

An AI(artificial intelligence) \* analysis of the transcript created at the session:  
Minutes from Matter: 6 Issue 1 & 2 Housing Allocations in the Main Urban & Regeneration Sites

### Meeting details

- **Event:** South Tyneside Local Plan – Stage 2 Hearings
- **Matter:** 6 – Housing Allocations in the Main Urban Area and Regeneration Sites
- **Issues covered:**
  - Issue 1 – Housing allocations in the main urban area (Policy SP4, SP5)
  - Issue 2 – Regeneration areas/sites including Brinkburn (SP5) and Chuter Ede (SP6)
- **Date & time:** Tuesday 13 January 2026, 10:00 (morning and afternoon sessions)
- **Location:** Hotel venue (with council Program Officer present on site)
- **Chair / Inspector:** David Spencer, Planning Inspector (Planning Inspectorate)
- **Program Officer:** Annette Fenny

### Attendees (as recorded for this session)

- **Inspector and examination team**
  - David Spencer – Planning Inspector
  - Annette Fenny – Programme Officer
- **South Tyneside Council**
  - Paul Shedervian – King’s Counsel, for the Council
  - Deborah Lamb – Operations Manager, Spatial Planning
  - Rachel Cooper – Senior Planning Policy Officer
  - Jeff Horseman – Team Manager, Development Management
  - Additional officers later in session on regeneration/heritage:
    - Lucy Reid – Historic Environment Officer
    - Matt Clifford – Senior Planning Policy Officer
- **Developers / agents and land interests**
  - Neil Westwick – representing Avant Homes
  - Dominic Warr – representing Bellway Homes
  - Neil Morton – Savills, representing Laverick Hall Farm Ltd
  - Kevin (LG Planning) – representing Story Homes Ltd
- **Councillors / community representatives**
  - Cllr Dave Herbert – Councillor, South Tyneside, Green Party
  - Cllr Taylor – Councillor (joined later in Chuter Ede item)
- **Other participants mentioned**
  - Representatives of Port of Tyne and other parties referred to in written statements and objections (not all spoke orally in this extract).

## 1. Opening and procedural matters

### 1.1 Inspector’s introduction

- Inspector confirmed his role as independent examiner appointed under s20 Planning and Compulsory Purchase Act 2004, and that he alone will make recommendations and any main modifications for soundness.
- Confirmed the examination is of the South Tyneside Local Plan (Reg 19 consultation early 2024, SoS intervention, submission March 2025).
- Re-stated that the hearings are recorded and recordings will be made publicly available.
- Confirmed process: structured, respectful discussion, with equal weight to written and oral representations.

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## 1.2 Applicable policy and wider context

- Inspector confirmed he is examining the plan against the **September 2023 NPPF**, despite publication of a new draft NPPF before Christmas; the draft is not the basis for soundness tests.
- Noted the legal **Duty to Co-operate** is no longer enforced, but he has previously concluded (post-Stage 1 letter) that the duty was met; in the final report it will likely be treated as soundness rather than legal compliance.
- Referred to an October 9 ministerial letter to the Chief Executive of the Inspectorate urging efficient progress of examinations where plans are capable of being made sound with modifications; Inspector's goal is to move quickly to conclusion and modifications if the plan is capable of being found sound.

## 1.3 Additional evidence accepted into examination

Inspector recorded acceptance of the following post-submission evidence:

- Council topic paper on **strategic playing field mitigation**.
- Council **housing trajectory** topic paper.
- Updated 2025 **SHLAA/SHLAA ("schlaar/schlar")** base date.
- **Legal opinion** submitted on behalf of Mr Robert Latimer (15 December) – Council to comment at water quality session.
- Office for Environmental Protection (OEP) final reports on investigations into Ofwat, Environment Agency and Defra – relevance to water quality to be explored later.

## 2. Overall approach to housing allocations in the main urban area (SP4)

### 2.1 Factual updates on SP4 allocations (consents and delivery)

- Council reported that between **Reg 19 consultation (Jan 2024)** and **end March 2025 (SHLAA base date)**, **six SP4 allocations** were granted planning permission; four further allocations have secured permission since March 2025.
- Additional consents include:
  - 124 apartments at SP6 (Chuter Ede extra-care scheme).
  - 7 dwellings at site H19 (Land at Trent Drive).
- Council stated that **consented capacities are generally very similar** to the indicative capacities in SP4, with the main difference being **South Tyneside College (H7)** where a larger site area was consented, yielding higher capacity than the plan indicative figure.
- Council relies on standard density methodology plus site-specific information (developer input, planning applications) to set **indicative capacities**; the similarity between estimated and consented figures is cited as evidence of reasonable accuracy.

### 2.2 Development industry concerns on capacity and BNG

- Development representatives reminded the Inspector that, at Stage 1, they raised concerns that **SP4 indicative capacities may be overestimated** once on-site open space, biodiversity net gain (BNG), and optional housing standards are factored in.
- Mr Westwick (Avant) noted that on SP4 sites which now have permission, the Council already had benefit of pending applications, so capacity alignment is unsurprising and not a reliable sample for the remaining constrained SP4 sites.
- Mr Eaton argued that most permissions referred to are pre-mandatory BNG, and that many remaining SP4 sites have greater constraints, so the current record is not a good predictor of deliverability or capacity on the rest of SP4.

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### 2.3 Council response on capacity methodology and BNG

- Council referred to **Action Point AP7** work, where a small sample of main urban area sites was re-tested and showed that even with **lower BNG requirements** in urban areas, indicative capacities can accommodate BNG and other policy requirements.
- Council maintained that the indicative SP4 capacities remain **reasonably robust** for plan-making, acknowledging they are indicative not fixed.
- Inspector noted the residual developer concerns but indicated he will reflect further, including whether capacity “headroom” on some sites could offset under-delivery on others.

### 3. Site-specific SP4 issues and key decisions/actions

#### 3.1 Site H7 – South Tyneside College (SP4)

##### Planning status and capacity change

- SP4 shows H7 at ~160 dwellings; planning permission (30 June 2025) has been granted for **260 dwellings**, supported by a signed s106, and therefore has an implementable permission.
- Avant Homes is **no longer bringing forward** the college site; Miller Homes have submitted a **new Section 73 application** (received 6 January) for a **revised scheme of 198 dwellings** on the same site, with larger house types.
- Council confirmed the S73 application is valid and under processing; the extant 260-unit permission remains in place.

##### Playing pitch / open space mitigation

- The increased site area for the 260-unit scheme includes land previously shown as open space on the policies map, triggering off-site playing field mitigation.
- Council described the s106 mitigation package:
  - **Harton and Westoe Miners’ Welfare/South Shields FC site:** new 3G pitch and new 9v9 grass football pitch, delivered by South Shields FC, with a 4-year delivery window from commencement of college-site housing.
  - **Epinay School (“Epinay”) site:** currently has unused playing fields; mitigation includes two cricket pitches, a junior rugby pitch and a new pavilion with changing and bar facilities, with delivery funded via contributions from the college and Harton & Westoe s106s; Council to deliver works, Westoe Cricket and Rugby Club to take a long lease and manage facilities. Works must be committed within 5 years of commencement of the college housing.

##### Inspector’s conclusions and proposed modification

- Inspector indicated he is minded to treat H7 as demonstrating **higher capacity than SP4**, and that additional capacity on this site could partly **offset potential shortfalls** on other SP4 sites constrained by BNG or other requirements.
- Inspector indicated a likely **main modification** to:
  - **Increase H7 indicative capacity to 260 dwellings** in SP4 (possibly as “up to 260”), while acknowledging a lower number might ultimately be built.
  - **Amend the policies map** to reflect the enlarged H7 site boundary consented under the 260-unit permission.
- Council **supported a modification** to reflect the higher capacity and map change.
- Mr Shedervian KC suggested that, if the 198-unit S73 is approved before modifications are finalised, the table could possibly show a range, but recognised Inspector’s reluctance to show ranges in a table of indicative figures.

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### Key actions – H7

- **Action 1 – Council:** Provide proposed main modification text to SP4 to change H7 indicative capacity to 260 dwellings, and update the policies map to cover the extended site area.
- **Action 2 – Council:** Ensure the **housing trajectory** is updated to use a higher H7 capacity (consistent with the extant permission) while acknowledging S73 potential; this has already been partly reflected in the latest trajectory.
- **Action 3 – Council:** Confirm in written material that mitigation for loss of college pitches (Harton & Westoe and Epinay sites) is funded and programmed in accordance with the s106 obligations (4-year and 5-year triggers).

### 3.2 De-allocating sites already under construction

- Council confirmed that **three SP4 sites are under construction** as of 1 April 2025 (per response to MIQ 6.2) and that it **supports their “de-allocation”** from SP4, on the basis that the principle of development is established and they are treated as commitments instead.
- Council wishes to **retain as allocations** those SP4 sites which had permission by April 2025 but where development had not yet started, so that the plan retains control if revised applications are submitted.

### Key actions – de-allocations

- **Action 4 – Council:** Identify the exact SP4 sites now under construction and draft main modifications to remove them from the allocation table and rely on them in the trajectory as commitments.
- **Action 5 – Council:** Clarify in the trajectory and supporting text which permitted but un-started sites are retained as allocations and why, ensuring consistency of approach.

### 3.3 Additional SHLAA capacity and new urban sites

- Inspector queried whether the 2025 SHLAA identified any **additional suitable sites within the main urban area** beyond those already in SP4.
- Council confirmed:
  - SHLAA accepts sites on a rolling basis.
  - No **additional suitable main urban sites** have been identified beyond extra capacity at South Tyneside College.

### Cllr Herbert’s submissions about town-centre opportunities

- Cllr Herbert argued that **town-centre car parks and other council-owned land in South Shields** could be redeveloped for higher-density housing above retained parking, citing practice in Newcastle, Gateshead, Sunderland and Homes England / North East Combined Authority funding for brownfield regeneration.
- He contended that the Council has not fully explored these options before using Green Belt, contrary to NPPF expectations and the plan’s brownfield-first strategy.

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### Council response

- Council stated it had worked “comprehensively” with asset management and regeneration teams to identify council-owned sites; several **town-centre car parks are already allocated** in SP4 (as per AP7 sites).
- Council emphasised the need to **retain some car parking** to support town-centre regeneration and the new South Tyneside College campus, which relies on existing town-centre car parks due to limited on-site parking.

### Developer view on SHLAA coverage

- Mr Eaton commented that he does not criticise the Council for failing to consider urban sites; in his view, the Council has “squeezed every pip” in main urban areas to avoid releasing more peripheral sites, though he believes some capacities are over-optimistic.

### Key actions – urban capacity

- **Action 6 – Council:** In any updated SHLAA/trajectory material, clearly document how council-owned town-centre car parks and other assets were assessed, including which are allocated and which are retained for town-centre functioning.
- **Action 7 – Council:** Consider whether the plan’s justification (and possibly supporting text) needs to more explicitly explain why certain car parks are retained and how that balances regeneration, parking and housing objectives.

### 3.4 Cleveland Lane Industrial Estate site (appeal site)

- Mr Westwick reminded the Inspector of the **Cleveland Lane industrial estate site** (former brownfield in the main urban area), previously in SP4 at Reg 18, now with an unresolved appeal and capable of 202 units.
- He suggested it should be treated as an **allocation rather than a commitment** in the plan, given the appeal decision is still awaited.

### Council position

- Council stated:
  - The site had a **resolution to grant permission** at plan drafting stage and is currently treated as a **commitment** in the SHLAA and trajectory.
  - For consistency with other sites, the Council **would not object** if the Inspector decided to show it as an **allocation in SP4** rather than just a commitment, subject to the appeal outcome.

### Inspector’s approach

- Inspector will revisit this at the **housing trajectory** session, noting that a site of this scale sitting in the trajectory as a “large windfall” is undesirable.
- He recorded that the Council is open in principle to re-introducing Cleveland Lane as an SP4 allocation, subject to the appeal decision.

### Key actions – Cleveland Lane

- **Action 8 – Council:** Prepare contingency main modification options for Cleveland Lane:
  - Option A – include in SP4 with indicative capacity, if consistent with appeal outcome.
  - Option B – retain as commitment but provide clear justification in the trajectory.

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### 3.5 Deliverability and market signals (Hawthorne Leslie and vacancy rates)

- Cllr Herbert cited the **Hawthorne Leslie shipyard brownfield site**, with indicative capacity of ~450 units, consented just after Reg 18 but not yet delivering housing, questioning why such a large brownfield scheme is not yet fully contributing to supply.
- Council replied that:
  - Hawthorne Leslie has significant ground contamination; buildings have been demolished and remediation undertaken.
  - A Section 73 application is live to amend Phase 1; site is “essentially ready for development”, and housing is expected to commence shortly.
- Cllr Herbert pointed to:
  - An increase in **vacant dwellings** from around 2.4% to 3% between Reg 18 and Reg 19.
  - An assumed **10% non-implementation rate** in the trajectory, arguing that these do not indicate a particularly strong housing market.
- Inspector noted he will examine the 10% allowance and overall windfall assumptions in detail at the **trajectory session (Thursday)** and took Cllr Herbert’s point as an invitation to apply caution to delivery assumptions.

### 3.6 Policy SP4 site H6 – Former St Aidan’s Church

- Site lies within the buffer zone of the Arbeia Roman Fort World Heritage Site. Historic England sought **additional wording** in SP4 due to heritage sensitivity.
- Council noted:
  - Multiple historic permissions; latest full permission (Dec 2023) for **14 apartments**, with Tyne & Wear Archaeology Service consulted.
  - Permission is subject to a **watching brief** archaeological condition; no objection from archaeological consultees.
  - Site is **profiled as deliverable within 5 years**.
- Inspector, having visited the site (surrounded by housing), accepted that the heritage issues are being managed through conditions.

#### Key actions – H6

- **Action 9 – Council:** Agree precise additional **heritage wording** with Historic England for SP4 key considerations for H6, reflecting its position within the WHS buffer and the watching-brief approach.

### 3.7 Policy SP4 site H8 – Land associated with Creamery, Edgumbe Road

#### Site characteristics and planning history

- Brownfield site within main urban area; current active commercial uses, surrounded by housing.
- Past planning permission for a high-density apartment scheme (now lapsed), involving tree loss and little private amenity space, granted at a time of high housing demand and pre-BNG.
- The Council’s current **allocation boundary** extends beyond the earlier application site to include an adjoining **amenity grass area to the south**.

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### Council justification

- Council stated:
  - The site is in a sustainable location with good access to services and sustainable transport.
  - Past permission establishes the **principle of housing**.
  - Sustainability appraisal identifies very positive effects on efficient land use and health, and positive effects on housing and sustainable transport.
  - The inclusion of the amenity grassland provides opportunity to secure good quality open space and BNG within the allocation.
  - Council has tried but failed to contact the landowner since the last SHLAA iteration; still considers the site developable beyond year 5.
- Council noted the existing commercial units are small-scale businesses that are **not protected as key employment land** elsewhere in the plan.

### Issues and concerns

- Local ward councillors' written representations raise concerns about:
  - Loss of existing commercial premises and impact on businesses.
  - Loss or reduction of local amenity space.
- Mr Eaton raised key questions:
  - Uncertainty over whether the alleged BNG/amenity land to the south is in the **same ownership** and actually available.
  - Tension between **amenity open space and BNG** uses on a small site.
  - Very long and unsuccessful planning history; no delivery despite previous consents; increased constraint and viability pressures (BNG, standards) since.
  - He questioned whether it is realistic to assume delivery even within the 15-year plan period and invited the Inspector to consider **removing H8 from SP4**.

### Council additional evidence

- Mr Horseman noted there is an active **planning enforcement case** on one of the site businesses, with complaints about "bad neighbour" impacts on adjacent housing and a question mark over whether that business is authorised, which might support rationalisation and redevelopment in the longer term.

### Inspector's position

- Inspector recognised the tension: small, constrained site with a poor delivery track-record, but also urban brownfield in a sustainable location with existing amenity issues.
- If H8 is retained, Inspector indicated he would seek a **main modification** to SP4 to:
  - Clarify that the southern amenity area within the boundary is intended to **remain or be enhanced as open space/BNG**, not fully built over.
  - Possibly record the Council's assumption that the amenity land is **Council-owned**, subject to confirmation.

### Key actions – H8

- **Action 10 – Council:** Confirm land ownership of the southern amenity area and provide evidence that it is available to form part of H8, including for open space/BNG purposes.
- **Action 11 – Council:** If H8 is retained, draft main modification wording for SP4 key considerations to state that the southern amenity area should largely be retained/enhanced as open space/BNG, and to note the need to manage bad-neighbour uses.

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- **Action 12 – Inspector (for later):** Decide at report stage whether evidence justifies **removing H8 from SP4** on deliverability grounds or whether modified wording suffices.

#### **4. Regeneration sites – Brinkburn (SP5) and Chuter Ede (SP6)**

##### **4.1 General approach to regeneration sites**

- SP5 (Brinkburn) and SP6 (Chuter Ede) are major brownfield regeneration allocations within the main urban area, involving existing playing fields/open space.
- Council has prepared a **strategic playing field mitigation topic paper** and entered **Statements of Common Ground with Sport England**, though Sport England’s formal objections remain (pending examination and implementation of mitigation).

##### **4.2 Chuter Ede (SP6)**

###### **Planning status and residual site**

- SP6 originally covers the Chuter Ede site including car park, buildings and adjoining open space.
- Permission has been granted for **124 extra-care apartments**, broadly matching SP6’s expectation of ~120 units, on the **car park/buildings footprint**, with very limited loss of playing field.
- Council confirmed the extra-care scheme is under construction; the western part of the residual site is currently used as a **construction compound**, expected to be released after about 2 years.
- Council expects to bring forward **at least 70 additional dwellings** plus ancillary facilities to support sports use on the retained southern pitches.

###### **Playing field mitigation and residual objection**

- The **mitigation strategy** for Chuter Ede is tied to:
  - Enhancements to pitches **south of the current red-line** (retained pitches).
  - Delivery of new playing pitches at the **former Temple Park Junior School site**, which is also referenced in policy SP23 for playing pitch improvements and is Council-owned.
- Council confirmed Temple Park is in Council ownership and will provide replacement/mitigation capacity for the loss at Chuter Ede.
- It was confirmed that, as with Brinkburn, **Sport England’s formal objection remains**, but the SoCG sets out agreed mitigation principles and proposed wording changes to SP6 and supporting text, including specific identification of the Temple Park site.

###### **Trajectory and delivery**

- SHLAA splits Chuter Ede delivery:
  - Approximately 60 units in years 1–5.
  - Balance of around 70 dwellings in years 6–10.
- Inspector suggested the extra-care apartments are likely to complete relatively quickly (typical for flatted schemes), and asked Council to reassess phasing to reflect the under-construction status and 2-year compound use.

###### **Councillor concerns**

- Cllr Taylor emphasised that the **extra-care scheme sits largely on the former car park/buildings footprint** and removed little open space; she would not seek to reverse that element. Her concern is mainly additional building on remaining grassed land and she suggested **reducing the housing number** on the residual grass area to retain more green space for the community.

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### Inspector's position

- Inspector inclined to **retain SP6** as a complete policy (including the now-under-construction extra-care scheme) for clarity about the full vision, rather than removing the developed part from the allocation.
- He signalled that the **trajectory for SP6 should be updated** to reflect the live extra-care construction and realistic phasing of the remaining 70 dwellings.

### Key actions – Chuter Ede (SP6)

- **Action 13 – Council:** Update the **housing trajectory** to reflect earlier delivery of the 124 extra-care units and appropriate timing for the remaining ~70 dwellings after release of the compound.
- **Action 14 – Council:** Implement SoCG with Sport England via main modifications, including:
  - Wording in SP6 and supporting text making clear where playing field mitigation will be located (Temple Park Junior School site and on-site improvements).
  - Cross-reference to SP23 and the playing field mitigation topic paper.
- **Action 15 – Council:** Consider, in light of local concerns, whether to **adjust the residual dwelling number or clarify the extent of retained pitches/green space** in SP6's key considerations.

## 5. Regeneration site SP10 – Riverside

### Development and Port of Tyne interface

- SP10 covers the riverside regeneration area including Hobson's, Middle Dock and Windmill Hill.
- Full permission exists for **299 dwellings**; 96 dwellings are built, 203 remain.
- Development closest to Port of Tyne (phase south of Long Row/Long Row Gate) is fully implemented and occupied; phases 2 and 3 are under construction.
- Port of Tyne raised concerns over proximity of housing to Port/Tynedock Enterprise Park (E19) but these were **resolved at planning application level**, with the Council deciding the scheme's benefits outweigh residual concerns.

### Trajectory

- Council profiles roughly **50 dwellings per year** on SP10 through to 2029/30; two developers are active on site.

### Heritage considerations

- SP10 contains or lies close to multiple heritage assets. Historic England requested stronger policy wording.
- Council has agreed main modifications to SP10 to:
  - Align heritage wording more precisely with **NPPF** policy.
  - Include explicit reference to relevant listed buildings in the **setting** of the site.

### Key actions – SP10

- **Action 16 – Council:** Finalise agreed heritage-wording modifications for SP10 with Historic England and ensure they are captured in the main mods schedule.

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## 6. Regeneration site SP11 – South Shields Town Centre College

- SP11 relates to the South Shields town centre college regeneration.
- Construction of the **college scheme** in the town centre is underway.
- Historic England requested similar **heritage wording changes** as for SP10; Council has agreed in principle.
- Inspector queried whether the policy remains necessary once college development is complete; Council had **no strong preference** either way but indicated SP11 is still consistent with wider ambitions for the area.
- Inspector suggested the Council should check whether SP11 remains materially useful once the present scheme is delivered.

### Key actions – SP11

- **Action 17 – Council:** Confirm whether SP11 should remain in the plan post-construction or be partly rationalised, and in either case agree heritage-wording modifications with Historic England.

## 7. Areas of disagreement or conflict (highlighted themes)

1. **Capacity and deliverability of SP4 sites under policy burdens and BNG**
  - Developers argue SP4 capacities are over-optimistic, citing constraints and post-BNG viability; Council maintains they are robust and evidenced, with H7 showing upward capacity potential.
2. **Treatment of specific sites: H8 (Creamery) and H7 (College)**
  - Disagreement over whether H8 is realistically deliverable and whether the allocation boundary/amenity land is justified.
  - Debate over the appropriate capacity figure for H7 (160 vs 260 vs 198) and how that should be represented in policy and trajectory.
3. **Extent of urban capacity and reliance on Green Belt**
  - Cllr Herbert contends town centres and council-owned car parks could yield more housing, reducing Green Belt release; Council and some developers feel urban sites have largely been exhausted.
4. **Market strength and windfalls**
  - Disagreement about what vacancy rates and non-implementation allowances say about the strength of the local market and the reliability of the trajectory, particularly given recent “Grey Belt”/windfall examples outside the plan.
5. **Playing field mitigation and Sport England’s residual objections**
  - While SoCGs exist, Sport England maintains formal objections to Brinkburn and Chuter Ede until mitigation is secured and phased appropriately.

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## **8. Consolidated list of key actions and responsibilities**

- 1. Update SP4 capacity and mapping for H7 (College).**
  - Responsible: **Council** (Planning Policy)
  - Deliverable: Main modification text (indicative capacity 260 dwellings) and revised policies map; trajectory update.
- 2. Clarify and implement playing field mitigation for H7 (Harton & Westoe and Epinay).**
  - Responsible: **Council** (Development Management / Leisure)
  - Deliverable: Written confirmation of mitigation works, triggers and delivery partners.
- 3. Remove SP4 sites already under construction as allocations and treat as commitments.**
  - Responsible: **Council**
  - Deliverable: Main modification listing de-allocated sites and trajectory adjustments.
- 4. Clarify treatment of permitted but un-started SP4 sites.**
  - Responsible: **Council**
  - Deliverable: Supporting text/trajectory note explaining retention as allocations and reasons.
- 5. Document urban capacity work on council-owned land (including car parks).**
  - Responsible: **Council**
  - Deliverable: Update to SHLAA/justification explaining assessment of town-centre sites and reasons for retention/release.
- 6. Prepare contingency modification for Cleveland Lane industrial estate site.**
  - Responsible: **Council**
  - Deliverable: Draft option to include Cleveland Lane as an SP4 allocation (indicative capacity, subject to appeal), or strengthened justification as a commitment.
- 7. Agree heritage wording changes for SP4 H6 and regeneration policies SP10 and SP11 with Historic England.**
  - Responsible: **Council** with **Historic England**
  - Deliverable: Agreed text for inclusion in main modifications.
- 8. Confirm ownership and availability of H8 amenity land; decide whether to retain or remove H8.**
  - Responsible: **Council**
  - Deliverable: Ownership evidence and either modified SP4 wording (if retained) or justification for deletion (if removed).
- 9. Update SP6 (Chuter Ede) trajectory and wording, including Temple Park mitigation.**
  - Responsible: **Council**
  - Deliverable: Revised phasing for extra-care and residual housing, main modifications implementing SoCG with Sport England and clarifying mitigation locations.
- 10. Consider quantum and layout of residual housing on Chuter Ede to preserve green space.**
  - Responsible: **Council**
  - Deliverable: Potential adjustment to residual dwelling numbers or stronger wording on retained pitches/green space in SP6.
- 11. Review ongoing usefulness of SP11 post-college construction.**
  - Responsible: **Council**
  - Deliverable: Position statement on whether SP11 should remain as a regeneration policy with minor amendments, or be rationalised once development completed.

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## 9. Risks, concerns, and blockers identified by attendees

- **Over-reliance on optimistic site capacities**
  - Risk that several SP4 sites will not deliver at indicative capacity due to BNG, open space and standards, leading to under-delivery against housing requirement.
- **Deliverability of small and constrained urban sites (e.g. H8)**
  - Long history of lapsed permissions, uncertainty over ownership and BNG/amenity conflicts create risk that some allocations will **not come forward in the plan period**.
- **Market conditions and vacancy / non-implementation rates**
  - Rising vacancy rates and reliance on a 10% non-implementation allowance may understate the risk of **non-delivery of commitments**, particularly where large brownfield sites (e.g. Hawthorne Leslie) progress slowly.
- **Dependence on complex playing field mitigation**
  - Delivery of housing at H7, Brinkburn and Chuter Ede is **dependent on timely and fully funded playing field mitigation** at multiple sites (Harton & Westoe, Epinau, Temple Park). Delays or funding issues could block or delay housing.
- **Residual objections from Sport England**
  - Sport England's outstanding objections on Brinkburn and Chuter Ede represent a **soundness and legal risk** until mitigation strategies are fully secured and reflected in policy wording.
- **Uncertainty around Cleveland Lane appeal**
  - Outcome of the appeal may materially affect whether Cleveland Lane counts as an allocation or commitment and thus overall housing supply, introducing short-term uncertainty into the trajectory.
- **Potential under-exploitation of town-centre capacity**
  - Cllr Herbert's evidence suggests a **risk that reasonable brownfield options (multi-storey over car parks, etc.) have not been fully explored**, weakening the case for Green Belt release and exposing plan to "not positively prepared" challenges.
- **Windfall "Grey Belt" decisions outside the plan**
  - Cllr Herbert highlighted recent permissions and proposals on "Grey Belt" around villages, risking **unplanned, ad hoc growth** and erosion of Green Belt if the local plan's allocations and windfall assumptions do not adequately respond to new national policy directions.
- **Timing and phasing of regeneration sites**
  - There is a risk that trajectory phasing for major regeneration sites (Riverside, Chuter Ede, Hawthorne Leslie) does not fully align with real-world build-out rates, potentially overstating early delivery.

\* AI Usage Disclosure: This document was created with assistance from AI tools. Whilst the content has its origins from the recorded transcript it has been reviewed and edited by a human to correct spelling. Non the less, there may be error so please verify any critical information.