

# Sequential Testing

**A Guide to carrying out Site Assessments and  
Sequential Testing of proposals in accordance with  
the Island Plan Core Strategy.**

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## Foreword

This guidance note aims to provide clarity for developer's, agents and architects and other interested parties on matters contained within the Island Plan Core Strategy.

The Core Strategy sets out the main locations where it is expected that the majority of development will occur in the next 15 years (Policy SP1).

Policy SP1 does allow for development to occur immediately adjacent to the current settlement boundaries. It also allows for development outside of these areas, but this is only when a specific local need is identified to justify development.

The Council is not prescriptive over what it considers 'local need' to be as it could include open market housing, affordable housing, work related development to support the rural economy, local community facilities, and tourism development identified through an appropriate needs study with the involvement of the local community.

This document covers guidance on assessment of sites, where planning applications for housing development are submitted. The Council does confirm, within Chapter 6 of the Core Strategy, that residential housing allocations will be made through the Area Action Plans (AAPs) of the Medina Valley, Ryde and The Bay and other areas will be considered within the Delivery and Management Development Plan Document (DPD). However, we recognise that in advance or after these documents are developed, there will be a need to consider housing related development proposals on unallocated sites. This will involve using a sequential approach which is summarised below.

## 1. The sequential testing methodology

In developing this sequential testing methodology we have taken an approach that we feel will assist in producing a consensus as to the right strategy for housing delivery in any given area and we hope that this will also provide an opportunity for putting in place a process that will enable key agencies and landowners to work together. In some instances sequential testing will be required on PDL and these are outlined within the tables below.

Sequential tests will be required in accordance with the following methodology:

		Is site within settlement boundary?	Is site immediately adjacent to settlement boundary?	Is the site PDL?	Does the proposal need to undergo a Sequential Test?
Key Regeneration Areas / Smaller Regeneration Areas	1-14 units	Y	N	Y	N
		Y	N	N	N
		N	Y	Y	N
		N	Y	N	N
		N	N	Y	N
		N	N	N	Y
	15+ units	Y	N	Y	N
		Y	N	N	Y
		N	Y	Y	N
		N	Y	N	Y
		N	N	Y	Y
		N	N	N	Y

		Is site within settlement boundary?	Is site immediately adjacent to settlement boundary?	Is the site PDL?	Does the proposal need to undergo a Sequential Test?
Rural Service Centres	1-9 units	Y	N	Y	N
		Y	N	N	N
		N	Y	Y	N
		N	Y	N	N
	10+ units	Y	N	Y	N
		Y	N	N	Y
		N	Y	Y	N
		N	Y	N	Y

		Does the site relate to a sustainable settlement?	Is the site PDL?	Does the proposal need to undergo a Sequential Test?	
Wider Rural Area	1-3 units	Y	Y	N	
		N	N	Y	
		Y	N	N	
		N	Y	N	
	4+ units	Y	Y	Y	N
		N	N	N	Y
		Y	N	Y	Y
		N	Y	N	N

## 2. What is covered by this guidance note

The Council has published a Local Development Scheme. This sets out when the AAPs and the DPD will be produced. A copy of the Local Development scheme can be found on [www.iwight.com](http://www.iwight.com)

The Council understands that it cannot prevent developers, landowners, agents and architects and interested parties from submitting applications in advance of the lower tier documents of the Island Plan being developed and therefore this guidance has been produced to provide technical guidance on the following issues relating to the sequential testing of sites to support the submission of planning applications:

- Evidence gathering and burden of proof
- Preference of sites (location)
- Sequential testing
- Enabling Development
- Local needs sites versus rural exception sites

### 2.1 Evidence gathering and burden of proof

The Council sets out the additional information that it considers is needed to develop the AAPs and the DPD within the core strategy (both within the specific policies that relate to the AAP areas and within the development management policies of the core strategy). It is important, that planning applications are therefore accompanied by sufficient evidence to support the requirements of the AAPs and DPD as this will demonstrate to the Council and to the local community that scheme being proposed is strategically in the most sustainable locations to help achieve part of the required housing units planned for that particular area over the plan period.

Development proposals, brought forward in advance of the AAPs and DPD will need to undertake a sequential test in accordance with the table in Section 1 and will therefore have to supply sufficient justification, including any technical reports as necessary, that all of the requirements of the AAPs and DPD had been considered in the process and that the site in question was the most sustainable location for development within the local area. The detail required in supporting evidence, will however be related to the scale of the scheme being proposed.

#### **Evidence gathering and burden of proof**

Any development proposals brought forward in advance of the AAPs or DPD will have to consider the requirements of those documents and adequately deal with them in a manner that will give confidence to the local community that the site in question is a sustainable location for development.

- The burden of proof will rest with the owner, agent or architect.

The Council will be pleased to provide any publicly available technical documents as they are produced,

## 2.2 How the Council will Allocate Housing Sites (Previously Developed land [pdl] versus non-pdl land)

When considering allocating land for residential development within the AAPs and DPD the Council will firstly prioritise the development of previously developed land where it is available, suitable and viable for the development proposed. This approach is clearly set out within Policy SP1 of the Core Strategy.

### *The sequential test required for Greenfield sites.*

Any large greenfield (non-pdl) site, as set out in Section 1, outside of or immediately adjacent to settlement boundaries will have to undertake an assessment of previously developed land (pdl) to ascertain:

1. Whether there are any pdl sites actively on the market within the local parish (a good source of this information is local land agents, for sale or let boards, or that the site has been submitted as part of the SHLAA process.)
2. If pdl land is available: whether the site is suitable for the land use intended (i.e. it may not be suitable to place residential units on a site that is adjacent to industrial premises)
3. If pdl land is available: whether the site is viable for the use intended. (The Council's preferred method of assessing development viability will be by using the Homes and Communities Agency (HCA) Development Appraisal Tool (DAT). The DAT is designed to appraise in detail the viability of an individual site we appreciate that you may wish to use another methodology of assessment. If this is the case, it would be useful if you could confirm the methodology that you intend to use.<sup>1</sup>

Once an assessment against pdl has been undertaken the same process needs to be applied to other greenfield (non-pdl) sites.

The Council can advise which sites have been submitted as part of the SHLAA process. In addition the Methodology and list of sites can be found at [www.iwight.com/shlaa](http://www.iwight.com/shlaa)

## 2.3 Planning Applications Submitted Before the Housing Allocations have been Publicly Identified in the Relevant Pre-Submission Draft DPD

Any large greenfield (non-pdl) site, as set out in Section 1, outside of or immediately adjacent to settlement boundaries that is submitted in advance of the appropriate AAP or DPD will have to provide evidence that sequentially they are more preferable for development (see process outlined in 2.2 above). In undertaking a sequential test the Council's guidance would be that any test should be proportionate to the level of requirements as set out within the AAP or DPD.

What this means in practise is that in the Core Strategy each AAP has a list of key issues that are set out in Chapter 6 of the Core Strategy.

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<sup>1</sup> (The DAT is freely available for use on the Homes and Communities Agency website [www.homesandcommunities.co.uk](http://www.homesandcommunities.co.uk). It should be prepared and used collaboratively between the Isle of Wight Council and developers to help establish the viability of development and thereby justifying the level of provision of the requirements of the Core Strategy and developer contributions obligations at an early stage in the planning process.)

Proposals brought forward will have to undertake the appropriate evidence assessment against any of these points that are relevant, at a sufficiently detailed level that would be needed by the Council if it was making housing allocations within the local area. Key to the sequential test process will be the location in which any sequential test is carried out.

The Council's advice is that within the AAP's, and in accordance with the relevant thresholds, a two stage approach needs to be undertaken.

1. Firstly, in consultation with the Council, an assessment of all of the PDL and comparable deliverable and developable SHLAA sites, within the settlement boundaries of the AAP boundary (as set out in section 2.2 above).
2. Secondly a sequential test of any PDL or SHLAA proposals within the local parish boundary at a more detailed level.

For Smaller Regeneration Areas (West Wight and Ventnor), Rural Service Centres and the Wider Rural Area, any proposal submitted in advance of the DPD should sequentially test all PDL and SHLAA sites within the parish where the proposal is situated.

The Council confirms that in advance of the AAPs and DPD an assessment of land values and development values has only been undertaken at a strategic level in order to provide background information for the development of the Island Plan Core Strategy.

In making land allocations within the AAPs and DPD the Council will be undertaking a further assessment, using the Homes and Communities Development Appraisal Toolkit (DAT), of the relative viability of each of the sites put forward as part of the SHLAA process. Until that work has been completed the Council will not be in a position to provide guidance on development viability constraints within a local area.

As such developers and their agents should ensure that proposals brought forward in advance of the AAPs or DPD provide all of the requirements of the Island Plan Core Strategy. If proposals differ from this approach then appropriate evidence must be submitted as part of the sequential test for all comparable sites.

## 2.4 The site

The Council considers that as part of the sequential test process as outlined in section 2.2 in order for a site to be considered as sequentially ‘more appropriate’ than others then evidence will need to be supplied that the scheme is deliverable. Appropriate evidence will need to be supplied in the form of an assessment confirming why the site is ‘more appropriate’ than other comparable sites.

The Council will require evidence to demonstrate that the application site is available, suitable and achievable. The additional information that will be required is elaborated upon within the supporting text to the policy and Table 5.1 within the Core Strategy (replicated below)

To be deliverable the site must be:	This is defined as:	Further IWC tests
<b>Available</b>	The site is available now.	<ul style="list-style-type: none"> <li>Confirmation and evidence from the relevant parties that a land deal is in place and that there is no ransom land that could prejudice the delivery of the site.</li> <li>That the site has undergone a full detailed economic viability assessment using the HCA economic viability toolkit or an appropriate approach/assessment as agreed with the Council.</li> </ul>
<b>Suitable</b>	The site offers a sustainable location for development now and would contribute to the creation of sustainable, mixed communities.	<ul style="list-style-type: none"> <li>That the site can meet the requirements of the Strategic Policies and Development Management Core Strategy (this information could be included in the Design and Access Statement, where required, and this type of information would generally be expected to be submitted in support of an application).</li> </ul>
<b>Achievable</b>	There is a reasonable prospect that housing will be delivered on the site within five years.	<ul style="list-style-type: none"> <li>Evidence to show that there are no major constraints to the deliverability such as lack of bank funding, or infrastructure funding.</li> <li>Evidence to show that the developer is ready and able to commence within the period specified after receiving planning permission.</li> </ul>

### ***Is the site available?***

The Council will require confirmation and evidence from the relevant parties that a land deal is in place and that there are no ownership constraints that could prejudice the delivery of the site. This information should already have been provided to demonstrate site ownership within the SHLAA proforma.

The Council may require that the site go through a full detailed economic viability assessment if such an assessment would demonstrate whether the site meets all the policy requirements of the Core Strategy and if not, what policy requirements can be met whilst maintaining the viability of the site.



### ***Is the site suitable?***

The Council acknowledges within the Core Strategy that in some instances it is likely that development would not be viable if they were to deliver all the policy requirements of the Core Strategy. This means that the Council will need to be flexible in its application of the requirements of the Core Strategy policies, to ensure delivery and that the broad objectives of the Core Strategy and indeed the Council are being met.

However, the starting point for discussions is that if a site is to be granted permission in advance of the allocation process it is expected it will deliver all the policy requirements of the Core Strategy. This will be demonstrated through general supporting information (such as within the Design and Access Statement, where required) and through the inclusion of such provisions within the completed Development Appraisal Toolkit for the proposed development site.

### ***Is the site achievable?***

If a site is to be granted permission in advance of the allocation process then we will require evidence to show that there are no major constraints to the deliverability such as lack of bank funding, or infrastructure funding.

In addition we will need evidence to show what mechanisms will be put in place to provide us with comfort that the site is ready and able to commence within the period specified after receiving planning permission.

As part of the detailed assessment of all the SHLAA sites and to help inform the allocation process for residential sites within the AAPs and DPD, the Council will be using the Homes and Communities Agency's Housing Quality Indicators (HQIs) to assess potential sites.

If development sites are seeking planning permission in advance of the allocation process of the AAPs, for consistency of consideration it would be useful if the same level of information is available. Therefore the Council would suggest that an HQI assessment (location element) of this site would be useful and a copy of this can be found at <http://www.homesandcommunities.co.uk/hqi>. If the site is submitted as part of the SHLAA process to be considered for allocation then the Council will undertake this exercise.

## **2.5 Enabling Development**

The Council recognises that sometimes development is needed to “enable” other forms of uses to become viable e.g. regeneration of larger employment sites; mixed use sites. The Council understands that in certain situations open market housing is needed to pay for associated infrastructure in order to make other developments commercially viable.

However the Council considers that the term “enabling development” should not be used if it relates to a scheme which only consists of housing development.

PPS3 confirms that in providing for affordable housing in rural communities, where opportunities for delivering affordable housing tend to be more limited, the aim should be to deliver high quality housing that contributes to the creation and maintenance of sustainable rural communities in market towns and villages.

Where viable and practical, Local Planning Authorities should consider allocating and releasing sites solely for affordable housing, including using a Rural Exception Site Policy. The statement goes on to say that rural exception sites should only be used for affordable housing in perpetuity.

Therefore on sites promoted as “rural exceptions” the Council would only consider schemes to support the provision of affordable housing. Open market housing used to support the delivery of infrastructure in this instance would not be supported as it does not accord to the broad principles of PPS3.

## 2.6 Local needs sites versus rural exception sites

The Council therefore considers that housing sites which are outside the Rural Service Centres and within the wider rural area should be promoted on the basis that:

- They are **only** delivering affordable housing to meet the needs of the local community – a rural exception scheme.
- Or any open market housing brought forward will meet the identified housing need of the local community – a local needs scheme.

The Council is publishing guidance on carrying out full market housing needs surveys which will include samples of questions that can be used to support any application that is brought forward.

The sequential testing of proposals for sites that are in the wider area and in a location which is not considered to be sustainable (remembering that some settlements that do not have defined settlement boundaries are still sustainable locations) or proposals for isolated dwellings in the countryside will need to link strongly with demonstrating local need.

### 3. Support Available

Isle of Wight Council, Planning Services is able to provide the following support to help you with your sequential testing:

- General advice on how to get started
- Advice on planning community and stakeholder engagement
- Advice with some of the technical, planning-related aspects
- Signposting to relevant contacts within other Council Services

Further technical information may already be available to help with site assessments on the [background information](#) page of the Planning Services website.

If you have any queries please contact:

[Planning.policy@iow.gov.uk](mailto:Planning.policy@iow.gov.uk)

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