From:	
То:	Policy Consultation
Cc:	;
Subject:	Captiva Homes response to Island Planning Strategy
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Attachments:	image001.jpg
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Captiva Homes is a leading, private residential developer on the Isle of Wight. We have over 20 years' experience of delivering homes on the Island and in the last 5 years have taken five mid to large scale (28 to 473 units) applications through the planning process – all ultimately receiving planning consent. We have a 100% track record of delivering all the projects we have gained planning consent for.

As a structural observation, and irrespective of the proposed changes to NPPF that are pending implementation by the new government, it is our belief that the current version of the Island Planning Strategy is unsound. Our Planning and Development Agent, BCM, has made separate representations (8<sup>th</sup> August 2024) on the IPS. We endorse those conclusions and raise concern about the themes and conclusions applied to the IPS, and in particular:

- 1. The Councils rationale for the ceiling to housing delivery (paragraphs 2.25-2.30 + the themes applied to Sections 6 and the 'G policies' and Section 7 and the 'H policies').
- 2. The viability of the Plan, as a whole, which is outdated and unrealistic.
- Several deferred considerations including the themes applied to SANG's, S.106 Contributions and/or infrastructure projects (which will be facilitated by development). It does not provide a stable baseline to calculate development costs.

We welcome progress of the Island Planning Strategy, albeit we have fundamental concerns that one of the greatest barriers to delivering housing on the Island is not directly recognised in this paper – that is stability for the development community. Stability, and clarity, have been lacking for the developers on the Island for nearly two decades. This has severely impacted housing delivery. In our case, we have the capacity, resources, and desire to deliver 150-200 homes per annum but have been unable to achieve this due to ongoing delays in realising planning consent – reasons for which extend beyond the remit of the LPA (see 3 reasons for delays below). Despite having engaged directly with the LPA, the Regeneration team (now disbanded) and Council officers / executive leadership, we have been unable to overcome these challenges and unblock the process. We identify three key reasons that have prevented delivery of housing on the Island:

## 1. Lack of land allocation

The 2012 Island Plan failed to allocate any land for development. The Area Action Plan's (AAP's), upon which it relied to do this, where never completed – despite guidance from the Inspector highlighting their importance. This has resulted in a significant decline in the level of investment and housing delivered vs the 2000's (which benefited from a clear land allocation in the 1996 Unitary Development Plan). As a company we have had to proceed at greater risk, cost and considerable time delay. From a wider industry lens this has created skills and employment gaps, lack of business continuity and instability in risk management and attracting positive investment. In part, this has been a core reason why housebuilding on the Island has declined.

## 2. Anti-development, 'NIMBY' Councillors

In recent years, a small but vocal group of anti-development Councillors have held disproportionate levels of influence at Planning Committee. They have actively campaigned against all major planning applications on the Island, consistently voted against Officer recommendations, arbitrarily attempted to recalibrate the Island's housing needs assessment to justify a number of <100 per annum and generally sought to establish an anti-development agenda within the Council and on the Island. Specifically, they have;

- Repeatedly blocked progress of the Draft Island Planning Strategy (since 2018)
- Led, supported and/or personally funded anti-development campaign groups
- Caused financial and reputational risk to the Council by maintaining positions on Planning Committee despite, in our opinion, clear pre-determination
- Actively supported, funded and coordinated Judicial Review proceedings against the Council
- Tactically sought to use TRO's to prevent delivery of consented schemes
- Ignored the recommendations of the recent independent peer review of Planning Services

   which noted that some Councillors behaviour had already caused reputational damage
  to the Council.

In one case, a member of the Planning Committee's voting record (100% voting against applications and Officer recommendations) became such an issue amongst his own party, he resigned. In another, the (then) Chair of the Planning Committee, reversed his own previously accepted position of pre-determination to insist on his right use his casting vote – on an application in his ward that he led a community campaign against.

These actions have undermined the credibility of the LPA, materially affected investment and slowed housing delivery on the Island.

3. Under resourced Local Planning Authority

This issue was clearly identified in the Peer Review of Planning Services and has been a significant barrier to the timely progression of planning applications. Issues extend beyond simple 'number of Planning Officers' and include ability to progress legal agreements (i.e S106 – which in our recent experience have taken over 12 months post resolution to grant consent) and complexity and uncertainty of interactions with Island Roads / Highways.

In addition to the issues identified above, we have concerns regarding the delivery of S106 Affordable Housing on Island. Recent experience has shown that no RP's are currently interested in bidding on, or taking, S106 affordable homes. Whilst this problem is not limited to the Island, the small number of RP's operating on the Island – and their current lack of appetite for new stock – is a real barrier to delivery of consented schemes and to the viability of future applications. The recent high interest rate is preventing inward investment into Affordable Housing stock.

Finally, we would seek further clarity in any future plan over the mechanisms for securing Develop Contributions. There is currently little evidence to support requests and no plan available to provide clarity on what is going to happen / or what costs are required - this has been significant

challenge in current and previous applications.

At Captiva Homes, we are committed to continuing to support the delivery of high quality, good value housing for Islanders and welcome the progression and implementation of an Island Planning Strategy that provides a clear and stable platform for housing delivery.



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Kind Regards,