

16 August 2024

IPS Representations

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Foreland Homes Island Plan Strategy (IPS) Regulation 19 Representations

Foreland Homes is a small Isle of Wight based developer builder. We currently build 10 residential dwellings per year and have a desire to increase in both size and delivery.

Foreland Homes is owned and operated by Justin Gentleman who has been developing new build residential schemes for 23 years on the Isle of Wight. Justin is highly experienced with planning policy, development economics and is actively involved with managing the build and delivery of his developments.

Justin's direct experience of taking these developments through the planning system, and the issues beyond in terms of actual delivery of residential development, make his comments directly relevant to this consultation.

This document is written by Justin and reflects his past and present experience of developing homes on the Island.

Background

The Island faces many issues, but its lack of an appropriate planning strategy document has led to a weakened supply of housing sites and created uncertainty about where is appropriate to develop, which has also damaged delivery of housing.

There has been a clear political approach to frustrate delivery of a planning strategy document, and clear attempts to limit housing provision within this document and false claims of special circumstances, in an attempt to plan for a lower number of homes.

These issues have prevented developers from having the confidence to invest on the Island. The Local Planning Authority (LPA) have found themselves at times, under extreme pressure from Local Councillors in relation to planning applications.

This has seriously affected the team within the LPA, delaying planning determinations and in some cases spanning those over several years. It has created a negative view of development, which causes many other issues and delays with determination.

Some of these issues were identified in the LGA Peer Review and have not yet been resolved.

## Review of Island Plan Strategy

The IPS is for a period of 15 years from 2022 to 2037. We are currently halfway through 2024, so this feels incorrect in approach. It also brings into question which of the housing sites within this document has already been delivered and what now remains? This is a document which should be forward-looking and ambitious, but the aforementioned approach does not gel with that.

## Demographics

There is clear mention of the Island's demographics and population statistics, but I cannot find mention of growth in households. This, of course, directly affects the number of homes an area needs; has this been considered?

I am also unclear what this document proposes in order to try and action issues such as 'brain drain' and meeting the needs of an ageing demographic. Furthermore, how does it aim to look forward to assist in changing the demographic to achieve more balance?

## Growth and housing

I disagree that the Island has a ceiling to delivery. When looking at housing completions, these need to take account of whole market cycle (recession to boom), and the figures at 2.25 do not do this. This is too short a window to measure what can be achieved and then claim the Island has a ceiling.

This strategy seeks to deliver housing at larger levels later in the plan cycle, which we know can be achieved as it was historically (above 700 dwellings PA) in 2006/07. We should instead be asking what factors enabled this level of homes to be delivered? I believe the lack of clear allocations of all sizes is the fundamental cause of lack of delivery.

2.30 looks at constraints, but it does not mention clear lack of allocations and supporting planning policy. This drives the confidence to invest, train, grow and reduces funding risks. This, in my opinion, is the largest single factor in terms of delivery. Furthermore, this single issue is within control of the LPA.

The Island has had no clear housing policy since the adoption of the Unitary Development Plan (1996-2011). This document had small and large allocations, providing clear approach and the confidence to invest. The lack since of such a document has had a drastic effect on the delivery of housing. The current 2012 plan promised housing via 'area action plans' which were never delivered.

Lack of certainly affects supply, and this is seen within the figures at 2.25 Figure 2.1. It is, however, noteworthy that if the Island had an up-to-date plan with both **small and large** allocations, it would take several years to increase the pace of delivery.

2.26 mentions lack of affordable housing provision. The failure of provision is a direct result of not having clear allocations. Almost all affordable housing in recent years has been provided via s.106 from larger sites. So, it goes hand in glove that without clear allocations driving stability, that will drive down the supply of affordable homes.

2.35 Brownfield land on the Island is not available in any quantity and the largest sites remain flawed. The Camp Hill land in Newport has not been disposed of by the prison service; is this even available for housing? Given the acute shortage of prison places, it is perhaps understandable it has not yet been offered to the market. It is, therefore, questionable if the former prison site should remain on the brownfield land register as a housing site. If the prison was expanded on this site, it would be a great employment expansion for the Island.

Of the 600 homes on brownfield land with permission, are any of these being built? What work has been done to understand if these are deliverable? Have any viability checks been made to understand these? I do not support G5 for reasons detailed below, but checks on these sites should be made. This is particularly important with larger sites such as the 500 consented homes at Medina Yard P/00496/16 – as fall-out or non-delivery of a site this large has seriously damaging problems for both the quantum of brownfield delivery and wider housing delivery.

*2.35 While there is a clear national and local preference to use brownfield land for development, and this is set out in policies in this document, some greenfield land is needed for development to help provide enough houses so that affordable housing issues can start to be addressed on the Island.*

The above is a sweeping understatement. It is, in fact, clear the Island needs and must develop greenfield land.

The land at Newport Harbour owned by the Isle of Wight Council requires very serious expense in terms of infrastructure before the very serious expense of the renewal of Quay walls, but base development economics do not work. For example, an 800ft<sup>2</sup> apartment would cost circa £190K to build, that is before:

- Communal access, corridors, stairs, lifts etc.
- Land
- Finance
- Warranty and service connections
- s.106 contributions
- Profit

I do not believe at the current time the same flat would achieve even the base build cost as a sales value. That is before even considering how long would it take to sell the volume of homes proposed, and the financial erosion on the land and profit (which do not exist) that would occur during the time it could take to sell these. Notwithstanding it is sited in a flood risk zone, which further compounds viability as flooding generally makes obtaining mortgages impossible.

2.36 & 2.37 make a good point, but where are the allocations to support delivery of aspirational homes? Do those aspirational homes fit within large scale allocations / large housing developments within existing towns?

Demographics section makes clear housing is needed for those migrating to the Island. *2.38 By reviewing its planning policies and position on housing, the council wishes to give the clearest possible direction to the prime focus of the local plan which is delivery of housing in the right places with the right level of infrastructure to best meet the Island's needs.*

The Island needs to plan for its demographic change and the growth in households, and that is meeting the Island needs.

2.46 Provides positivity and touches on changing working patterns since the pandemic, but I am not clear what this document does to encourage and further support and grow this.

3.21 states the IOWC does not want to be prescriptive on affordable housing tenure, but lack of clear and stable policy approach does not assist in providing confidence to invest.

Given the clear gravity of need, and huge undersupply of housing, I am not sure why 3.22, 3.23, 3.24 should carry weight. If this plan were to set out sufficient allocations, both small and large, why would this be a concern? It simply adds more uncertainty and ambiguity in terms of housing provision, which does not provide the confidence to invest.

3.25 Where are the allocations to support independent living?

If water and wastewater infrastructure is required, as mentioned in 3.37, it should not be necessary for the LPA to condition that via the planning process. These controls already exist in building control and, of course, the commercial sale or use of the property, so why does the LPA need to be involved?

3.39 feels rather backward. Surely if making allocations correctly (both small and large) infrastructure and highways plans could be formed by the LPA? Looking for joined up solutions from developers engaging with third parties does not provide the confidence to invest and will not aid delivery.

3.42 and the headings below do not feel forward looking and positive in approach. They feel like there is an underlying limit or ceiling being imposed. For example;

*Growth*

*IPS policies have to plan for sustainable development and growth – the Island population is increasing, and people are living longer, therefore growth is needed,*

**however** the additional homes, jobs, services and infrastructure that are required **have to be in the right places meaning people are closer to what they need;**

## Housing

*We need to build more houses on the Island for lots of reasons, **but mainly to try and make sure people are able to live in a home that is affordable to them.** IPS policies will enable different types of home to be built for the different needs of people. We want to make sure as many of the homes as possible are built in areas where people are able to access the services and facilities they need;*

**Bold is my emphasis.** But what is the undertone here? Considering the digital age and home working where are the right places, and what does 'being closer to what they need' actually mean?

We do have a serious need for affordable homes, but we also have a very serious need for all types of housing, so this focus feels wrong at this point of the document. Are we seeking a barrier to homes?

There remains a clear theme from page 32 onward of the desire to steer away from reliance on private transport. Why is this? Is this environmentally driven given the advent of electric vehicles? If this is to be policy that is championed, what does this document propose as a solution to transport?

3.45 I support that we should use land within the settlement boundary and brownfield first, but why should we prioritise the use of public sector land? This is not a document to drive revenue for public sector. It is a planning document, and we should surely prioritise the best available land for use?

3.46 given earlier comments within this document in relation to Camp Hill and Newport Harbour, 51% of homes allocated are on sites that contain brownfield land. What happens if these sites are not delivered?

3.48 projects 5,303 homes over 15 years (353.5pa) and makes no further allocation. Nationally, how many permissions lead to completions? And locally what follows as an acceptable fall out rate?

Supporting documents show 30% conversation rate i.e. the % of completions as a proportion of completions. See 3.2.4, page 10 within link below.

<https://iwc.iow.gov.uk/azservices/documents/2981-5-IWC-Assessment-of-supply-2020-Three-Dragons.pdf>

Given this fact if we continue with this plan, we should expect 105.9 completions PA.

Provision of SANG, Biodiversity net gain of 10% & protecting and providing green and open spaces. Whilst these are good policies that have potential to provide positive outcomes, they create a great burden on land available for development within an

allocation. Has the effect in land use terms and on yield of homes been considered with the allocated sites within this plan?

Water Quality Impact on the Solent Marine Sites – whilst I appreciate the national context of this policy, I fail to understand why this matter, which is a farming nitrate issue, falls to house building to resolve? Furthermore, simple policy on how we treat water could resolve this.

EV18 Improving resilience to coastal flooding and coastal risks

***Developer contributions from major development may also be required towards future coastal flood and erosion risk reduction schemes, in areas benefitting directly or indirectly from existing coastal defences or requiring future improvements in defences. Such contributions will be determined on a case by case basis using the Isle of Wight Shoreline Management Plan, coastal strategy and studies and any identified coastal defence projects to inform the particular areas and level of contribution. Pre-application discussions are encouraged and should ensure that such requirements are identified and considered at the earliest stages.***

This policy provides no confidence to invest. There is no structure and no clear calculation method, which indicates long and protracted negotiations. Contributions should be clearly defined, or they will preclude development.

C1 High quality design for new development

We live in a changing world, and I am constantly amazed by how a good quality design can make small spaces, or those limited by natural light, work incredibly successfully as we regularly see on many design focused television programmes. High density can also work very well within the right setting, such as Poundbury or, more locally, parts of old Yarmouth for example. Proving that such things can co-exist and be beautiful places to live.

We are pressured today by providing more housing effectively and things such density, small space design and those with limited light can provide great options to us. This policy as written precludes these entirely and, as such, I do not feel this is forward looking as this document should be.

Our high streets have permanently changed in recent years. Not helped by continued drive for parking charges within town centres. This approach has killed off what remained, leaving only those with time limited free parking zones as active and in use. Given this, and that this situation is worsening, any policy which seeks to protect shop frontages or limit signage needs considered very carefully.

5.4 makes clear the LPA wish to move away from larger scale housing development, but I cannot find any smaller scale allocations within this plan.

C4 - this policy again pushes the IOWC land, and this feels like an entirely incorrect approach.

C5 seeks 20% of major development for private sale built to meet part M4(2) which is positive. Has it been considered what effect this approach might have on allocations? For example, a proportion of single storey homes would be a great solution, but will have the effect of reducing density. Flatted or apartment based schemes would be successful, but these really need to be located within walking distance to shops and amenities to enable sale on the open market.

C6 is a positive step, but the following criteria causes a base problem.

*B the annexe would be occupied by dependent relatives of the occupants of the main dwelling, or their carer;*

How would this policy encourage a householder to build an annex (at large cost) which would have no use beyond that specified?

If we are prepared to accept the provision of an annex, then we should be prepared to make best use of it after its initial purpose becomes redundant. It could, for instance, become private rented accommodation or holiday accommodation if in the right location. We need both forms of accommodation and if it is not in a suitable location for holiday usage, then it will not be commercially successful so I would suggest it should revert to open market accommodation.

I do not feel it is necessary to have an internal link to the main dwelling from the annex, as there are many different forms of care. It should be for the users to decide if this benefits their needs or not. Given the huge issue surrounding care need and provision for the elderly, we should embrace anything that assist this.

C7 Delivering locality hubs feels rather vague. If this is particularly important, why it is not needed in other Island areas remains unclear. Is it simply to further IOWC land?

5.44 specifies delivery of these hubs via developer contributions, but there is no clarity on what these might be. It is also noteworthy that NHS budgets are allocated via block grant which provides population-adjusted funding. So, more population will provide greater local service level.

C9 Education provision – we are currently in a climate of falling rolls at entry level and face likely further amalgamation or closure of schools. Notwithstanding this could change in 15 years.

5.56 mentions developer contributions for post 16 education may be required. This is vague and unclear as to what might be required and where. This does not provide the confidence to invest. Notwithstanding the national tests.

C11 Net zero carbon and lowering energy consumption in new development – these are positive steps, but given the issues this strategy defines in terms of housing, should we be seeking to improve over national policy?

Does the LPA have the resource, upstanding and ability to enforce any policy above a national standard? If we are simply running with national standards, then these policies are controlled elsewhere.

Meeting the national policies we have in place at present, presents specifics in orientation and the need for roof space for PV that create design limitation and also limit density too. These should be considered with the land allocations and their yield.

C12 Utility infrastructure requirements for new development. This policy again mentions contributions from developers without any specifics. This does not provide the confidence to invest. Reading 5.82 to 5.87 below, I am unclear what is required that is not already covered by building regulations (specifically waste water), warranty or the ability to sell a completed development. Therefore, I am not sure why this is required or is a planning matter.

C15 Community led planning – why are we encouraging town and parish council to consider restricting second home or short-term holiday lets?

The Isle of Wight is a leading tourism destination, and second home and short-term holiday lets are critical within that tourism make up. Spend from tourism both direct and indirect is the lifeblood of many Island businesses.

The Island's dire old hotel stock found largely (but not exclusively) within the Bay area, is no longer desirable holiday accommodation and we must move with the times. Seeking to preclude holiday accommodation is not the answer to increasing housing stock.

The answer to increasing housing stock is to do just that. Community led planning is important, but too often in housing terms this is led by the privileged few with housing, that do not want to listen to the wider needs of society.

G1 Our approach towards sustainable development and growth – seeking to place the majority of development on public sector sites, without proper analysis of them is dangerous as previously outlined. Seeking to make clear that these are likely to deliver at the end of the plan is foolish and leaving our problems for future generations, rather than proactively solving them.

There is reference to delivery of windfall sites. Windfall policy prior to this strategy is likely to have used a great deal of these sites, without widening what can become a windfall site. However, this document seeks to tighten (G2) what can become a windfall site. It follows logic that if this approach is taken the windfall yield will fall.

6.8 is insular and not outward looking.

G2 Priority Locations for housing development and growth – This policy seeks to limit housing growth and precludes it entirely from those spaces not allocated or within the settlement boundaries. This fails as such to deliver what the Island needs and will



artificially limit housing delivery on the Island. In order to create a more balanced society and achieve greater sustainability to locations, all settlements should be expanded to some degree, no matter how large or small they are.

6.16 I am not clear how non-allocated sites can be delivered given the tightness of the policy this strategy sets out.

G4 Managing viability – this can only be done by a competent person who has direct and current experience of the market.

6.30 sets an extremely dangerous approach. In the last two years (2022 to 2024) build costs have risen by 15%. Any assessment data pre-pandemic is drastically outdated.

G5 Ensuring planning permissions are delivered. This damages the confidence to invest. Local IOWC studies have found that delivery of sites with consent follows a national picture which is acknowledged at 6.33. Therefore, this is not a local problem so seeking to add policy to a national issue will not assist. Lenders and financial institutions specifically will have issue with this policy, and it will result in developers choosing to invest elsewhere and lenders refusing to lend on the Island. The sensible approach would be allocating enough land to meet the Island's needs, taking account of the conversation of consents to completions ratio.

H1 Planning for housing delivery –

Of the allocated and consented sites within there is very little to provide opportunities to the smaller developer builders. Given the tightening of policy generally of this strategy, I cannot see the opportunity to bring new sites forward for delivery. I do not believe windfall sites can continue to deliver even 75% of previous capacity with restrictions to what is defined as windfall and H4, before also considering that we have already taken many opportunities forward that previously existed.

7.10 does not take account of changing policy, drastically restricting what is a windfall site.

Allocated sites for smaller developers –

This strategy does not support smaller developers and builders. There are nine development sites with 25 or fewer units proposed over a 15-year plan period. Although 2 are council owned and one has a IOWC strategy attached. The Island is predicated by smaller developer builders, and there are insufficient allocations for us. Smaller developer builders become the larger developers of the future, meaning it is vital that the strategy seeks to grow its development sector.

E8 Supporting high quality tourism – I am extremely disappointed to see the proposed continuation of policy to resist the loss of tourist accommodation within the Bay area. This restriction is outdated and damaging what should be a prime area for the Island. It is clear that this policy has failed when looking at the derelict properties trapped by the policy. They are of no benefit nor assistance to our tourism offer, and only seek to deter tourism; protecting them is abjectly foolish.

E9 Short term let holiday accommodation – makes up a vital part of our tourism offer. Shortage of accommodation in the private rental sector is the result of ill-judged political policies, which have changed taxation and increased legislation. Where these units are commercially successful, they are, in fact, fulfilling their role as part of the Island's tourism offer. These short-term holiday letting units will only survive in the long term in good quality, tourism appropriate locations.

The madness of this view can be seen when considering policy comments on E8 and E9 together. In this circumstance, would it not make sense to follow the changes of the market and seek to support short-term holiday accommodation where it works and seek to relax tourism policy where it fails?

We have a local housing need because we have insufficient housing, because we have failed, and we continue to fail to deliver enough housing. Restricting short-term holiday accommodation will affect our tourism visitors and their reducing spend will affect our economy.