



Planning Inspectorate

Examination of the South Tyneside Local Plan

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Examination Website: [Local Plan examination - South Tyneside Council](#)

Inspector's Matters, Issues and Questions – Stage 1

Version 1.0

9 May 2025

Introduction

This document sets out the matters, issues and questions (MIQs) that will be the focus for the examination.

The examination hearings will be held in two stages. These MIQs cover the first stage of hearings only. Separate MIQs for the second stage of hearings will be published at a later date and after the first stage of hearings.

The first stage will consider issues of legal compliance, the amount of development to plan for, the spatial strategy (how and where development is distributed in South Tyneside over the plan period), the strategic approach to Green Belt, and the proposed sites for housing and employment that would require alteration to Green Belt, including, Fellgate, Boldon, Land at Town End Farm, Cleadon, Whitburn, Hebburn and Wardley Colliery.

The second stage of the hearings will consider policies for development management, minerals and waste matters and site proposals and

policies within the main urban area, including regeneration improvement areas. The Questions for the matters to be dealt with during the second stage of hearings will be published separately with a further deadline to submit statements for those matters later in 2025.

There is a separately published Guidance Note providing further advice about how to submit written statements in response the MIQs. There is also a draft programme for the Stage 1 hearing sessions. Details within this programme could be subject to change and participants will be notified by the Programme Officer. The Guidance Note and draft programme will be on the examination webpages.

There are two key deadlines to note at this stage:

A deadline of midday on **3 June 2025**, to inform the Programme Officer if you wish to participate at one or more of the Stage 1 hearings. If you do not respond by this date, it will be assumed that you do not wish to participate (even if you ticked the form in January-March 2024 saying you wished to be heard).

The deadline for statements for Matters 1- 5 is midday on **17 June 2025**. Statements should be submitted to the Programme Officer (preferably in an electronic format - Word or PDF - by email).

Anyone who made representations on the published Plan in January-March 2024 may submit a written statement or statements answering the questions set out in this document. However, these should only be in response to questions that relate to your original representation.

Information about the format, content and length of written statements is set out in the separate Guidance Note. There is also separately published guidance from the Planning Inspectorate on the use of Artificial Intelligence (AI)¹. The Inspector may not consider statements that do not follow the advice in the Guidance Note or on the use of AI.

David Spencer

Examining Inspector.

9 May 2025

¹ <https://www.gov.uk/guidance/use-of-artificial-intelligence-in-casework-evidence>

Matter 1: Legal and Procedural Requirements

Guidance Notes

The principle of this independent Plan Examination taking place.

This Examination has arisen as a consequence of the Secretary of State's intervention on 4 March 2025. It follows two decisions of the full Council of South Tyneside in September 2024 and February 2025 not to submit the Plan for examination. Whether there should have been an intervention is not a procedural matter for this independent Examination. Accordingly, there are no related questions as part of Matter 1. The remit of the Examination is whether the contents of the Plan published in January-March 2024 are sound (against the 4 tests at paragraph 35 of the National Planning Policy Framework (NPPF)) and whether its preparation was compliant with relevant legal and procedural requirements.

For the test of soundness on "consistent with national policy", because the final proposed version of the Plan was published in early 2024, transitional arrangements in both the December 2024 NPPF and the December 2023 NPPF mean the South Tyneside Local Plan will be examined against the NPPF published on 5 September 2023. All NPPF paragraph references in these MIQs are to the September 2023 version.

The Duty to Cooperate

The Duty to Cooperate (DtC) is a specific legal requirement to maintain effective cooperation on strategic matters that cross administrative boundaries. There are defined bodies to which the Duty applies.

Sections 3 and 4 of the submitted Duty to Cooperate Statement [document SUB5] outline how plan-making in South Tyneside has engaged with neighbouring authorities, other DtC bodies and similar stakeholders. The legal DtC does not apply to Neighbourhood Forums.

A key strand of demonstrating the Duty are signed statements of common ground. These are provided at Documents SUB5a-5j.

Following submission of the Plan in March 2025, the Council has provided further records of its ongoing engagement with neighbouring authorities on meeting housing and employment needs in Document POSTSUB9.

Consultation

There are many representations, particularly in relation to proposed alterations to the Green Belt, that submit that consultation on the Plan has not been in accordance with the Statement of Community Involvement (SCI). Further statements on this point may wish to reference specific parts of the SCI [document SUB7] and the Council's Regulation 22(c) Statement of Consultation [document SUB8].

Other legal compliance matters

Under Matter 1, the Examination will look at the broad legal compliance of the work undertaken for the Habitats Regulations Assessment, the Sustainability Appraisal report and in relation to legal provisions for Local Plans to address Climate Change (at Section 19(1A) of 2004 Planning & Compulsory Purchase Act 2004). The detail of how the Habitats Regulations and Sustainability Appraisal have considered individual policies and sites will be considered further under the relevant matter. Policies that have a more direct relationship to climate change, for example, renewable energy, flood risk, design standards and transport will be considered as part of the Stage 2 hearings later this year.

Issue 1: The Duty to Cooperate

Q1.1 Having regard to the Duty to Cooperate Statement and the signed statements of common ground [Documents SUB5, SUB5a-j; and POSTSUB9], is there any substantive evidence to indicate that the Council has failed to comply with the duty to cooperate during the preparation of the Plan up and until the date on which it was submitted for examination?

Q1.2 Has the Council engaged effectively, and on an on-going basis, with neighbouring authorities in terms of whether development needs over the plan period could be accommodated outside of the plan area so as to avoid/reduce the need to alter the Green Belt in South Tyneside?

Q1.3 Have cross-boundary matters with Gateshead Council been satisfactorily resolved for the purposes of plan-making prior to

submission in March 2025 in respect of concerns regarding potential impact on the wider highways network from proposed growth in the Plan close to their administrative boundary? Is this suitably demonstrated in the signed Statement of Common Ground [Document SUB5a]?

Q1.4 Should the Examination be concerned that there is no statement of common ground with Newcastle City Council as a neighbouring authority?

Issue 2: Sustainability Appraisal (including the requirements of Strategic Environmental Assessment)

Q1.5 Is there any substantive evidence that the sustainability appraisal report [Document SUB3] fails to meet relevant legal requirements, including the consideration of reasonable alternatives?

Q1.6 Is the methodology in the sustainability appraisal report sound and consistent with relevant guidance including the National Planning Practice Guidance (PPG)?

Issue 3: Habitats Regulations Assessment (HRA)

Q1.8 Is there any substantive evidence to indicate that the Habitats Regulation Assessment [Document SUB4] fails to meet the relevant legal requirements?

Q1.9 – The Statement of Common Ground with Natural England [Document SUB5j] refers to an updating of visitor surveys [Document NAT25] to consider whether there have been any changes to recreational use of coastal areas and a recent Coastal Mitigation Position Statement (2025) produced by South Tyneside Council [document NAT27]. Is the 7.2km recreational buffer identified in the Local Plan and in the January 2024 HRA robust and effective in ensuring a conclusion of no adverse effects on the integrity of qualifying features of the Durham Coast SAC and/or the Northumbrian Coast SPA/Ramsar?

Q1.10 Several representations refer to the capacity of waste water treatment and the potential adverse impacts of growth during the plan period on water quality, including discharges at the coast at Whitburn and Hendon. Is the HRA in Section 4 robust in concluding that the Plan would have no adverse effects regarding water quality impacts on the qualifying features of the Durham Coast SAC and Northumbria Coast SPA/Ramsar?

Issue 4: Other legal and procedural requirements

Q1.11 Is there any substantive evidence that the public consultation carried during the preparation of the Plan did not accord with the Council's Statement of Community Involvement?

Q1.12 Is there any substantive evidence that the requirements of Section 149 of the Equality Act 2010 (the public sector equality duty) have not been met?

Q1.13 Does the Plan accord with Section 19(1A) of the Planning and Compulsory Purchase Act 2004 and national policy in that it includes policies designed to secure that the development and use of land in South Tyneside contributes to the mitigation of, and adaptation to, climate change?

Q1.14 Has preparation of the Plan been undertaken in accordance with the Local Development Scheme?

Q1.15 Is it clear how the Local Plan will relate to the International Advanced Manufacturing Park (IAMP) Area Action Plan (2017) in forming the Development Plan for the area? A new Area Action Plan for the IAMP is currently being prepared and has reached an advanced stage. Are any modifications likely to strategic policies in the Local Plan as a consequence of evidence from the ongoing plan-making process for the IAMP?

Q1.16 Is it necessary for soundness to largely repeat national planning policy at Policy SP1 of the Plan in setting out a presumption in favour of sustainable development?

Matter 2: Amount of Development Needed in the Plan Area

Guidance Notes

Policy SP2 of the Plan seeks to deliver at least 5,253 new homes, 49.41 hectares of land for economic development (not including the International Advanced Manufacturing Park) and sufficient infrastructure to support identified needs.

National planning policy states that in determining the minimum number of homes needed, strategic policies should be informed by a local

housing need assessment, conducted using the standard method in national planning guidance, unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals.

National planning policy also states that planning policies should create conditions in which businesses can invest, expand and adapt. Planning policies should positively and proactively encourage sustainable economic growth, should meet anticipated needs over the plan period and be flexible enough to accommodate needs not anticipated in the Plan.

Issue 1: Plan Period

Q2.1 The Plan covers the period 2023 to 2040. The NPPF at paragraph 22 states that strategic policies should look ahead over a minimum 15 year period from adoption (assumed to be late 2026 in the latest March 2025 Local Development Scheme [Document SUB6]). To be consistent with national policy and to be effective, should the Plan period be modified to 2041/42? Can the wider evidence base support an amended plan period or has it largely been compiled to look ahead to 2040 only?

Q2.2 In determining housing need, the Plan uses the national standard methodology for establishing local housing need. The standard method is forward looking and uses an annually updated affordability ratio, issued in the March of each year. Would it be necessary for soundness to amend the base date of the plan period to reflect local housing need in South Tyneside as of 1 April 2024 (using the 2023 affordability ratio published in March 2024)? Would doing so, have implications for other parts of the evidence base?

Issue 2: Housing Need

Q2.3 Having regard to the evidence in the 2023 Strategic Housing Market Assessment [document HOU4], is the housing need of 309 homes a year, using the standard methodology for establishing local housing need, justified, positively prepared, consistent with national policy and effective?

Q2.4 The standard method for establishing local housing need uses the 2014-based household projections (PPG paragraph 2a-004-20201216). The NPPF at paragraph 61 anticipates that local housing needs will be

informed by an assessment that uses the standard method. For South Tyneside, are there exceptional circumstances to justify an alternative approach to assessing the scale of local housing need which also reflects current and future demographic trends and market signals?

Q2.5 Having regard to PPG paragraph 2a-015-20190220, are there the exceptional circumstances in South Tyneside to use the 2018-based household projections as part of the formula for establishing the scale of local housing need?

Q2.6 Are there the circumstances² in South Tyneside to justify establishing a higher level of housing need than the minimum 309 dwellings per annum? For example, delivering additional affordable housing to meet local needs or extra housing to support the economic growth plans of the North East Local Enterprise Partnership (now part of the new North East Combined Authority (NECA)) and the Council's own economic objectives, including post Covid recovery?

Q2.7 In particular, does the cross-boundary International Advanced Manufacturing Park with Sunderland generate a need for additional housing than the standard method indicates?

Q2.8 Are there any unmet housing needs from neighbouring authorities that South Tyneside should agree to take on?

Q2.9 Is it reasonable, that as a starting point, the minimum housing requirement is the same as the local housing need figure of 309 dwellings, resulting in the figure of 5,253 net additional dwellings in Policies SP2 and SP16?

Issue 3: Employment Land Requirements

Q2.11 Is the amount of employment land being planned for over the plan period, sufficient to support a strong, competitive economy in South Tyneside? Is there sufficient flexibility to accommodate needs not anticipated in the Plan?

Q2.12 Is the methodology of the Employment Land Review justified in distinguishing the specific needs/demands for users at the International Advanced Manufacturing Park from the demand and supply balance for general employment uses?

² Planning Practice Guidance 2019: paragraph 2a-010-20190220.

Q2.13 Having regard to the evidence and scenarios in the 2023 Employment Land Review [document EMP1] and the analysis in the Employment Land Technical Paper [document EMP2], is the Plan justified, positively prepared and consistent with national policy in pursuing Scenario 3 (the policy-on labour (jobs) demand scenario) plus a buffer? Would this approach result in reasonable alignment with the proposed housing numbers to result in sustainable patterns of development?

Q2.14 The selected approach (Scenario 3 plus buffer) results in a requirement for 41.7 hectares of employment land over the plan period, which exceeds other scenarios (labour supply and past trends). Nonetheless, is there a significant risk that the Plan has underestimated the demand / need for employment land over the plan period and this may unacceptably constrain the local economy?

Q2.15 Has Sustainability Appraisal considered all reasonable options for the scale / amount of employment land to be planned for?

Q2.16 The chosen scenario seeks to reflect potential impacts of the International Advanced Manufacturing Park (IAMP) to positively create significant employment opportunities more widely in the area. Is that justified? Is there reasonable confidence regarding future delivery at the IAMP in terms of infrastructure investment, the take-up to date, its inclusion within the North East Investment Zone and the ongoing review of the Area Action Plan?

Matter 3: The Spatial Strategy for Sustainable Development

Issue 1: Policy SP3 – the Spatial Strategy

Q3.1 Taking account of the nature, characteristics and settlement pattern in South Tyneside, is the Spatial Strategy set out in the Plan at Policy SP3 justified?

Q3.2 Does the Plan take account of reasonable alternatives (informed by Sustainability Appraisal) and is the spatial strategy based on proportionate evidence?

Q3.3 A key strand of the spatial strategy is to identify a single, strategic Growth Area (Fellgate) for residential development. The NPPF at

paragraph 73 says that the supply of large numbers of new homes can often best be achieved through planning for larger scale development, provided they are well located and supported by the necessary infrastructure and facilities. Is a single large strategic site a justified approach as part of an appropriate strategy for South Tyneside?

Q3.4 The Employment Land Technical Paper [EMP2] refers to a new business park (circa 25ha) being a logical way to meet employment land needs. The paper addresses Green Belt options for a greenfield business park site and explains why they have been discounted (against a minimum 20ha threshold). Was this approach (i.e. a single business park) justified based on the Employment Land Review evidence or were there reasonable alternatives to look at more dispersed patterns of new greenfield sites for employment?

Q3.5 Point 7 of Policy SP3 outlines that general employment needs would be met through land supply at designated Employment Areas (including Port of Tyne) and allocating land at Wardley Colliery. Is that a justified and effective approach as part of the spatial strategy?

Q3.6 What would be the broad distribution of housing and employment growth in the Local Plan over the plan period by location when applying the spatial strategy in Policy SP3 – i.e. the amount in the Main Urban Area, the Fellgate Sustainable Growth Area, Town End Farm, the Boldons, Cleadon and Whitburn?

Q3.7 Are there any factors which indicate that the Boldons, Cleadon and Whitburn should have a reduced role because of a limited ability to sustainably accommodate growth? Conversely, has plan-making unreasonably constrained the scope and potential of these settlements to have a greater role in the Spatial Strategy to sustainably accommodate a higher level of growth?

Q3.8 Has sustainability appraisal, and plan-making more generally, taken into account all constraints to development in South Tyneside?

Q3.9 Is the capacity to appropriately treat wastewater arising from growth a fundamental constraint on how much development should be planned and how and where development should be distributed in the Plan area? Does the Council's evidence, including the Sewage Management – Local Plan Position Statement 2025 [document INV13], Infrastructure Delivery Plan [INV1] and statements of common ground with the Environment Agency [SUB5d] and Northumbria Water [SUB5e]

sufficiently demonstrate that the existing treatment works at Howdon and Hendon will cope with the demands from the Plan's proposed distribution of growth?

Q3.10 Overall, is the Spatial Strategy in Policy SP3 an appropriate strategy for the Plan area?

Matter 4: Strategic Approach to the Green Belt and General Approach to Site Selection.

Issue 1: Strategic Approach to the Green Belt

Guidance Notes:

This matter will focus on the overall approach to Green Belt in the Plan and the fundamental matter of whether there are, at a high level, because of the need for development, a case for exceptional circumstances to alter Green Belt boundaries through this Local Plan can be made out.

The test for altering Green Belt boundaries through strategic policies in a local plan is "exceptional circumstances" rather than the test of "very special circumstances" when considering planning applications for inappropriate development in the Green Belt. The 'Calverton' case law, referenced in the Green Belt Review [GRB1], the Green Belt Exceptional Circumstances Paper [GRB2] and by representors to the Plan identified five matters to consider when assessing whether 'exceptional circumstances' are present.

This examination is considering whether the Plan is consistent with national policy. This includes the September 2023 version of the National Planning Policy Framework (NPPF). This Matter will look closely at how the submitted Plan's over-arching approach to Green Belt land is consistent with paragraphs 141-143 of the NPPF. Specific proposals for development that would require altering Green Belt boundaries are considered separately under Matter 5.

In responding to these questions, it would be helpful if the Council's evidence is taken into account and referenced where necessary, including, the 2023 Green Belt Review [Document GRB1], the Green Belt Exceptional Circumstances Paper [Document GRB2], the Housing Site Selection Topic Paper [Document HOU3], the Strategic Housing

Land Availability Assessment [Document HOU5], the Density Report [Document HOU6], the Efficient Use of Land paper [Document HOU7] and the Employment Land Technical Paper [Document EMP2].

Q4.1 Were all reasonable options for meeting the identified need for housing and employment development on land in the Plan area that is **not** in the Green Belt fully examined during the preparation of the Plan? Is this demonstrated in the Strategic Housing Land Availability Assessment and Employment Land Review?

Q4.2 When identifying suitable sites within the main urban area, including the identified Regeneration Improvement Areas, does the evidence show that plan preparation has sought to make effective use of available land including making as much use of possible of suitable brownfield sites and underutilised land and optimising the density or capacity of sites to accommodate development?

Q4.3 Is there any substantive evidence that the capacity of suitable, deliverable and achievable land/sites within existing built-up areas has been significantly under-estimated? Are there any significant sites or opportunities that plan-making has overlooked?

Q4.4 Are there factors (for example, green open spaces, heritage, flood risk, lawful industrial operations³) which place constraints on the amount of development that could be sustainably accommodated within the existing urban area and settlements in South Tyneside? Has plan-making, including the site selection process, taken a reasonable approach in this regard?

Q4.5 Further to the questions in Matter 1 regarding the legal Duty to Cooperate, is there any substantive evidence to indicate that relevant neighbouring authorities outside the Plan area could accommodate the shortfall in housing or employment land development identified as being needed in South Tyneside that cannot be accommodated on non-Green Belt land?

³ For example, see the representations on the Plan from Port of Tyne raising their concerns about additional housing closer to their commercial operations.

Q4.6 Does the residual need for development, that cannot be accommodated within existing built-up areas and/or within a neighbouring authority area comprise, at a strategic level, a basis for reaching a judgement that exceptional circumstances do exist to change Green Belt boundaries in South Tyneside as part of this Local Plan?

Q4.7 Does the 2023 Green Belt Review apply a reasonable and appropriate methodology? Including how the study has assessed the purposes of Green Belt and the potential harm to these purposes and how land within the Green Belt has been assigned into parcels for assessment. Are the size of the land parcels that have been assessed justified or would further subdivision of land parcels be necessary to inform a sound Plan?

Issue 2: General Approach to Site Selection and Green Belt boundaries.

Guidance Notes

This issue addresses the general approach to site selection, including where sites have been identified requiring alteration to the Green Belt whether resultant boundaries would be defined in a way consistent with NPPF paragraphs 142 and 143.

*The Council have produced a Site Selection Topic Paper [HOU3] which is accompanied by mapping and detailed appendices for locations within South Tyneside. The Topic Paper deals with both housing and employment sites. The site selection process should involve a clear audit trail of sites that have submitted through 'call for sites' or otherwise known to the Council. Consideration of the site selection process will take account of the evidence in the Strategic Housing Land Availability Assessment [HOU5], the Employment Land Review [EMP1], the Green Belt Review [GBR1], the Employment Land Technical Paper [EMP2] and the Sustainability Appraisal Report [SUB3]. It is not for the Examination to get into the finer details of how sites have been appraised or scored. The soundness test for "justified" is **an** appropriate strategy, not **the most** appropriate strategy. Accordingly, the threshold is whether the Council's approach/methodology to site selection has been reasonable and whether the planning judgements when assessing sites have also been reasonable and based on proportionate and correct evidence.*

Q4.8 Were the allocations in the Plan selected using an appropriate methodology, based on proportionate evidence?

Q4.9 Is there a clear audit trail of how sites have been assessed, where unreasonable options have been discounted and how reasonable options have been appraised to identify the preferred sites presented in the Plan for allocation?

Q4.10 Have all reasonable options for site allocations been assessed on a comparable basis in the sustainability appraisal report? Are the criteria for assessing site options in the sustainability appraisal report appropriate for South Tyneside and have reasonable judgements been applied? Are any site appraisals in Appendix F of the Sustainability Appraisal report fundamentally wrong such that the judgments applied are ultimately unreasonable and the outputs flawed?

Q4.11 In terms of the overall approach to selecting sites for allocation that require alteration to the Green Belt, was first consideration given to land which has been previously developed and/or is well served by public transport?

Q4.12 Has the Plan considered how the impact of proposing to remove land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt?

Q4.13 Would it be necessary for soundness that Green Belt boundaries are further altered in this Plan to 'safeguard'⁴ land in order to meet longer-term development needs stretching well beyond the plan period?

Q4.14 In defining the Green Belt boundaries in this Plan, does the evidence demonstrate that Green Belt boundaries will not need to be altered at the end of the plan period? Are the proposed boundaries to the Green Belt in the Plan capable of enduring beyond the plan period?

Q4.15 During the course of plan preparation, proposals to further alter the Green Belt (proposed allocations and proposed safeguarded land) were consulted on at Regulation 18 in 2022 but subsequently revised and not presented in the Regulation 19 Plan in 2024. Is this approach justified and supported by the evidence available, including the Green Belt Review, Sustainability Appraisal and the Council's overall approach to site selection that now underpin the submitted Plan?

⁴ As set out in the NPPF, safeguarded land is land which would be removed from the Green Belt but is not allocated for development at the present time. It would no longer be Green Belt, but the permanent development of safeguarded land should only be granted following an update to a plan which proposes the development.

Matter 5: Strategic allocations that would require an alteration to the Green Belt boundary.

Guidance Notes

This matter deals with Policy SP7 (Urban and Village Sustainable Growth Areas), Policy SP8 (Fellgate Sustainable Growth Area), and Policy SP14 (Wardley Colliery).

The Examination focuses on the proposals that are in the Plan and whether they are sound. It is not the role of the Examination to consider the merits of alternative sites that have not been proposed for allocation – often known as ‘omission’ sites. The approach to site selection is addressed separately in Matter 4. There are, however, some questions in this Matter relating to the boundaries of the proposed strategic allocations to address those soundness representations which seek that the proposed sites be enlarged or altered to secure sustainable development and/or ensure the adopted Green Belt boundaries would be consistent with paragraph 143 of the NPPF.

Issue 1: Fellgate Sustainable Growth Area – Policy SP8

Guidance Notes:

This matter considers the soundness of the proposal for the Fellgate Sustainable Growth Area at Policy SP8 of the Plan.

The Council has separately produced a Fellgate Sustainable Growth Area Supplementary Planning Document (SPD): Site Capacity and Opportunities Paper [Document HOU1]. This was consulted on at the same time as the published Plan in January-March 2024. It is not for this examination to consider the soundness of the content of a draft Supplementary Planning Document, the focus will be on Policy SP8. The 2024 SPD Paper can, however, be referred to as part of the evidence base in terms of whether Policy SP8 and the principle of removing land from the Green Belt at Fellgate would be a sound approach.

Q5.1 Is the Green Belt Study evidence in relation to Parcel FE2 and its assessment findings in Chapter 5 and Appendix B relating to the Fellgate site proposed in Policy SP8 and harm to Green Belt justified and consistent with national policy? Has the approach to the proposed

growth area at Policy SP8 avoided areas of higher Green Belt harm from being developed?

Q5.2 Does Policy SP8 reflect the Green Belt Study assessment on any site specific mitigation measures or compensatory improvements set at Appendix C of the Study?

Q5.3 Has the site been adequately assessed through the Strategic Housing Land Availability Assessment [Document HOU5]?

Q5.4 Has the site been suitably assessed through the Sustainability Appraisal document?

Q5.5 Would altering the Green Belt further to safeguard land south of the proposed Growth Area to the boundaries of the A184 and A194 be necessary for soundness as part of this Plan, in terms of consistency with NPPF paragraph 143?

Q5.6 Would the proposed site involve any best and most versatile agricultural land (Grades 1-3a)? If so, is the identification of this site consistent with NPPF paragraph 174?

Q5.7 Would the impact on West Fellgate Farm, which is described by some representors as a community asset, justify deleting or modifying the growth proposal?

Q5.8 Is the Fellgate Sustainable Growth Area a location that is well-served by public transport?

Q5.9 Would it be necessary for soundness to require a reference in Policy SP8 to assessing potential impacts on the Monkton footpath level crossing to the north of the site?

Q5.10 Have the potential impacts of the proposed development on traffic and transport infrastructure been identified, assessed and taken into account at a level which is proportionate to plan-making? Are the 2023 Traffic Assessment [document INV5) and the 2024 Strategic Road Network Forecast Report robust?

Q5.11 Can any significant impacts on the transport network (in terms of capacity and congestion) or on highway safety arising from the growth proposals at Fellgate be cost effectively mitigated to an acceptable degree?

Q5.12 Is this agreed with National Highways (who are responsible for the strategic road network – the A19 and sections of the A184 and A194(M)) and Gateshead Council?

Q5.13 Would it be necessary for soundness to have references in Policy SP8 to mitigating impacts on the highway network in Gateshead's administrative area and/or adopting a 'Vision-led' approach⁵ to reduce the need to travel by car?

Q5.14 Are there any critical transport infrastructure interdependencies that would affect how the proposed development could come forward? For example, when would any mitigation at the White Mare Pool interchange be likely required? Is off-site transport infrastructure affected by any delivery issues (i.e. requiring land not in the control of highway authorities and/or the site promoters)?

Q5.15 Are the proposed modifications at Section 4.2 in the Statement of Common Ground National Highways [Document SUB5g] necessary for soundness?

Q5.16 Can the site be developed using land for residential development which has the lowest risk of flooding from any source and in a way which would not increase flood risk elsewhere, particularly given the presence of the Calfclose Burn and existing drainage measures put in place to protect nearby communities?

Q5.17 Are the requirements for a local centre and a primary school justified?

Q5.18 Does Policy SP8 provide an effective framework for addressing impacts on biodiversity and ecological connectivity? Would this be appropriately addressed by other policies of the Plan and/or the separate Supplementary Planning Document?

Q5.19 The site is identified for approximately 1200 homes. Is that a reasonable capacity for the site having regard to other requirements in Policy SP8 for infrastructure, landscaping, open space, biodiversity net gain and sustainable drainage? Is the 1200 home figure supported by the initial site assessment work in the Fellgate Site Capacity and Opportunities Paper [HOU1], Site Frameworks [HOU2], and the Strategic Housing Land Availability Assessment [HOU5]?

⁵ Advocated in Department for Transport Circular 01/22 for the Strategic Road Network

Q5.20 When would earliest housing completions be expected on the site? Would delivery of the proposed 1200 homes extend beyond the end of the submitted plan period of 2040?

Q5.21 Various requirements are identified for the site in Policy SP8, including 25% affordable housing, a primary school, local services and facilities, transport infrastructure, good quality green and blue infrastructure, biodiversity, sustainable drainage and high quality design. The site would also be subject to other policy requirements in the Plan. Is there proportionate evidence as part of plan-making to show that the Fellgate proposal can be assumed to be viable and deliverable?

Q5.22 Would it be necessary for soundness for Policy SP8 to require the Fellgate Growth area to specifically provide for older persons or supported living accommodation? Could this be reasonably dealt with under Policy 17 of the Plan?

Issue 2: Land at South Tyneside College, Hebburn Campus – Policy SP7, Site GA1

Q5.23 Is the Green Belt Study evidence in relation to Parcel HE1 and its assessment findings in Chapter 5 and Appendix B relating to Site GA1 and harm to Green Belt justified and consistent with national policy? Has the approach to Site GA1 avoided areas of higher Green Belt harm from being developed?

Q5.24 Does Policy SP7 reflect the Green Belt Study assessment on any site specific mitigation measures or compensatory improvements set at Appendix C of the Study?

Q5.25 Would it be necessary for soundness to amend (expand) the proposed site boundaries to deliver sustainable development at the site?

Q5.26 Was the site last used as a playing field? If so: (i) Does the latest Playing Pitch Strategy and Action Plan confirm that there is no surplus of playing pitch provision in South Tyneside?; and (ii) Is the Plan justified in allocating the site for primarily residential development? Would a loss of playing field provision be justified and capable of effective mitigation consistent with paragraph 99 of the NPPF?

Q5.27 Is the indicative capacity of the site at 115 dwellings justified and an effective use of the site in combination with any site constraints and opportunities?

Q5.28 Are the 'key considerations' in Policy SP7 justified (including the evidence in the 2023 Site Frameworks document [HOU2]) and must they be satisfied in order to secure sustainable development on the site?

Issue 3: Land at North Farm, East Boldon – Policy SP7, Site GA2

Q5.29 Is the Green Belt Study evidence in relation to Parcel BO-N3 and its assessment findings in Chapter 5 and Appendix B relating to Site GA2 and harm to Green Belt justified and consistent with national policy? Has the approach to Site GA2 avoided areas of higher Green Belt harm from being developed?

Q5.30 Does Policy SP7 and the key considerations for Site GA2 reflect the Green Belt Study assessment on any site specific mitigation measures or compensatory improvements set out at Appendix C of the Study?

Q5.31 Is the site well-related to services and facilities in East Boldon and in a location well served by public transport?

Q5.32 Given the existing East Boldon Neighbourhood Plan (EBNP) and East Boldon Design Guide (EBDG), is the Plan positively prepared, justified and consistent with national policy in proposing to allocate Site GA2? Would it be effective that a key consideration for Site GA2 in Policy SP7 is to "have regard to EBNP and EBDG"?

Q5.33 Has the proposed indicative capacity of 263 dwellings and the proposed key considerations for Site GA2 in Policy SP7 taken appropriate account of the wildlife corridor in the north-eastern part of the site?

Q5.34 There are no social, utilities or transport infrastructure considerations /requirements identified for GA2 in Policy SP7. Is that justified by the evidence in the Infrastructure Delivery Plan [Document INV1]?

Q5.35 Would there be any significant impacts from the proposed development on the highway network and public rights of way network that would require mitigation? Are modifications needed to the key considerations for Site GA2 to ensure that any impact on operational

safety at the Boldon Lane and/or Tile Sheds level crossings is taken into consideration?

Q5.36 Would the proposed site involve any best and most versatile agricultural land (Grades 1-3a)? If so, is the identification of this site consistent with NPPF paragraph 174?

Q5.37 Can the site be developed using land for residential development which has the lowest risk of flooding from any source (including surface water) and in a way which would not increase flood risk elsewhere?

Q5.38 The site would be subject to proposed Policy 18 (to provide 25% affordable housing) and Policy 19 (Housing Mix) of the Plan. Would that provide an effective approach or would it be necessary for plan soundness to set specific requirements for this site, including provision for older persons housing?

Q5.39 The indicative capacity of the site is 263 dwellings. Having regard to the evidence in the site frameworks document [HOU2] and Strategic Housing Land Availability Assessment [HOU5] is that justified?

Q5.40 Is the forecast trajectory of when this site could deliver, reasonable and justified?

Issue 4: Land to North of Town End Farm – Policy SP7, Site GA3

Q5.41 Is the Green Belt Study evidence in relation to Parcel SU1 and its assessment findings in Chapter 5 and Appendix B relating to the Site GA3 and the degree of harm to Green Belt purposes justified and consistent with national policy? Has the approach to Site GA3 avoided areas of higher Green Belt harm from being developed?

Q5.42 Do the 'key considerations' for Site GA3 in Policy SP7 reflect the Green Belt Study assessment on any site specific mitigation measures or compensatory improvements set at Appendix C of the Study?

Q5.43 Would development of the site affect the setting of any Listed Buildings? Is there agreement with Historic England on the soundness of Policy SP7 for Site GA3 and the need to conserve and enhance the historic environment?

Q5.44 Is the site well-related to services and facilities and in a location well served by public transport?

Q5.45 How has transport assessment work for the Plan assumed access to Site GA3? Are concerns about the impact on the highway network in Boldon and Town End Farm justified?

Q5.46 Would the 'key considerations' for Site GA3 in Policy SP7 be effective in assimilating the proposed development into its landscape setting (including Boldon Hill) and protecting existing features of biodiversity value (including the Downhill Quarry Local Wildlife Site)?

Q5.47 The site would form an extension to a built up area within Sunderland's administrative boundary and close to the joint International Advanced Manufacturing Park employment designation. Does the Infrastructure Delivery Plan [document INV1] and/or dialogue with Sunderland City Council reflect potential impacts on infrastructure within Sunderland's area arising from the proposed 400 homes?

Q5.48 Is it justified and effective that the 'key considerations' for Site GA3 contain no social or transport infrastructure requirements? Is that supported by the Infrastructure Delivery Plan evidence?

Q5.49 Can the site be developed using land for residential development which has the lowest risk of flooding from any source (including surface water) and in a way which would not increase flood risk elsewhere?

Q5.50 Can the proposed site viably deliver some 400 new homes including 20% affordable housing as proposed in Policy 18 of the Plan (by reference to Map 22)?

Q5.51 Is the forecast trajectory of when and how this site could come forward, reasonable and justified?

Issue 5: Land at West Hall Farm, Cleadon – Policy SP7, Site GA4

Q5.52 Is the Green Belt Study evidence in relation to Parcel CL5 and its assessment findings in Chapter 5 and Appendix B relating to Site GA4 and harm to Green Belt justified and consistent with national policy? Has the approach to Site GA4 avoided areas of higher Green Belt harm from being developed?

Q5.53 Does Policy SP7 and the key considerations for Site GA4 reflect the Green Belt Study assessment on any site specific mitigation measures or compensatory improvements set out at Appendix C of the Study?

Q5.54 Can the site be developed for housing in accordance with the Habitats Regulations and a conclusion of no adverse impact on the qualifying features of the Durham Coast SAC and Northumbria Coast SPA/Ramsar? Is it justified and legally compliant with the Regulations to require at least one season's additional non-breeding monitoring data for wading birds for fields within 500 metres of the site? What is this part of the policy seeking to achieve and would it be justified and effective?

Q5.55 Is the site well-related to services and facilities in Cleadon and in a location well served by public transport?

Q5.56 Is the 'key consideration' to explore the opportunity for improving the existing staggered junction of Moor Lane with Sunderland Road justified? Would it be effective as part of any package of measures to ensure development of the site (some 259 dwellings) would not result in an unacceptable impact on highway safety or the residual cumulative impacts on the road network would not be severe?

Q5.57 The 'key considerations' for Site GA4 identify no social or utility infrastructure requirements. Would that be an effective approach and is it justified by the evidence in the Infrastructure Delivery Plan [document INV1], including in relation to the capacity of schools, healthcare and wastewater treatment?

Q5.58 Can the site be developed using land for residential development which has the lowest risk of flooding from any source (including surface water) and in a way which would not increase flood risk elsewhere?

Q5.59 Would the proposed allocation result in the loss of best and most versatile agricultural land (Grade 3a)? If so, has plan-making been consistent with national policy at paragraph 174 of the NPPF?

Q5.60 Would the 'key considerations' for Site GA4 in Policy SP7 be effective in integrating the proposed development into its edge of village setting and protecting existing features of biodiversity value and securing overall biodiversity net gain?

Q5.61 Is the indicative capacity of the site at 259 dwellings justified? Can the site deliver a suitable mix of housing types, including 30% affordable housing?

Q5.62 Is the forecast trajectory of how and when this site could deliver, reasonable and justified?

Issue 6: Land at Whitburn Lodge & Land to North of Shearwater, Whitburn – Policy SP7, Sites GA5 & GA6

Q5.63 Is the Green Belt Study evidence in relation to Parcel WH1 and its assessment findings in Chapter 5 and Appendix B relating to Sites GA5 and GA6 and harm to Green Belt justified and consistent with national policy? Has the approach to Sites GA5 and GA6 avoided areas of higher Green Belt harm from being developed?

Q5.64 Does Policy SP7 and the key considerations for Sites GA5 and GA6 reflect the Green Belt Study assessment on any site specific mitigation measures or compensatory improvements set out at Appendix C of the Study?

Q5.65 Can Site GA6 be developed for housing in accordance with the Habitats Regulations and a conclusion of no adverse impact on the qualifying features of the Durham Coast SAC and Northumbrian Coast SPA/Ramsar? Is it justified and legally compliant with the Regulations to require at least one season's additional non-breeding monitoring data for wading birds for fields within 750 metres of the site? What is this part of the policy seeking to achieve and would it be justified and effective?

Q5.66 Are the sites well-related to services and facilities in Whitburn and in a location well served by public transport?

Q5.67 Are the sites, and in particular Site GA6, compatible with wildlife corridors and the Green & Blue Infrastructure corridor⁶ in this part of Whitburn as well as the need to secure minimum levels of biodiversity net gain? Would it be necessary to modify the Plan, either the site boundary or the key considerations for Site GA6, in relation to the wildlife corridor network?

Q5.68 Are there any heritage implications for Site GA5? Would the loss of the Whitburn Lodge building be acceptable in heritage terms?

Q5.69 Given the existing Whitburn Neighbourhood Plan (WNP) and Whitburn Village Design Guidelines (WVDG), is the Plan positively prepared, justified and consistent with national policy in proposing to allocate Sites GA5 and GA6? Would it be effective that a key consideration for these sites in Policy SP7 is to “have regard to WNP and WVDG”?

⁶ As identified in the 2023 Green & Blue Infrastructure Strategy [Document NAT1]

Issue 7: Wardley Colliery - Policy SP14

Q5.70 Is the Green Belt Study evidence in relation to Parcel FO1 and its assessment findings in Chapter 5 and Appendix B relating to the site allocated in Policy SP14 and the degree of harm to Green Belt purposes justified and consistent with national policy? Has the approach to the Wardley Colliery site in Policy SP14 avoided areas of higher Green Belt harm from being developed?

Q5.71 Does Policy SP14 reflect the Green Belt Study assessment on any site specific mitigation measures or compensatory improvements set at Appendix C of the Study?

Q5.72 Does the evidence in the 2023 Employment Land Review [Document EMP1] and the 2024 Employment Land Technical Paper [Document EMP2 – particularly Section 11] demonstrate that the Wardley Colliery site would be necessary and suitable in contributing to meet employment land needs in South Tyneside over the plan period to 2040?

Q5.73 Would it be necessary for soundness and compatible with the Green Belt and ecology evidence to enlarge the extent of the proposed allocation at Wardley Colliery to ensure greater flexibility in meeting employment needs and to enable a more comprehensive development at this location?

Q5.74 Have the potential impacts of the proposed allocation on traffic and transport infrastructure been identified, assessed and taken into account at a level which is proportionate to plan-making? Given the proximity of the site to Gateshead's administrative area, is there agreement on likely impacts arising from this employment site (in combination with other proposals in the Plan) on the wider highway network, including junctions at Whitemare Pool and within Gateshead?

Q5.75 Are the proposed modifications at Section 4.2 of the Statement of Common Ground with National Highways [document SUB5g] necessary for soundness?

Q5.76 Is the site/location accessible by means of active travel and public transport? Is there a reasonable prospect of the Metro being extended⁷ in this area within the plan period?

⁷ The representations from Nexus refer to a potential new Metro station at Follingsby Park.

Q5.77 The wider Wardley Colliery site contains areas of ecological value. Is the Plan effective and consistent with national policy in seeking to minimise impacts on biodiversity and allocating land with the least environmental value?

Q5.78 Is Policy SP14 effective in seeking any required ecological mitigation within the Wardley Colliery Local Wildlife Site?

End of Stage 1 Matters, Issues and Questions

Matter 6 Allocations proposed for residential, mixed use and employment within the Main Urban Area (South Shields, Jarrow, and Hebburn)

This will form part of the Stage 2 hearings. Questions for Stage 2 to be published in due course.

Matter 7 Securing sustainable residential development and delivering a sufficient supply of homes.

This will form part of the Stage 2 hearings. Questions for Stage 2 to be published in due course.

Matter 8 Policies for Economic Development and Town Centres

This will form part of the Stage 2 hearings. Questions for Stage 2 to be published in due course.

Matter 9 Policies for Climate Change, health and design

This will form part of the Stage 2 hearings. Questions for Stage 2 to be published in due course.

Matter 10 Policies for the Natural Environment

This will form part of the Stage 2 hearings. Questions for Stage 2 to be published in due course.

Matter 11 Policies for the Historic Environment

This will form part of the Stage 2 hearings. Questions for Stage 2 to be published in due course.

Matter 12 Policies for Community Facilities and Open Spaces

This will form part of the Stage 2 hearings. Questions for Stage 2 to be published in due course.

Matter 13 Minerals and Waste

This will form part of the Stage 2 hearings. Questions for Stage 2 to be published in due course.

Matter 14 Securing sustainable and viable growth including coordinated infrastructure provision

This will form part of the Stage 2 hearings. Questions for Stage 2 to be published in due course.

Ends.