall impact of the 90% rental policy may need to be reviewed as part of a general housing assessment with the Economics and Statistics Units.
19	Without the ability of ensuring that affordable homes are maintained as affordable in perpetuity, we are unable to secure these homes for future generations of first-time buyers.	Changes are being made to enable affordable homes to remain as affordable in perpetuity.
20	The Panel has been advised that the Minister for Housing is actively reviewing the possible re-introduction of the deposit loan scheme.	A range of assistive home ownership policies are being considered, including the deposit loan scheme, but this scheme will require funding to be made available.
21	Currently there is very little housing available locally for purchase on a discounted price, shared equity or shared ownership basis. This makes it particularly difficult for people who do not qualify for affordable housing via the Gateway and would like to buy, rather than rent privately.	Shared equity schemes are a form of ownership that will be available with the proposed reform of/amendments to the Loi (1880) sur la Propriété Foncière, which will allow hypothecs on the percentage value of a property. The Housing Strategy is clear in outlining that necessary affordable housing products need to be developed.
22	It is important that consideration is given to a wide range of schemes that will support individuals who are trying to gain access onto the property ladder.	This is supported by the housing strategy, which recognises the need to provide a range of choices along the 'housing continuum', from households accessing the highly-subsidised affordable sector, through intermediate housing, and finally to those who can fully access the open market with little subsidy or assistance.

No.	Findings	Comments
23	Extending the Affordable Housing Gateway to Key Workers in order to enable access to affordable housing is considered a positive step forward.	The Housing Strategy recognises the need to develop a policy for key workers, and using the gateway is one of the ways in which this cohort may be supported.
24	An individual's ability to successfully access the property ladder can be significantly affected by the number of participating mortgage lenders on the Island and the available interest rates.	It is recognised that the number of mortgage products available to local households compared to those in the U.K. is lower, but there is no material evidence that access to mortgage finance is more of a barrier to accessing home ownership than elsewhere. It is, however, a legitimate line of investigation. At the same time, enabling people to borrow more is not a means of making housing more affordable, and the focus therefore should be on the costs of finance.
25	Private rental landlords could make a meaningful contribution in providing affordable and secure homes to Jersey residents and assist in reducing the substantial Affordable Housing Gateway waiting list.	Agreed. It is intended to improve the standards of the rental market in Jersey, with lots of work underway around improving standards and regulation, and this may lead to some exemplar landlords being able to reduce the gateway waiting list.
26	The Housing Strategy Framework is a useful step forward in setting an agenda and a vision for housing.	Agreed. It will be a key document in addressing many of the issues highlighted in the EHTS report.
27	The lack of manpower resources available to the Strategic Housing Unit may increase the risk of delays in delivering the Housing Strategy objectives.	The SHU are a small team, but take the lead and are supported by a wider group of Officers and other States Departments in delivering the Strategy.
28	In recent years, communication between key players within the housing industry has significantly reduced. It is therefore imperative that an open environment is created where concerns can be voiced and discussed and solutions to Jersey's current housing situation can be found.	The Ministers for Housing and Planning and Environment, together with the other members of the Strategic Housing Group, are actively engaged with all the key stakeholders to ensure that there is an open and productive working relationship to address the housing issues faced in Jersey, and will continue and expand this engagement.
29	The Delivery Plan does not provide enough detail to enable close monitoring of the Housing Strategy objectives.	The Housing Strategy is a draft document for consultation, and will be amended to ensure that sufficient detail is included to enable the proper monitoring of the objectives.

RECOMMENDATIONS

No.	Recommendations	To	Accept/ Reject	Comments	Target date of action/ completion
1	The Minister for Housing should undertake an annual review of the qualifying income level for access to the Affordable Housing Gateway to ensure the figure is aligned with current rental costs, property values and affordability criteria.	SHU	Accept	The review of the qualifying income levels for access to affordable housing through the gateway is underway. It is specifically identified as a deliverable in the draft Housing Strategy Framework document. It is expected that this first annual review will be completed by the end of 2015.	End 2015
2	The Minister for Housing should ensure that annual targets for the delivery of affordable housing reflect the needs and requirements of individuals on the Affordable Housing Gateway, in particular the size of properties requested.	SHU	Accept	This will be included in the annual supply report which is due to be published at the end of the 2015.	End 2015
3	The Minister for Housing should require a full trial of a choice-based system to be operated for advertising and re-letting vacancies in the affordable housing stock. This trial should involve the housing trusts as well as Andium Homes. It should take place before March 2016.	SHU	Accept	A trial has already taken place with Andium in June and July 2015 and this will be reviewed with consideration given to extending it to all affordable housing providers, where appropriate.	Completed
4	The Minister for Planning and Environment should ensure that robust figures for housing starts and completions are collected and reported to the States Assembly on an annual basis to ensure transparency and accountability.	DoE	Accept	The Minister for Planning and Environment already publishes regular monitoring reports which include data on the number of homes completed and under construction ¹ . This data will also be included in the annual supply report which is due to be published at the end of 2015.	End 2015

¹ <http://www.gov.je/pages/search.aspx?Navigator1=GovJEType&Modifier1=%22%20c7%82%20c7%825265706f727473%22&query=housing+land+availability>

No.	Recommendations	To	Accept/ Reject	Comments	Target date of action/ completion
5	The Minister for Planning and Environment should work closely with the Minister for Treasury and Resources to identify additional finances which would enable Andium Homes to begin development of the Summerland and Ambulance sites as soon as they become available.	SHU	Accept	This work is underway.	Q1 2016
6	The Minister for Housing must ensure that all other Ministers who are involved in housing the population, as well as all affordable housing providers, are working to an up-to-date population figure. Furthermore, the estimated demand needs to be adjusted to take into account the number of people qualifying every year under the current 10 year rule.	SHU	Accept	<p>The SHU is overseen by a Ministerial group, including the Assistant Chief Minister (with responsibility for matters relating to population) in the Chief Minister's Department, the Minister for Treasury and Resources, the Minister for Health and Social Services, the Minister for Social Security, and the Minister for Planning and Environment.</p> <p>The SHU also works very closely with the Statistics Unit to ensure that policy directions are based upon the latest population projections.</p> <p>All statistical analysis of the population used to assess housing demand includes the adjustments to take account of the number of people qualifying every year under the 10 year rule.</p>	End 2015
7	The Minister for Planning and Environment should correspond with the Minister for Housing to bring forward a list of additional sites for new homes by December 2015, to ensure that the target for the delivery of 1,000 affordable homes by 2020 is achieved.	DoE	Neither accept nor reject	The need for new housing sites will be evidenced-based, driven by the outcome of the Strategic Housing Market Assessment Report, to be published at the end of 2015. Should this report identify a shortfall in housing having regard to projections over the remaining Plan period, consideration will need to be given to addressing this.	End 2015

No.	Recommendations	To	Accept/ Reject	Comments	Target date of action/ completion
				Any proposal to specifically allocate land for the development of affordable homes, over and above that already identified, would likely require a further review of the Island Plan.	
8	The Minister for Housing should clearly communicate the role she expects the housing trusts to play in the future delivery and management of affordable housing in Jersey, this clarification to be delivered by October 2015.	SHU	Accept	The Minister for Housing meets regularly with all of the housing providers and has a very positive and close working relationship with them. The Minister has clearly set out to them the role expected of them in the provision of affordable housing. For example, workshops have been established to discuss regulation of the affordable housing sector, and the Minister has viewed the housing provider's stock and provides clear direction and feedback to future development plans when they arise.	November 2015
9	By January 2016, the Minister for Housing should investigate the possibility of bringing empty homes back into use using a variety of tools including the introduction of a form of empty property tax or charging an annual sum in addition to the current parish rates.	SHU	Neither accept nor reject	The issues of vacant homes and how to bring more back into use within the property market will be addressed in a future policy paper to be published by the SHU. This paper will consider all of the potential options to address these issues, including that of using fiscal measures. However, it is not considered feasible that this can be achieved by January 2016. The draft Housing Strategy expects this work to be delivered by Q2 2016.	Q2 2016
10	By March 2016, the Minister for Planning and Environment should work with the Minister for Housing to review the impact of implementing the 80:20 rule	DoE	Neither accept nor reject	The 80:20 split is evidence-based and still relevant: it has been reviewed as part of the recent consultation on development briefs for each site. The impact of this policy will	End 2016

No.	Recommendations	To	Accept/ Reject	Comments	Target date of action/ completion
	for the delivery of affordable homes on re-zoned sites.			<p>not be realised until after these sites have been developed, which will be beyond the suggested review date of March 2016.</p> <p>The need and demand for different forms of housing tenure is an integral part of the annual supply report, the outcome of which will be factored in to future policy reviews.</p>	
11	The Minister for Planning and Environment should examine how current planning conditions could be relaxed in certain parts of St. Helier to encourage and facilitate new housing. This should result in the issuing of new supplementary planning guidance for St. Helier by March 2016.	DoE	Reject	<p>There are always 2 polarised views – on one side those who think the planning policy framework is too liberal; and on the other side those who think it is too constraining. These views were tested during the independent examination of the Island Plan which was subsequently approved and adopted by the States Assembly.</p> <p>The Minister for Planning and Environment is satisfied that the existing policy framework provided by the Island Plan can enable and encourage new housing in St. Helier.</p> <p>The Minister will continue to seek to encourage new residential development in St. Helier to help regenerate the town and to provide the homes that the Island needs, and will continue to develop area-based and site-specific guidance in support of this, as well as working with his Ministerial colleagues and the Connétable of St. Helier to make the parish a more desirable place in which to live, work and visit.</p>	N/A

No.	Recommendations	To	Accept/ Reject	Comments	Target date of action/ completion
12	The Minister for Planning and Environment should ensure that a meaningful dialogue with landowners and developers takes place before any planning obligations are applied to new builds. It is imperative that all parties work together to achieve the objectives set out in the Island Plan.	DoE	Accept	<p>A full review of the existing POA planning guidance is underway, and the Minister for Planning and Environment has identified the use of POAs as a key planning tool for delivering planning gain, where it is necessary and appropriate to do so. In particular, the Minister is working with his Ministerial colleagues and the Connétable of St. Helier to develop new guidance for the improvement of the Town of St. Helier which will help to identify where planning obligations might be required.</p> <p>In seeking to secure POAs in respect of development proposals, the Department of the Environment will engage with developers and landowners early in the development process in order to make this policy successful.</p>	End 2015
13	By March 2016, the Minister for Planning and Environment should work closely with the Minister for Housing and Minister for Treasury and Resources to review the initiatives proposed by our expert adviser and agree a set of incentives for encouraging the timely development of identified land.	DoE	Accept	<p>All 3 ministries have a very effective and established working relationship as members of the Strategic Housing Group, which will closely review all the recommendations in this report to make sure that the timely development of land can be realised.</p> <p>The Minister for Planning and Environment is undertaking a review of the planning applications process to consider those tools that might be available to encourage the more timely development of land.</p>	Q1 2016

No.	Recommendations	To	Accept/ Reject	Comments	Target date of action/ completion
14	By March 2016, the Minister for Planning and Environment should ensure that the current planning policies are 'fit for purpose' and do not conflict with the objectives of the Island Plan and, in particular, the provision of affordable housing in St. Helier.	DoE	Reject	<p>The policies in the Island Plan have been extensively reviewed, scrutinised and endorsed by independent planning inspectors as being sound and fully fit for purpose. Naturally, as part of the ongoing monitoring of these policies, the Minister may consider some changes to the plan, which will then be fully consulted upon, as prescribed by law.</p> <p>An interim review of the 2011 Island Plan, which focussed on the delivery of homes, was undertaken in 2014 and took 18 months from commencement to final adoption by the States. It is not currently expected that there will be the need to make any significant changes to the Plan until the next major review, which is scheduled for 2020.</p> <p>In the meantime, the Minister will be bringing forward new planning guidance on housing standards relating to internal and external space standards as well as car parking provision. Part of this work will include consultation and engagement with householders about the adequacy of current housing standards.</p> <p>These new standards will be subject to further engagement and consultation before adoption.</p>	N/a
15	The Minister for Housing should closely monitor the impact of the 90% market rental policy on tenants and report to the States Assembly by March 2016. The report should identify any	SHU	Neither accept nor reject	This is an important piece of work and will be undertaken in due course, subject to other actions identified in the delivery plan. The target date of reporting back to the States Assembly by March 2016 will therefore need	Q1 2016 (to be reviewed)

No.	Recommendations	To	Accept/ Reject	Comments	Target date of action/ completion
	unforeseen or unintended consequences of the affordable rent policy and should propose ways to overcome them.			to be considered, and the Minister for Housing will refer back to the EHTS Panel to confirm and agree a timeframe.	
16	The Minister for Housing must give priority to establishing a new legal framework for retaining properties in the affordable housing sector. The legal framework must be in place prior to the first house being sold, as stated in the 2014 review of the 2011 Island Plan.	SHU	Accept	This work is underway and is an identified action in the Housing Strategy.	Underway; to be in place prior to completion of developments
17	The Minister for Housing must ensure that the required changes to property legislation, to enable the introduction of a shared ownership scheme, are brought to the States for approval by the end of 2015.	SHU	Neither accept nor reject	This work is underway and is an identified action in the Housing Strategy. The matter was reconsidered by the Legal Advisory Panel on 23rd March 2015 and amendments are now being drafted to Security on Immoveable Property: reform /amendments of the Loi (1880) sur la Propriété Foncière, viz – (a) Hypothecs of jointly-owned property (b) Hypothecs secured on percentage of value of property (c) enlargement of prescription period for certain hypothecs. The timeframe for bringing it to the States by the end of 2015 is not thought to be achievable, with Q2 2016 more realistic.	Q2 2016
18	The Minister for Housing should amend action 1.2 of the Delivery Plan to include consideration of additional help to buy schemes such as funds of equity loans and mortgage guarantees.	SHU	Accept	This will be added to include consideration of other assisted purchase schemes, although it will need to be subject to availability of resources/financing.	End 2015

No.	Recommendations	To	Accept/ Reject	Comments	Target date of action/ completion
19	The Minister for Housing should commission research to identify what measures could be taken to increase the number of lenders active in the Jersey mortgage market.	SHU	Accept	A scoping paper will be prepared and circulated to the Strategic Housing Group (SHG).	Q1–2 2016
20	The Minister for Housing should ensure that the Housing Strategy addresses the benefits of allowing the private sector access to the Affordable Housing Gateway and identifies the steps necessary to enable this provision.	SHU	Accept	<p>This is a clear objective of the SHU and is supported in the housing strategy as a way of improving standards of private rental accommodation which can then assist in delivering more affordable housing to reduce waiting times on the housing gateway. The delivery mechanism will be made possible through the regulation of affordable housing providers, in which we will make provision to enable private and any third sector landlords to be accredited to rent accommodation to households on the gateway, subject to all appropriate standards and safeguards being in place. The necessary new legislation is due to be lodged by the end of 2015 and debated in early 2016.</p> <p>The accreditation of private landlords will then follow, subject to the more detailed development of criteria and approval from the SHG.</p>	Q2 2016
21	The Minister for Housing should closely monitor the Delivery Plan to ensure that the Housing Strategy objectives are being delivered according to the set timetable. If there are any delays in the commencement of work, consideration should be given to acquiring additional, temporary resources.	SHU	Accept	The action plan attached to the Housing Strategy has been realistic in both the timetable and available resources. Should priorities change or additional actions be identified, then this will trigger a review of the action plan, the Minister will be appraised and recommendations made, should there be an impact on the delivery plan.	Underway

No.	Recommendations	To	Accept/ Reject	Comments	Target date of action/ completion
	The Minister for Housing should establish a housing forum or working group, consisting of key stakeholders, by December 2015.	SHU	Neither accept nor reject	This will need to be considered by the SHG, but the principle of establishing a wider group or forum can be beneficial, provided it has a sufficient mandate and can operate effectively to contribute to the objectives in the housing strategy. There already exists a process for reviewing housing policy and initiatives through the engagement with key stakeholders, and this is a useful sounding-board that offers specialist advice on many of the key actions outlined in the strategy.	To be reviewed
22	The Minister for Housing should amend the Delivery Plan so it includes more specific and measurable targets that reflect the policy objectives of the Island Plan.	SHU	Accept	All of the Island Plan housing monitoring targets are replicated in the housing supply objectives of the housing strategy and so will naturally be included in the delivery plan.	by Q1 2016

CONCLUSION

The Ministers for Housing and Planning and Environment welcome the Environment, Housing and Technical Services Scrutiny Panel's Report on housing supply, and generally support their recommendations.

The EHTS Panel's case for ensuring that there is sufficient housing supply is welcome, and this message would be further enhanced if their final report emphasized the consequences, for current and future generations, of failing to build enough houses; and of the need to take the opportunities presented by the regeneration of land and buildings in St. Helier in particular.