

### **Site Sifting Process Addendum – July 2025**

- 1.1 This paper provides additional context for the consideration of the site sifting process, based on the discussions during the Examination Stage 1 Hearings.
- 1.2 The inspectors requested further detail and explanation on the sifting process that took the number of sites from the 678 set out in the HELAA Report 2021 (HELAA 01.01) to the figures as set out in Local Plan Site Selection Proforma Methodology Paper (2024) (LPSS 02.02).

#### **Site Sifting Process Overview**

- 1.3 A broad distinction can be made between those sites identified through the Call for Sites process – which provided the source for potential sites in the Green Belt and urban green field sites – and the Urban Capacity Study (UCS) for which the Council undertook a comprehensive and wide-ranging search for brownfield sites within the urban areas of the District.
- 1.4 Table A below summarises the site sifting process from the figures provided in the HELAA Report (2021) (HELAA 01.01) through to the Local Plan Site Selection - Proforma Methodology Paper (LPSS 02.02) and the site allocations set out in Reg 19 Local Plan Part B (LPCD 02.02).
- 1.5 The details of the second sift are set out separately in the tables below for HELAA Green Belt (Table B) and UCS sites (Table C).

**Table A – Site Sifting Process Summary**

	<b>Call for Sites (Green Belt and urban green field)</b>	<b>Urban Capacity Study (UCS)</b>	<b>Total</b>
Total initial sites	384	294	678
Sites which did not pass the HELAA stage	-33	-79	-112
<b>Net total after first sift (2021)</b>	<b>351</b>	<b>215</b>	<b>566</b>
Total removed in second sift	-192	-154	-346
<b>Net total after second sift</b>	<b>159</b>	<b>61</b>	<b>220</b>
Sites removed or rejected pre-Reg-19 with a Proforma	-114	-3	-117
<b>Sites allocated through Reg 19 draft Local Plan</b>	<b>45</b>	<b>58</b>	<b>103</b>

### **HELAA Green Belt Sites**

- 1.6 The site selection approach to sites in the Green Belt are explained in the following documents: HELAA Report 2021 (HELAA 01.01), the Site Selection Proforma Methodology Paper (2024) (LPSS 02.02) and MIQs Matter 2, Issue 5 Site Selection Methodology.

**Table B Green Belt Site Sifting**

	<b>Call for Sites (Green Belt and urban green field)</b>
Total initial sites (HELAA Report 2021 - HELAA 01.01)	384
Sites which did not pass the HELAA stage (Appendix 1 Table 1)	-33
<b>Net total after first sift (2021)</b>	<b>351</b>
Sites rejected due to location outside Green Belt buffer (not assessed at Proforma stage) (Appendix 1 Table 2)	-85
Site submissions superseded (not assessed at Proforma stage) (Appendix 1 Table 3)	-63
2021 sites submissions superseded (not assessed at Proforma stage) (Appendix 1 Table 4)	-21
Railfreight / Country Park (not assessed at Proforma stage) (Appendix 1 Table 5)	-14
Ariston Works (not assessed at Proforma stage) (Appendix 1 Table 6)	-1
Sites assessed, allocated at Reg 18 stage but not progressed to Reg 19 due to build-out or withdrawn by landowner (Appendix 1 Table 7)	-8
<b>Total Sites Removed in Second Sift</b>	<b>-192</b>
<b>Net total after Second Sift</b>	<b>159</b>
Sites Assessed and rejected through site selection Proformas (Appendix 1 Table 8)	-109
Removed due to proposed National Landscape Designation or lack of suitable access (Appendix 1 Table 9)	-5
<b>Sites allocated through Reg 19 draft Local Plan</b>	<b>45</b>

### **Urban Capacity Study**

- 1.7 The approach of the UCS differed to that of the Green Belt sites in the HELAA in that the search for sites took place over a number of years. While the largest number of sites were identified in the initial search in 2021, due to the 'no stone unturned' approach and desire to find as many brownfield urban sites as possible, the Council continued to search for and accept sites of this type right up to and

including the Regulation 18 consultation held in 2023. This means that there has been a more complex process with sites being added and rejected over a period of several years.

- 1.8 The detailed site sifting process for the UCS is set out below with the site details provided in Appendix 2.

Table C Urban Capacity Study Site Sifting

	<b>Urban Capacity Study (UCS)</b>
Sites assessed in the UCS 2021 (Appendix 1 Table 1)	294
Sites which did not pass the environmental and land use constraints in the UCS 2021 (Appendix 1 Table 2)	-79
<b>Net total after first sift (2021)</b>	<b>215</b>
Adjustment 4 sites additional not included in original 2021 report *	4
Adjustment -1 less site not included in original 2021 report *	-1
<b>Adjusted total after first sift</b>	<b>218</b>
Sites unsuitable due to insufficient site capacity (less than 5 units) (Appendix 2 Table 3)	-88
Sites identified pre-Reg 18 as urban sites from the HELAA (Appendix 2 Table 4)	2
Sites identified pre-Reg 18 sourced from the historic SHLAA (2009 - 2016) or Brownfield Land Register (2021) (Appendix 2 Table 5)	17
Further sites identified pre-Reg 18 by the Council (Appendix 2 Table 6)	7
Sites unsuitable due to environmental and land use constraints (following further review pre-Reg 18) (Appendix 2 Table 7)	-14
Sites not taken forward pre-Reg 18 due to lack of landowner interest or already on the Housing Trajectory (Appendix 2 Table 8)	-77
Additional sites submitted by the landowner/ developer at Reg 18 (Appendix 2 Table 9)	4
Site identified pre-Reg 19 (Appendix 2 Table 10)	1
Sites not taken forward prior to Regulation 19 due to lack of landowner interest, or site being unavailable (Appendix 2 Table 11) – no Proforma	-9
<b>Total Sites Removed in Second Sift</b>	<b>-157</b>

<b>Total after second sift</b>	<b>61</b>
Sites not taken forward prior to Regulation 19 due to lack of landowner interest, or site being unavailable (Appendix 2 Table 11) – with a Proforma	-3
<b>Total at Reg 19</b>	<b>58</b>

\* The 2021 UCS report was a draft and these small calculation issues were subsequently identified.

## **Conclusion**

- 1.9 The Council sets out in this paper how the site allocations have progressed from the 678 total sites and initial sifting out of 112 sites to the 566 sites carried forward in the 2021 HELAA Report. The process then progressed through the second stage sifting of sites which removed a net 346 sites so that 220 sites were subject to the Proformas, with these being the final sifting stage which led to the site allocations set out in the Draft Local Plan Part B.
- 1.10 While the site assessment process has been complicated and carried out over several years, the process has been comprehensive, thorough and consistent.
- 1.11 The overall position is that the Council can demonstrate that it has taken an approach of 'leaving no stone unturned' in relation to the urban areas, and that every reasonable effort has been made to identify and assess all potential sites in the District.