

An AI (artificial intelligence) * analysis of the transcript created at the session:
Matter 3 - Spatial Strategy for Sustainable Development (Policy SP3), including housing distribution, the role of the villages, the single strategic site at Fellgate, employment land, and wastewater capacity.

1. Minutes of the Hearing Session

1.1 Opening and Context

- The Inspector opened Matter 3 (Spatial Strategy) for the South Tyneside Local Plan, focused on Policy SP3 and the pattern/distribution of development across the borough.
- The Inspector confirmed a site visit had been carried out, noting the compact nature of the borough, the main urban area north of the borough (south of the River Tyne), and the villages of the Boldons, Cleadon and Whitburn, largely surrounded by Green Belt.
- Key strategic questions identified by the Inspector:
 - Has the plan optimised suitable land in the main urban area?
 - If not, are there exceptional circumstances for Green Belt alteration?
 - Is it appropriate to consider areas adjoining the main urban area?
 - Is a large single sustainable development location appropriate?
 - How much development should be directed to the three southern villages, and on what basis?

1.2 Council's Explanation of the Spatial Strategy (Policy SP3)

- The Council stated the spatial strategy is based on the borough's settlement pattern: compact main urban area and three Green-Belt-wrapped villages.
- The approach is said to follow NPPF, especially:
 - Paragraph 11 (efficient use of land/resources).
 - Paragraphs 119–120 (maximising use of previously developed land and giving substantial weight to suitable brownfield land).
- Main urban area:
 - Criterion 1 of SP3 directs growth to main town centres of South Shields, Hebburn and Jarrow, which contain most residential and employment areas.
 - Criteria 3 and 6 emphasise maximising brownfield land and increasing densities, supported by the Density Paper and Efficient Land Use Paper.
 - The SHLAA/site selection process showed limitations in urban capacity, underpinning the need for Green Belt release, explained in SP3 supporting text.
- Sustainable Growth Areas:
 - Identified around each of the villages and at Fellgate, following extensive evidence on constraints/designations and sustainability appraisal (SA).
 - The Council's MIQ 3.6 response sets out percentage distribution of growth between the main urban area and villages.

1.3 Reasonable Alternatives and Sustainability Appraisal

- SA work was iterative from 2019; initial four spatial options:
 - a. Urban area growth only (no Green Belt release).
 - b. Urban area growth + large-scale Green Belt release.
 - c. Urban area growth + more dispersed Green Belt release.
 - d. Neighbouring authorities taking some unmet need (no Green Belt release in South Tyneside) – rejected as unreasonable because neighbours could not take South Tyneside's need.
- Following consultation, a fifth, "hybrid" option was added: urban growth + a large Green Belt release + smaller Green Belt releases of varying sizes.
- LUC (SA consultants) explained:
 - a. When the fifth option was added, all options were refreshed and appraised to consistent detail.
 - b. An "urban area only" option would not meet the housing figure and may not be "reasonable", but was appraised on a precautionary basis and found unlikely to deliver required housing.

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- c. All options retained an urban-area element; Table 4.8 of the SA shows indicative housing distribution between urban area and Green Belt under each option; Tables 4.6 and 4.10 explain reasons for selecting/rejecting options at different stages.
- Duty to Cooperate:
 - a. Correspondence with neighbouring authorities confirmed they could not accommodate South Tyneside's unmet need, so the "export need" option was not reasonable.

1.4 General Discussion on Strategy and Urban Capacity

- Mr Green (Save Fellgate Working Group):
 - Argued Rohm Haas (Jarrow) should be the main alternative site due to benefits for town centre footfall and regeneration, despite some flood risk.
 - Stated massive housebuilding within ~4-mile radius of Fellgate has overwhelmed infrastructure and that the Council should provide data on total housebuilding in that area (**Inspector indicated this would be explored at Stage 2, not now**).
 - Suggested the plan has overburdened Fellgate without properly accounting for infrastructure and water capacity.
- East Boldon Neighbourhood Forum (Mr Hutchinson):
 - Argued SP3 and SP3.2 are not positively prepared for East Boldon; 263 homes at GA2 (North Farm) plus other schemes (Cleadow Lane 202 homes, Mayfair Glass 9 homes) would increase village housing by ~26% (total 474 homes).
 - Raised impacts on historic character, conservation area, and inadequate transport/medical infrastructure; traffic capacity at A194/Boker Lane and Sunderland Road/Station Road junctions already over capacity at peaks.
 - Asserted Green Belt amendment for GA2 is not justified and exceptional circumstances have not been made; referred to East Boldon Neighbourhood Plan examiner's conclusion that housing need could be met at Cleadow Lane without Green Belt release.
- Cllr Herbert and Labour representatives (Cleadow & East Boldon ward):
 - Emphasised three distinct settlements: East Boldon, West Boldon, and Boldon Colliery, with valued semi-rural character and Green Belt separation, which has been eroded.
 - Claimed housing figures (including Green Belt releases) exceed actual need so Green Belt need not be released.
 - Cllr Herbert cited underused town centre brownfield land in South Shields (car parks west of Fowler Street, vacant Harton Quay/ST House, former Park Hotel site, vacant buildings) and conversions to flats as evidence of additional urban capacity and demand for town-centre living.
- Developer/landowner representatives:
 - Mr Martin:
 - Considered the Council's strategic logic broadly sound (urban first, then villages, then Green Belt) but thought urban capacity assumptions are optimistic.
 - Noted density evidence pre-dates statutory Biodiversity Net Gain and other requirements that reduce net developable area and affect viability.
 - Suggested that due to viability challenges in lower-value urban areas, some allocated sites might not deliver, so additional more "deliverable" sites in higher-value areas should be considered as a safeguard.
 - Mr Smith:
 - Calculated that "urban area only" development would leave a shortfall of about 2,253 homes against standard method needs, so such a strategy would not be positively prepared.

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1.5 Large Strategic Site at Fellgate – Principle and Alternatives

- Council’s position:
 - A large strategic Green Belt release is considered appropriate in principle to meet needs, in line with NPPF paragraph 73 (now 72) on delivering sustainable, large-scale developments.
 - SA 2019 (PR46, Appendix F) defined five “areas of search” for a large strategic Green Belt release: south of Marsden, south of Biddick Hall, south of Fellgate, south of the Boldons, and west of Whitburn.
 - These were assessed against Green Belt purposes, landscape/townscape, biodiversity, historic environment, flood risk, and green infrastructure; the “south of Fellgate” option had the fewest constraints and was taken forward.
 - Initial Regulation 18 consultation (2019) did not include Fellgate as a large release; it was introduced at the second Regulation 18 (2022) alongside the fifth (“hybrid”) spatial option.
- Dispersed Green Belt approach:
 - A more dispersed Green Belt release option (option 4) was fully appraised; it performed poorly in SA terms.
 - LUC explained option 4 combined environmental harm from multiple Green Belt releases without the sustainability benefits of a single, well-master planned large site (e.g. schools, community facilities), representing a “worst of both worlds” outcome.
 - SA Table 4.9: option 4 had six “red” effects and two “green”, the worst performance; option 3 (single large release) had one red and four greens and was among the best-performing options.
- Objections from Save Fellgate / Mr Green:
 - Asserted that SA and other council reports mischaracterise Fellgate’s flood risk (arguing it is within flood zones 3a/3b rather than 1/1a) and proximity to local wildlife sites; referenced SA paragraph 5.21 and other paragraphs (5.22, 5.24–5.26) as being inconsistent with reality.
 - Alleged key constraints (flooding, ecology, proximity to local wildlife sites, etc.) were overlooked, rendering the local plan “**not fit for purpose**” for Fellgate; the Inspector cautioned against alleging fabrication but noted he would check specific SA references.
 - Stated infrastructure, including roads and Northumbrian Water’s systems, is already at or over capacity, and that the plan unfairly concentrates growth at Fellgate while discounting numerous urban brownfield sites.
- Other participants’ views on large site principle:
 - Mr Morton:
 - Highlighted SA Table 4.9 as showing option 3 (single large Green Belt release) clearly outperforms the dispersed option; argued a large site is not only appropriate but, in national policy terms, can represent the best strategy.
 - Considered Fellgate to be contiguous with the most serviced and accessible urban area and well served by public transport.
 - East Boldon Neighbourhood Forum:
 - In principle, favoured a single large strategic site because it could support on-site infrastructure (roads, schools, health facilities) that smaller village sites cannot, and would reduce pressure for further Green Belt release around East Boldon, where other potential sites have previously been ruled out.

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1.6 Role of the Villages: Boldons, Cleadon and Whitburn

- Council's evidence:
 - SA Table 4.5 provides a sustainability overview of Cleadon, Whitburn and the Boldons (assessing size, distance to town centres, public transport, services); the Council says all three villages are broadly comparable in service provision and accessibility and have been treated equivalently in the strategy.
 - Growth distribution:
 - Boldons and Cleadon receive similar levels of growth.
 - Whitburn receives noticeably less, reflecting evidence and site-specific issues (details handled elsewhere in the examination).
 - Climate/carbon audit (c. 2020–2022) shows the most accessible areas are generally in the north and west (main urban area); there have been no major changes in service or transport distribution since that work.
- Relationship with Neighbourhood Plans:
 - East Boldon Neighbourhood Plan was made when the Local Plan was at Regulation 18 stage, under a different need context, and deliberately did not take account of the then emerging allocations.
 - The Inspector noted the statutory framework: a new Local Plan can supersede aspects of a made neighbourhood plan; Local Plans address borough-wide needs, not solely neighbourhood-defined needs.
 - East Boldon Forum and local members seek:
 - Removal of GA2 (North Farm) from the plan;
 - A reduced role for East Boldon in accommodating growth, arguing that the neighbourhood plan's identified need can be met via Cleadon Lane alone and that further allocations would harm character and overburden infrastructure.
- Specific village concerns:
 - East Boldon:
 - Traffic: A194/Boker Lane and Sunderland Road/Station Road junctions already over capacity at evening peaks; East Boldon level crossing causes frequent closure delays and congestion; park-and-ride car park is at capacity, overspill parking affects residential streets.
 - Character: Historic core, Victorian infrastructure, conservation area; cumulative development (GA2, Cleadon Lane, Town End Farm, Moor Lane) could change village character and significantly increase traffic flows.
 - Infrastructure: Concerns that services, roads, social and medical infrastructure cannot support a ~26% increase in housing stock.
 - Whitburn:
 - Developer representatives argued that Whitburn is at least as sustainable as the other villages, with good services and public transport, and that there is no sustainability reason for a reduced role; earlier Reg 18 plans proposed nearly 400 homes here, indicating the Council previously saw capacity.
 - Cleadon:
 - Not extensively debated in this extract, but is considered alongside Boldons in the overall distribution and in relation to wastewater issues.

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- Counter-arguments (developers/landowners):
 - Mr Green (Save Fellgate): argued neighbourhood plans have constrained local capacity unjustifiably and should not override national policy on exceptional circumstances; he noted that Fellgate has no neighbourhood plan and is therefore more exposed.
 - Mr Eaton and Mr Westwick:
 - Stated that villages accommodate ~17% of borough's population and are described in SA as "accessible and popular"; NPPF paragraph 79 encourages village growth where it supports services.
 - For Whitburn, emphasised wide range of services and good public transport, with no intrinsic sustainability problem; some Reg 18 allocations were reduced for reasons other than Whitburn's sustainability.
 - Mr Martin:
 - Emphasised that neighbourhood plans cannot effectively "lock out" further development indefinitely, as strategic plans can and do supersede them; East Boldon could later revise its neighbourhood plan after Local Plan adoption.
 - Argued that growth often enables infrastructure improvements; holding back development due to existing capacity issues may close off those opportunities.

1.7 Wastewater Capacity – Hendon and Howdon

- Council's evidence and approach:
 - The Council relied on:
 - Sewage Management Local Plan Position Statement (IMV13, 2024),
 - Infrastructure Delivery Plan,
 - Statements of Common Ground with Environment Agency and Northumbrian Water.
 - Distribution to treatment works:
 - Approximately 17% of plan housing growth drains to Hendon WwTW; 83% to Howdon WwTW (the Council corrected a factual error in an earlier figure).
 - Northumbrian Water has advised:
 - There is headroom at Howdon over the plan period, and investment/testing is underway to ensure this remains adequate.
 - Hendon also has capacity based on their modelling and planned works; Northumbrian Water and the Environment Agency regulate treatment, which the Council sees as a separate (but coordinated) pollution control regime under NPPF paragraph 188.
- Objections – Mr Latimer and Whitburn Forum:
 - Mr Latimer (retired engineer, fisherman, local business owner) provided detailed historical evidence on the Whitburn/Hendon system:
 - The Whitburn system (pumping station, long sea outfall, interceptor tunnel of c.14,000 m³) was commissioned in 1996 to comply with EU directives and remove multiple small overflows on the beach.
 - Original design assumptions (from Northumbrian Water and the Council):
 - ♣ 99% of the time no flows in the interceptor;
 - ♣ Estimated annual discharge 225,000 m³, c. 20 events / 20 hours per year, in "extreme rainfall" only;
 - ♣ Liquid described as "storm water" (road runoff), not raw sewage.
 - He claimed actual operation has been radically different:
 - ♣ Frequent discharges of foul sewage, including in dry weather; strong odours and material washing ashore.
 - ♣ A Freedom of Information response revealed Environment Agency had warned Northumbrian Water to stop discharging in dry weather; he alleges daily discharges occurred regardless.

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- Population figures:
 - ♣ Original permit was allegedly based on an incorrect Whitburn population of 15,000; flows from East Boldon and Cleadon go via Seaburn and St Peter's and then to Hendon, further stressing capacity.
- Public Inquiry (approximately 2001):
 - ♣ The system went to inquiry where advocates for NW and the EA sought to narrow the scope, but the inspector still imposed conditions, including:
 - Flows arriving at Hendon WwTW must be measured (not just flows leaving or escaping), a condition Mr Latimer asserts has never been properly complied with.
 - ♣ He claimed Council, Northumbrian Water and the EA have all known since the early 1990s that calculations for the system were wrong but allowed construction and operation to continue.
- Environmental impact:
 - ♣ Historically up to 50 small fishing boats moored off Whitburn; he stated none remain, nor are there lobster fishermen now, attributing this to water quality.
 - ♣ He suggested rectifying the system to perform as originally described could cost around £150 million.
- Overall position:
 - Mr Latimer and supporters argued there should be a moratorium on development in Whitburn, Cleadon and the Boldons until proven, monitored wastewater capacity and environmental compliance are secured.
 - They questioned the reliance on Northumbrian Water's professional assurances in the Local Plan evidence and criticised Policy SP3 supporting text for deferring too much to the undertaker rather than applying stricter land-use tests.
- The Inspector:
 - Acknowledged the seriousness of the concerns and the detailed evidence.
 - Noted that policy wording (especially Policy 10 on water) and potential strengthening (e.g. akin to Whitburn Neighbourhood Plan) would be considered separately.
 - Confirmed he would take away the arguments about whether the issues justify restricting development until solutions are demonstrably in place.
- Northumbrian Water:
 - Senior representatives attended and provided professional assurances on modelling, headroom and planned investment (details to be set out in their written/technical evidence referenced by the Council).

1.8 Employment Elements of the Spatial Strategy

- Main employment strategy:
 - Most employment land remains focused in the north of the borough, where supply is tight but where the Council is pursuing qualitative improvement and where there is strong economic activity.
 - The Council recognises demand for a business park with direct strategic-road access, particularly to serve International Advanced Manufacturing Park (IAMP), but:
 - Concluded exceptional circumstances for a 20–25 ha Green Belt business park cannot be demonstrated (Green Belt harm, access, strategic road impacts, land availability issues).
 - Maintains that IAMP-related supply-chain businesses can be accommodated on existing sites without needing a new standalone business park.

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- Wardley Colliery:
 - Identified as a specific sustainable growth area for B2 uses:
 - Previously developed and well screened despite its Green Belt designation.
 - Advantages include proximity to the A184/A194, Follingsby Business Park and the (to-be-reopened) Leamside rail line.
 - Originally considered as potential expansion for Thomas Armstrong (brickworks operator), but the landowner now intends to market the site more broadly; allocation would remove Green Belt constraint and enable flexible industrial use.
- Port of Tyne:
 - SP3 highlights Port of Tyne as a regionally significant employment location; it is a key component of the economic strategy and is explicitly name-checked in the spatial strategy for clarity.

1.9 Miscellaneous Clarifications

- Climate/Carbon Audit:
 - The “carbon audit” or “climate analysis” paper (circa 2020–2022) identifies relative accessibility of locations; it shows the urban north/west as most accessible, and this evidence continues to underpin SP3.
- Town End Farm:
 - A representor pointed out that paragraph 4.33 of the plan incorrectly describes the six “urban and village sustainable growth areas” as being within Whitburn, Cleadon and East Boldon, whereas one includes Town End Farm; they asked for factual clarification to ensure Town End Farm is properly referenced.
- Room/meeting logistics:
 - The Inspector managed time to ensure key agenda items (large strategic site, role of villages, wastewater, employment) were covered and confirmed some detailed issues (e.g. specific sites, viability, Green Belt exceptional circumstances) will be picked up in later sessions.

2. Key Statements or Actions (with Responsible Parties)

#	Statement / Action	Responsible person/body	Notes
1	Confirmed that SP3 is designed around an “urban-first” approach with subsequent Green Belt releases where necessary, guided by NPPF paras 11 and 119–120.	South Tyneside Council (planning policy officers)	Formed the core justification for the spatial strategy.
2	Identified that an “urban only” option would not meet housing need and would likely be unsound, but it was appraised for completeness.	LUC (SA consultant), Council	Based on SA work and MIQ responses.
3	Confirmed neighbouring authorities cannot accommodate South Tyneside’s unmet housing need, rendering “export need” options unreasonable.	South Tyneside Council; neighbouring authorities via DtC	Recorded in DtC correspondence and SA.
4	Stated that a large strategic Green Belt release at Fellgate is appropriate and that an area-of-search exercise identified Fellgate as the least constrained option.	South Tyneside Council	Based on SA Appendix F (2019).

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5	Explained that SA option 4 (dispersed Green Belt releases) performs poorly and that a single large release performs best or among the best in sustainability terms.	LUC	Referenced SA tables 4.9 and related text.
6	Confirmed that the three villages are broadly comparable in services and accessibility and have been treated equivalently in the strategy.	South Tyneside Council	Based on SA Table 4.5 and the carbon audit.
7	Acknowledged a factual error in the proportional distribution of dwellings between Hendon and Howdon WwTW (corrected to 17% Hendon, 83% Howdon).	South Tyneside Council	Correction given orally.
8	Asserted that Howdon has headroom for the plan period and that investment/testing is in progress to confirm capacity at both Hendon and Howdon.	Northumbrian Water; reported by Council	To be supported by NW's technical evidence.
9	Inspector indicated he will check the SA paragraphs cited by Save Fellgate (e.g. SA para 5.21, others) against the chosen Fellgate allocation to understand alleged inconsistencies.	Inspector	Noted explicitly in response to Mr Green.
10	Inspector stated that matters relating to Rohm Haas, other brownfield sites, and detailed Green Belt exceptional circumstances will be examined further at Stage 2 and at specific matter hearings.	Inspector	Sets future agenda.
11	East Boldon Forum and local councillors formally requested a reduced role for East Boldon in the strategy, including removal of GA2 and reliance on Cleadon Lane to meet identified neighbourhood need.	East Boldon Neighbourhood Forum; Cllr Herbert; Cleadon & East Boldon Labour Party	Position put clearly on record.
12	Several developers/landowners requested a greater role for the villages (especially Whitburn and East Boldon) in meeting housing need, citing their sustainability and deliverability advantages.	Various developer reps (e.g. Mr Martin, Mr Eaton, Mr Westwick, Mr Morton)	Position recorded in relation to MIQ 3.7.
13	Inspector confirmed that the relationship between the Local Plan and East Boldon Neighbourhood Plan must be understood in light of the Act's provisions for successor plans; the Local Plan can change context and allocations.	Inspector	Clarified policy hierarchy and legal context.
14	Save Fellgate Working Group challenged the accuracy of flood risk/ecology assessments for Fellgate and requested reconsideration of brownfield capacity and infrastructure evidence.	Mr Green / Save Fellgate	Raises potential evidence-review action for Council.

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15	Mr Latimer and Whitburn Forum effectively called for a moratorium on development in Whitburn, Cleadon and the Boldons until wastewater issues at Hendon/Whitburn are demonstrably resolved.	Mr Latimer; Whitburn Neighbourhood Forum	Strong position noted; the Inspector said he would reflect further.
16	Town End Farm representatives asked for factual correction/clarification in paragraph 4.33 so that Town End Farm is correctly acknowledged among sustainable growth areas.	Town End Farm representative (Mr Smith)	Council agreed to consider this for clarity/effectiveness.

3. Topics of Disagreement or Conflict

3.1 Scale and Location of Housing Growth

- Urban capacity vs Green Belt release:
 - Objectors (residents, some councillors) argue there is more brownfield capacity in the main urban area (especially South Shields) than the Council has assumed, making Green Belt releases (including Fellgate and village-edge sites) unnecessary or excessive.
 - Developers argue the opposite: urban capacity is overestimated (because of viability, BNG, net developable area) and more Green Belt/village sites are needed as a buffer against under-delivery.

3.2 Large Strategic Site at Fellgate

- Council and many developers consider a single large strategic site at Fellgate a justified, sustainable approach, strongly supported by SA results and NPPF guidance on large-scale developments.
- Save Fellgate Working Group disputes:
 - The evidence on constraints (flood risk, ecology, proximity to wildlife sites).
 - The fairness of concentrating growth at Fellgate when other brownfield/Green Belt sites are allegedly discounted on weak grounds.
- Some participants (e.g. East Boldon Forum) support the *principle* of a large site but without expressing support for Fellgate specifically, preferring large strategic growth to dispersed village expansion.

3.3 Role of the Villages (Boldons, Cleadon, Whitburn)

- East Boldon Forum/local members:
 - Seek a reduced role for East Boldon, removal of GA2, and reliance on Cleadon Lane; argue traffic, heritage, parking and infrastructure cannot sustain current planned levels of growth.
- Developer interests:
 - Argue the villages can and should play a greater role, pointing to NPPF para 79, SA descriptions of the villages as accessible and popular, and specific brownfield sites (e.g. Cleadon Lane).
- Whitburn:
 - Local community (via Whitburn NP) have concerns about wastewater and environmental impacts.
 - Developers argue Whitburn is under-used in SP3 and is as sustainable as the other villages.

3.4 Neighbourhood Plan vs Local Plan

- East Boldon Forum contends the made neighbourhood plan and its settlement boundary should be respected, limiting further allocations; they consider GA2 contrary to the neighbourhood plan's intent and character policies.
- Council and developer interests emphasise:
 - The Local Plan addresses borough-wide need and can supersede neighbourhood plans where necessary.
 - East Boldon can revise its neighbourhood plan after Local Plan adoption to reflect new strategic allocations, rather than constraining the Local Plan now.

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3.5 Wastewater Capacity and Environmental Impacts

- Council/Northumbrian Water:
 - Maintain that modelling indicates sufficient headroom at Howdon and Hendon WwTWs, with planned investment and regulatory oversight from the Environment Agency.
 - Emphasise that detailed control of discharges is under other regimes, and that planning should mainly assess land-use acceptability.
- Objectors (Mr Latimer, Whitburn Forum, others):
 - Present historical and observational evidence that the Whitburn/Hendon system is already underperforming and non-compliant with earlier design assumptions and inquiry conditions, with frequent discharges affecting marine environment and fishing.
 - Argue that accepting further growth on the basis of modelling and undertaker assurances is unsafe; they call for a moratorium until monitoring and upgrades are demonstrably in place.
- This is a major point of conflict, with significantly divergent views on both the factual baseline and acceptable risk.

3.6 Employment Strategy and Business Park

- Some stakeholders argue for a new motorway-adjacent business park to capture demand (especially linked to IAMP). The Council acknowledges the demand but refuses such an allocation due to lack of exceptional circumstances and Green Belt/road impacts.
- There was limited direct opposition at this session, but the Council's decision not to allocate such a park remains a contested judgment in earlier representations.

4. Key Actions and Responsibilities

1. Review SA text on Fellgate constraints

- Action: Check SA paragraphs (including 5.21, 5.22, 5.24–5.26 and Appendix site references) cited by Save Fellgate to verify how land parcels and constraints were appraised and how they relate to the preferred allocation boundary.
- Responsible: Inspector (primary review), supported by Council/LUC for clarification if requested.
- Purpose: To determine whether the alleged inconsistencies affect soundness of the Fellgate allocation and SA process.

2. Clarify treatment of Town End Farm in SP3 and supporting text

- Action: Amend/clarify paragraph 4.33 (and any related text) so that Town End Farm is correctly identified among sustainable growth areas and the text matches the policy and allocations map.
- Responsible: South Tyneside Council.
- Purpose: Improve clarity and effectiveness of the plan.

3. Confirm and document Hendon/Howdon capacity and investment

- Action: Provide clear, referenced evidence of the headroom at Hendon and Howdon WwTWs, including:
 - Current permitted and actual loads;
 - Modelled future loads from Local Plan growth;
 - Specific investment and monitoring commitments in current/future water company plans.
- Responsible: Northumbrian Water (technical evidence); Council (to collate into examination library and cross-reference in the Infrastructure Delivery Plan).
- Purpose: To address concerns that existing systems are already overstressed and justify reliance on undertaker assurances.

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4. **Consider whether additional policy safeguards on wastewater are required**
 - Action: Examine whether Local Plan policy on foul water and water quality (likely Policy 10 and SP3 supporting text) should be strengthened, possibly drawing from Whitburn Neighbourhood Plan wording, including:
 - Explicit tests around no deterioration of water bodies;
 - Requirements for phasing or Grampian-style conditions where capacity upgrades are needed.
 - Responsible: South Tyneside Council; Inspector to consider modifications.
 - Purpose: To better align planning decisions with environmental protection, given local evidence and public concern.
5. **Provide Stage 2 housing pipeline and infrastructure evidence**
 - Action: At Stage 2, present a full housing trajectory showing:
 - Consented and allocated sites around Fellgate and across the borough;
 - Associated infrastructure commitments (roads, schools, health, water) and timing.
 - Responsible: South Tyneside Council.
 - Purpose: To test claims of overburdened infrastructure and to assess deliverability of the trajectory, particularly in high-growth clusters such as Fellgate and the villages.
6. **Re-examine urban brownfield capacity assumptions**
 - Action: Review whether key urban brownfield sites highlighted by objectors (e.g. South Shields car parks, Harton Quay/ST House site, Park Hotel and other town-centre opportunities) have been robustly assessed and whether densities and deliverability assumptions remain realistic in light of current market and BNG requirements.
 - Responsible: South Tyneside Council.
 - Purpose: To respond to criticism that urban capacity is underestimated and that brownfield has been prematurely discounted.
7. **Clarify evidence on village infrastructure constraints**
 - Action: Provide consolidated evidence on:
 - Junction capacity and traffic modelling for key routes in and around East Boldon, Cleadon and Whitburn;
 - School, health, and other social infrastructure capacity and planned expansions;
 - Public transport capacity (including East Boldon metro park-and-ride) and any investment plans.
 - Responsible: South Tyneside Council (with inputs from Nexus and other providers).
 - Purpose: To test claims of over-capacity and evaluate whether planned growth is sustainable in practice.

5. Risks, Concerns, and Blockers Raised

5.1 Infrastructure and Transport

- **Road capacity in and around East Boldon/Cleadon/Boldons:**
 - A194/Boker Lane junction and Sunderland Road/Station Road junction already over capacity at evening peaks; further growth (GA2, Cleadon Lane, Town End Farm, Moor Lane) would exacerbate congestion.
 - East Boldon level crossing (full barrier) leads to frequent delays due to metro, regional and freight trains, further constraining road capacity.
- **Metro park-and-ride at East Boldon:**
 - Car park at capacity; overspill parking into residential streets; calls for expansion have not yet resulted in delivery, and upgrades keep slipping in infrastructure plans.
- **Fellgate local network:**
 - Proposed access from a large strategic site onto a 20 mph residential road with three schools and 17 speed humps; objectors argue this is incompatible with major traffic flows.

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An AI (artificial intelligence) * analysis of the transcript created at the session:
Matter 3 - Spatial Strategy for Sustainable Development (Policy SP3), including housing distribution, the role of the villages, the single strategic site at Fellgate, employment land, and wastewater capacity.

5.2 Wastewater and Environmental Quality

- **Hendon/Whitburn system performance:**
 - Alleged mismatch between design assumptions and actual operation: frequent discharges, including dry-weather fouls; failure to measure flows as per public inquiry conditions; possible non-compliance with historic commitments.
 - Perceived environmental damage: loss of small-boat fishing and shellfishing off Whitburn; contamination of bathing waters; significant cost to rectify (~£150m suggested).
- **Capacity assumptions:**
 - Objectors contest that Hendon and Howdon have sufficient headroom; they question modelling that does not reflect observed discharges and historical evidence.
- **Regulatory reliance:**
 - Concern that planning policy defers too heavily to undertaker assurances and pollution control regimes, underplaying land-use's role in limiting further loads until capacity and compliance are assured.

5.3 Green Belt and Settlement Character

- **Loss of Green Belt around villages:**
 - Residents and East Boldon Forum emphasise progressive erosion of Green Belt around Boldons and Cleadon; further losses risk coalescence with Sunderland and loss of semi-rural "feel".
- **Heritage and village character:**
 - East Boldon's conservation area and historic core considered sensitive; high levels of growth seen as risking loss of distinctiveness and character that neighbourhood plan sought to protect.
- **Perception of inequity:**
 - Some feel neighbourhood plans in the villages are protecting some areas but pushing growth onto places like Fellgate without a neighbourhood plan, creating perceived unfairness in spatial distribution.

5.4 Housing Delivery and Viability

- **Urban viability risk:**
 - Developers argue that high densities in low-value urban areas with new constraints (BNG, infrastructure costs) may not be viable, risking non-delivery of urban allocations and undermining the "urban first" strategy.
- **Over-provision vs need:**
 - Some councillors claim the scale of housing including Green Belt allocations exceeds local need, making some Green Belt releases unnecessary; developers counter that the standard method is a minimum, and that supply must buffer for non-delivery.

5.5 Evidence Gaps and Trust

- **SA and constraint evidence at Fellgate:**
 - Allegations that flood risk and ecological constraints have been downplayed or misrepresented, undermining confidence in the SA.
- **Trust in water undertaker and regulators:**
 - Historic disputes (Whitburn inquiry, FOI data) lead some to distrust Northumbrian Water/Environment Agency assurances; this is a material risk to public confidence in the Local Plan's soundness on environmental grounds.

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